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BEFORE THE ARIZONA CORPORATION COMMISSION

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Arizona Corporation Commission

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**IN THE MATTER OF QWEST
CORPORATION'S COMPLIANCE WITH
§271 OF THE TELECOMMUNICATIONS
ACT OF 1996**

DOCKET NO. T-00000A-97-0238

**QWEST'S REPORT FOR THE
SECOND QUARTER 2011 ON
RESOLD LINE SPLITTING AND EEL
SPLITTING PURSUANT TO
COMMISSION ORDER AND NOTICE
OF INDEFINITE SUSPENSION OF
REPORTING**

In the Arizona Corporation Commission's ("Commission") NID and Line Splitting Decision, the Commission ordered Qwest to revise SGAT §9.24.1.1 to include a provision that "Qwest shall report the level of region-wide demand by state for resold line splitting and EEL line splitting on a quarterly basis to the Commission staff and interested CLECs." See Decision No. 64880, page 6, 29. In compliance with this Order, Qwest included the SGAT language in its May 31, 2002 SGAT filing. Qwest now files a report for the Second Quarter of 2011.

Through the Second Quarter of 2011, Qwest had zero resold line splitting arrangements in the Qwest 14-state region. Through the Second Quarter of 2011, Qwest does not have any installations or requests to install EEL splitting anywhere in its 14-state region.

1 On September 30, 2002, Qwest filed its first quarterly report on resold line splitting and EEL line
2 splitting. During the eight and one-half years since that first report was filed, Qwest has filed 34
3 subsequent quarterly reports which have all reflected that no orders have been received for either
4 product in any Qwest state. Further, no CLEC has come forward to dispute Qwest's 35 previous
5 filings reporting that there have not been any requests for these services. The intended purpose
6 of the report was to provide Staff and CLECs with information "so that interested parties can
7 make an independent determination of when demand justifies the making these products standard
8 offerings." Since no provider has demonstrated a need for these services at any time during the
9 past 8 years, Qwest believes that it is doubtful that demand will ever develop.
10

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12 At this time Qwest believes that an indefinite suspension of this reporting requirement is
13 warranted. The report serves no useful purpose as long as there is no demand for resold line
14 splitting or EEL line splitting. Given the amount of time that has passed since the Commission
15 issued its order on resold line splitting and EEL line splitting, as well as the relatively matured
16 state of competition in Arizona, Qwest questions whether the report would provide any useful
17 purpose even if demand were to develop for these products at some future point in time.
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19 However, Qwest will continue to monitor these services in the future and in the unlikely event
20 that it receives orders for either service, it will resume reporting at that point in time. We believe
21 that this approach will help avoid the wasteful use of resources for all parties, including Qwest,
22 the Commission, and CLECs, but will still comply with the stated intent of the Commission's
23 decision.
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RESPECTFULLY SUBMITTED this 29th day of July, 2011.

QWEST CORPORATION

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