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BEFORE THE ARIZONA CORPORATION COMMISSION

AZ CORP COM
DOCKET CONTROL

2015 JUN 24 PM 4:13

SUSAN BITTER SMITH
Chairman

BOB STUMP
Commissioner

BOB BURNS
Commissioner

DOUG LITTLE
Commissioner

TOM FORESE
Commissioner

Arizona Corporation Commission

DOCKET CONTROL

JUN 24 2015

DOCKET CONTROL

RAM

IN THE MATTER OF THE APPLICATION OF
DIECA COMMUNICATIONS DBA COVAD
COMMUNICATIONS COMPANY,
ESCHELON TELECOM OF ARIZONA, INC.,
MCLEODUSA TELECOMMUNICATIONS
SERVICES, INC., MOUNTAIN
TELECOMMUNICATIONS, INC., XO
COMMUNICATIONS SERVICES, INC. AND
QWEST CORPORATION REQUEST FOR
COMMISSION PROCESS TO ADDRESS KEY
UNE ISSUES ARISING FROM TRIENNIAL
REVIEW REMAND ORDER, INCLUDING
APPROVAL OF QWEST WIRE CENTER
LISTS

DOCKET NOS. T-03632A-06-0091
T-03406A-06-0091
T-03267A-06-0091
T-03432A-06-0091
T-04302A-06-0091
T-01051B-06-0091

QWEST CORPORATION dba
CENTURYLINK QC APPLICATION
FOR APPROVAL OF 2015
ADDITIONS TO NON-IMPAIRED
WIRE CENTER LIST

Qwest Corporation dba CenturyLink QC ("CenturyLink") hereby requests that the Arizona Corporation Commission ("Commission") approve CenturyLink's 2015 additions to its non-impaired wire center list in accordance with the FCC's *Triennial Review Remand Order* ("TRRO").¹

INTRODUCTION

This application to approve additions to CenturyLink's list of non-impaired wire centers is simply one more of a series of filings made to designate certain of CenturyLink's Arizona wire centers as "non-

¹ Order on Remand, *In the Matter of Review of Unbundled Access to Network Elements, Review of Section 251 Unbundling Obligations of Incumbent Local Exchange Carriers*, CC Docket No. 01-338, WC Docket No. 04-313 (FCC rel. February 4, 2005) (hereafter "*Triennial Review Remand Order*" or "*TRRO*").

1 impaired” for purposes of Section 252 of the Telecom Act, under the FCC’s *TRRO* ruling in 2005. The
2 Commission has approved all of CenturyLink’s previous applications.

3 CenturyLink is an incumbent local exchange carrier (“ILEC”). The *TRRO* provided an important
4 standard that all state jurisdictions must follow with regard to ILECs’ duty under Section 251(c)(3) to make
5 unbundled network elements (“UNEs” or “network elements”) available to requesting carriers.

6 Section 251(d)(2)(B) provides that in determining which network elements must be made available under
7 Section 251(c)(3), the FCC shall consider whether the failure to provide access to such network element
8 would “impair” the ability of the telecommunications carrier seeking access to provide the services it seeks
9 to offer. Among other things, the *TRRO* set the standards by which high-capacity dedicated transport and
10 loops must be offered as UNEs. Under the *TRRO*, high-capacity dedicated transport will not be required to
11 be offered as UNEs if the connecting wire centers meet certain threshold criteria. Those criteria involve the
12 number of ILEC business lines and fiber-based collocators in those connected wire centers. The *TRRO*
13 adopts different business line and collocator thresholds for DS1, DS3, and dark fiber transport. Similarly,
14 high-capacity loops will not be required to be offered as UNEs if the number of ILEC business lines and
15 fiber-based collocators reach certain identified levels. The *TRRO* adopts different business line and
16 collocator thresholds for DS1 and DS3 loops, and eliminates unbundling requirements for dark fiber loops
17 entirely.²

18 A wire center is the location of the ILEC local switching facility containing one or more central
19 offices, and defines the area in which all customers serviced by a given wire center are located. When wire
20 centers are designated as unimpaired for certain services, Competitive Local Exchange Carriers (“CLECs”)
21 are no longer able to access those services at Total Element Long Run Incremental Cost (“*TELRIC*”) rates,

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23
24
25 ² For a Commission recap of the *TRRO* standards, see Decision No. 70747, ¶ 10.

1 and CLECs must transition to facilities of their own, to alternative services from another provider, or from
2 the ILEC at non-UNE rates.³

3 The data for determining whether wire centers meet the non-impaired standard are collected every
4 year, and under the process that has been established, CenturyLink may only declare and seek approval of
5 additions to the list of non-impaired wire centers based on the business line count prior to June 1st of any
6 given year. Requests based on the number of fiber collocators may be made at any time. The Commission
7 has approved the process which CenturyLink follows, by specific order (the “*TRRO* Wire Center Settlement
8 Order”), based on a settlement agreement (“Settlement Agreement”) with a coalition of CLECs (“Joint
9 CLECs”) who were parties in this standing docket.⁴

10 Requests for approval of additions to the non-impaired wire center list, and the process for such
11 requests, are familiar to the Commission. This is the seventh time since the FCC adopted the *TRRO* that
12 conditions have been met for adding wire centers to the list in Arizona. The Commission has approved all
13 of the previous requests for additions.⁵ In the previous orders, the Commission ordered that procedures
14 established therein shall apply to subsequent requests for additions to the non-impaired wire center list.
15 This Application is made in conformance with those procedures.

16 **REQUEST FOR 2015 ADDITIONS TO NON-IMPAIRED WIRE CENTER LIST**

17 By this filing, CenturyLink is seeking to add to the list of “Tier 1” wire centers, which are wire
18 centers with 4 or more fiber based collocators or at least 38,000 or more business lines. Under the *TRRO*,
19 there is no impairment for DS1 transport on routes connecting wire centers where both wire centers are
20

21 ³ Description by the Commission, Decision No. 70747, ¶ 11.

22 ⁴ The basic process for Qwest to seek approval of additions to the non-impaired wire center list
23 was determined by the Commission in Docket Nos. T-03632A-06-0091, T-03406A-06-0091, T-03267A-
24 06-0091, T-03432A-06-0091, T-04302A-06-0091, T-01051B-06-0091 (collectively, the “*TRRO* Wire
Center Dockets”) on May 16, 2008, Decision No. 70355 (“*TRRO* Settlement Order.”) The basis for the
process was a joint settlement agreement (“Settlement Agreement”) between and among Qwest and a
coalition of joint CLECs, whose names are listed in the caption of this proceeding.

25 ⁵ Decision Nos. 70355, 70747, 72178, 74245, and 74748.

1 designated as "Tier 1." With this application, CenturyLink designates the wire center shown below as Tier

2 1. This wire center is currently designated as Tier 2.

STATE	WIRE CENTER	CLLI	TIER	NON-IMPAIRMENT FOR
AZ	Phoenix Cactus	PHNXAZCA	Tier 1	DS1, DS3 Transport & DF

3
4
5
6 This request for the Commission to declare this wire center as a Tier 1 wire center is based solely on
7 the number of fiber-based collocations. Under the Settlement Agreement with the Joint CLECs, such a
8 request may be made to the Commission at any time.

9 **NOTICE ABOUT THIS APPLICATION TO POTENTIALLY AFFECTED CARRIERS**

10 In Decision No. 72178, the Commission ordered changes to the process for notifying CLECs about
11 subsequent applications to add wire centers to the Non-Impaired Wire Centers List. CenturyLink has
12 followed those provisions. Pursuant to Decision No. 72178, CenturyLink and Staff have worked together
13 to develop a mailing list of affected Arizona carriers, as well as the form of notice to be sent. The form of
14 notice ("Notice"), approved by the Staff, is provided as Attachment A to the Certificate of Mailing, which is
15 marked as Exhibit A. The list of potentially affected carriers in Arizona, including but not limited to the
16 Joint CLECs named in the caption of the proceeding, ("Notice List"), has been approved by the Staff, and is
17 provided as Attachment B to Exhibit A. Consistent with the Settlement Agreement, CenturyLink must send
18 the Notice to potentially affected carriers via its email notification channels, at least 5 business days prior to
19 the filing of the Application. CenturyLink sent the Notice on June 17, 2015. Certification of that mailing is
20 attached, marked as Exhibit A.

21 **REGARDING INFORMATION IN SUPPORT OF CENTURYLINK'S APPLICATION,**
22 **SUBJECT TO STANDING PROTECTIVE ORDER**

23 CenturyLink has based its new non-impairment determination upon information that is required to
24 be examined by the Arizona Commission, given the parameters of the *TRRO* and the Settlement Agreement
25 with Joint CLECs. The data involves, in part, certain highly-confidential CLEC-specific wire center data

1 for fiber-based collocators in specific wire centers. Non-confidential (redacted) versions of the supporting
2 data are submitted with this Application. Attached and marked as Exhibit B, is the non-confidential
3 affidavit and associated attachments of Renee Albersheim. Ms. Albersheim's affidavit describes and
4 presents evidence in support of the inventory of fiber-based collocators in CenturyLink wire centers used to
5 ascertain the appropriate Tier designation and subsequent non-impairment designation.

6 Confidential versions of the affidavit and attachments will be made available to the Commission
7 Staff and those wireline CLECs in Arizona that have executed the Protective Order that is attached as
8 Exhibit C.

9 In the previous phase of these dockets, CenturyLink, the Joint CLECs and the Commission Staff
10 agreed to utilize this form of Protective Order, in order to protect the information from unauthorized use or
11 disclosure, and to provide the process for handling such information in connection with these dockets. With
12 respect to that agreed-upon form of order, the Commission found: "Its terms are reasonable, and will be
13 adopted to apply to the 2007 and 2008 Additions Applications as well as any future proceedings, until
14 further order of the Commission."⁶

15 CenturyLink will make the confidential version of the data supporting its list of additional non-
16 impaired wire centers available to CLECs who sign and file acknowledgements of the Protective Order in
17 the docket. By the terms of the Settlement Agreement approved by the Commission, CLECs that have
18 signed the protective order are not required to re-sign it for each new CenturyLink request. However,
19 CenturyLink suggests that each CLEC relying on an earlier signature inform CenturyLink that it is doing
20 so, and confirm that the personnel and addresses have not changed.

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25 ⁶ Docket No. T-03632A-06-0091, et al., Procedural Order, August 25, 2008, Page 4, lines 12-14.

1 **CENTURYLINK'S PROPOSED ADDITION TO THE NON-IMPAIRED WIRE CENTER LIST**
2 **MEET THE CRITERIA OF THE TRRO, THE SETTLEMENT AGREEMENT, AND DECISIONS**
3 **OF THE COMMISSION, AND THUS CENTURYLINK'S APPLICATION SHOULD BE**
4 **APPROVED**

5 CenturyLink states that it makes this Application in conformity with the provisions of the *TRRO*,
6 the Settlement Agreement, and Decision Nos. 70355, 70747, 72178, 74245, and 74748. Specifically, and
7 without limitation, CenturyLink may request addition of non-impaired wire centers at any time based solely
8 on the number of fiber-based collocators. This Application is based solely on the number of fiber-based
9 collocators, and not based upon line counts.

10 CenturyLink has used the methodology set forth in Section VI of the Settlement Agreement and has
11 used the most recent data available at the time it submits this proposed designation for Commission review.
12 CenturyLink's supporting data relating to fiber-based collocators meets all of the requirements of the
13 Settlement Agreement, Section VI. E. 1. a through f.

14 **PERIOD FOR OBJECTION AND PROCESS, AFTER NOTICE**

15 Under Decision No. 70355, if objections are not filed by Staff, affected carriers or intervenors, or
16 substantive issues are not raised, the Staff may prepare an Order for the Commission's consideration, or
17 forward the matter to the hearing Division for the preparation of an Order, upon Staff's Report and
18 recommendations. This is entirely consistent with the Settlement Agreement, which contemplates that
19 CLECs shall have thirty (30) days from the filing date of the petition⁷ to object to the wire center
20 designations, and that in the absence of objections, the filing should be approved.

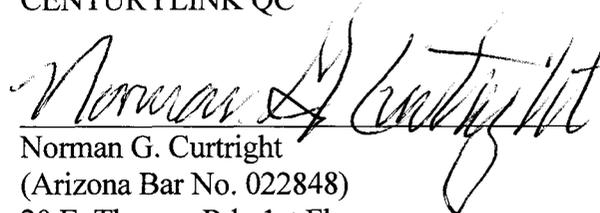
21 **CONCLUSION**

22 Accordingly, for the reasons set forth above, CenturyLink requests the Commission approve the
23 2015 additions to the non-impaired wire center list.

24
25 ⁷ See Decision No. 70355, Exhibit A, Page 11, Section F.1.

1 RESPECTFULLY SUBMITTED this 24th, day of June, 2015.

2 QWEST CORPORATION D/B/A
3 CENTURYLINK QC

4 

5 Norman G. Curtright
6 (Arizona Bar No. 022848)
7 20 E. Thomas Rd., 1st Floor
8 Phoenix, Arizona 85012
9 Tel: (602) 630-2187
10 Fax: (303) 383-8484
11 Email: norm.curtright@centurylink.com

9 ORIGINAL and 13 copies hand-delivered
10 for filing this 24th, day of June, 2015, to:

11 Docket Control
12 ARIZONA CORPORATION COMMISSION
13 1200 West Washington Street
14 Phoenix, AZ 85007

13 COPY of the foregoing hand delivered
14 this 24th, day of June, 2015, to:

15 Jane Rodda
16 Administrative Law Judge
17 Arizona Corporation Commission
18 1200 West Washington Street
19 Phoenix, AZ 95012

Maureen A. Scott, Esq.
Legal Division
ARIZONA CORPORATION COMMISSION
1200 W. Washington Street
Phoenix, AZ 85007

18 Steve Olea, Director
19 Utilities Division
20 Arizona Corporation Commission
21 1200 West Washington Street
22 Phoenix, AZ 85007

21 COPY of the foregoing mailed
22 this 24th, day of June, 2015, to

23 360networks (USA) Inc.
24 Attn: Michel Singer Nelson
25 Associate General Counsel
867 Coal Creek Circle, Suite 160
Louisville, CO 80027

AT&T Communications of the
Mountain States Inc.
Attn: Cindy Hardy
One AT&T Way, Rm 2B115E
Bedminster, NJ 07921

1 Cox Arizona Telcom, L.L.C.
Attn: Mark Dinunzio
2 1500 W Deer Valley Rd.
Phoenix AZ 85027
3

Kim Isaacs
Director Carrier Relations
Integra Telecom
160 Golden Hills Drive
Golden Valley, MN 55416

4 McLeodUSA Telecommunications Services,
Attn: Stephanie D. Marsh
5 4001 Rodney Parham Road
Little Rock, AR 72212
6

Katherine Mudge
Director, Regulatory Affairs & Litigation
MegaPath Corporation
1835-B Kramer LN, Ste. 100
Austin, TX 78758

7 Mike Hazel
Mountain Telecommunications
8 1430 West Broadway, Suite 206
Tempe, AZ 85282
9

MCImetro Access Transmission
Services, LLC
201 Spear St, 9th Flr
San Francisco, CA 94105

10 Orbitcom, Inc.
1701 N. Louise Ave.
Sioux Falls, SD 57107
11

Michael W. Patten
Roshka DeWulf & Patten, PLC
One Arizona Center
400 East Van Buren Street, Suite 800
Phoenix, AZ 85004

12 Ms. Rochelle Jones
13 Senior Vice President, Regulatory
tw telecom of Arizona 11c
14 10475 Park Meadows Dr.
Littleton, CO 80124
15

WilTel Communications, LLC
712 N. Main St.
Coudersport, PA 16915

16 Rex Knowles
Regulatory Contact
XO Communications Services
17 111 East Broadway, Suite 1000
Salt Lake City, UT 84111
18

Zayo Group, LLC
Attn: Tin Gentry
400 Centennial Parkway
Louisville, CO 80027

19
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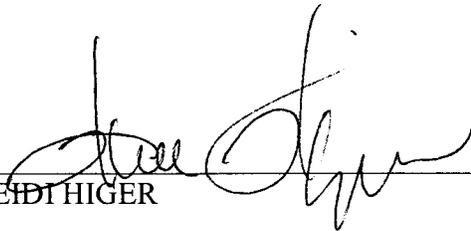
9-44
45-44

A copy of said carrier notice is provided as Attachment A.

A list a carriers to whom the notice and was sent is provided as Attachment B.

Further this affiant sayeth not.

DATE: June 17, 2015

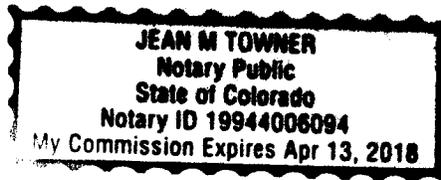

HEIDI HIGER

SUBSCRIBED AND SWORN to before me the 17th day of June, 2015.


NOTARY PUBLIC

My Commission Expires:

4-13-2018



ATTACHMENT A
2015 CARRIER NOTICE

June 17, 2015

Carrier Name and Address

TO: Carrier Contact
RE: Carrier Name

Announcement Date: June 17, 2015
Filing Date: June 24, 2015
Document Number: NETW.ANNC.06.10.15.F.13615.AS_TRRO_2015
Notification Category: Contract/Network Notice
Target Audience: CLECs operating in the state of AZ
Subject: Additions to Non-Impaired Wire Center Lists

On June 24, 2015 CenturyLink will file with the Arizona Corporation Commission for approval of additions to CenturyLink's Non-Impaired Wire Center List.

CenturyLink's Petition will be filed in standing Arizona Corporation Commission Docket Number T-03632A-06-0091. Affected carriers may obtain further information regarding the proposed non-impaired wire center designations by contacting their Service Manager. Confidential Information supporting the Arizona designations is available under an existing protective order issued in Decision No. 70355. Affected carriers must review the information and file any objections to the proposed designations on or before July 24, 2015 in Docket Number T-03632A-06-0091.

CenturyLink offers this Notice pursuant to the terms and conditions of the Multi-State Settlement Agreement Regarding Wire Center Designations and Related Issues entered into by CenturyLink Corporation and Covad Communications Company and DIECA Communications, Inc. (collectively "Covad"), Eschelon Telecom, Inc. ("Eschelon"), Integra Telecom Holdings, Inc. ("Integra"), McLeodUSA Telecommunications Services, Inc. ("McLeodUSA"), Onvoy, POPP.Com ("POPP"), US Link, Inc. d/b/a TDS Metrocom, Inc. ("TDSM"), and XO Communications Services, Inc. ("XO") on June 20, 2007.

At this time, CenturyLink anticipates requesting the addition of the following Wire Centers to its Non-Impaired Wire Center Lists as having met the Tier 1 or Tier 2 Wire Center designations as defined in §51.319(e)(3):

STATE	WIRE CENTER	CLLI8	TIER	NO IMPAIRMENT FOR
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ATTACHMENT A
2015 CARRIER NOTICE

AZ	Phoenix Cactus	PHNXAZCA	Tier 1	DS1, DS3 Transport & DF
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If you have any questions or concerns regarding this notice please contact your CenturyLink Service Manager, Dallas James on (260) 724-1678 or at Dallas.T.James@centurylink.com; Dave Allen on (719) 636-4521 or at David.Allen2@CenturyLink.com; David Russom on (512) 363-5195 or at Dave.Russom@centurylink.com; Doug Poyser on (913) 353-7390 or at Doug.Poyser@centurylink.com; Mike Backstrom on (612) 359-5104 or at Mike.Backstrom@CenturyLink.com; Sandra Norman on (770) 777-5681 or at Sandra.Norman@CenturyLink.com OR Valerie Estorga on (623) 939-1065 or at Valerie.Estorga@CenturyLink.com. CenturyLink appreciates your business and we look forward to our continued relationship.

Sincerely,

Qwest Corporation dba CenturyLink QC

In cases of conflict between the changes implemented through this CMP and any CLEC interconnection agreement (whether based on the CenturyLink SGAT or not), the rates, terms and conditions of such interconnection agreement shall prevail as between CenturyLink and the CLEC party to such interconnection agreement. In addition, if changes implemented through this CMP do not necessarily present a direct conflict with a CLEC interconnection agreement, but would abridge or expand the rights of a party to such agreement, the rates, terms and conditions of such interconnection agreement shall prevail as between CenturyLink and the CLEC party to such agreement.

Note: To view your CenturyLink Wholesale notifications online, please log into our ANR (Accessible Notices Repository) at : <http://notices.centurylinkapps.com>.

If you would like to subscribe, unsubscribe or change your current profile to CenturyLink Wholesale mailouts please go to the 'Subscribe/Unsubscribe' web site and follow the subscription instructions. The site is located at:
<http://www.centurylink.com/wholesale/notices/cnla/maillist.html>

CenturyLink Inc. – 930 15th Street 7th Floor, Denver CO 80202

ATTACHMENT B
2015 TRRO CARRIER NOTICE LIST

Carrier

1 -800-Reconex, Inc.
1-800 Collect
365 Wireless, LLC
AboveNet Communications, Inc.
Access Point, Inc.
ACN Communication Services, Inc.
Airespring, Inc.
Airus, Inc. fka IntelPeer, Incl
Andiamo Telecom, LLC
ANPI Business, LLC
AT&T Communications of the Mountain States Inc.
AZX Connect, LLC
Baldwin County Internet/DSSI Services, LLC
Bandwidth.com CLEC, LLC
BCN Telecom, Inc.
BLC Management, LLC
BridgeBand Communications, Inc.
Broadband Dynamics, LLC
Broadview Networks, Inc.
Broadvox-CLEC LLC
BT Communications Sales, LLC
Budget PrePay, Inc.
BullsEye Telecom, Inc.
Buy-Tel Communications Inc.
Cbeyond Communications, LLC
CCG Communications, LLC
CI2, Inc.
Cincinnati Bell Any Distance, Inc.
CityNet Arizona, LLC
Clertech.com, Incorporated
CloseCall America, Inc.
CM Tel (USA) LLC
Comcast Phone of Arizona, LLC
Comnet (USA) LLC
Conterraa Ultra Broadband
Cox Arizona Telcom, L.L.C.
Crown Castle NG West Inc.
Crown Castle Solutions
Curatel, LLC
CVC CLEC, LLC
Cypress Communications
dishNet Wireline, LLC
dPI Teleconnect, LLC
DSLnet Communications, LLC
Earthlink

ATTACHMENT B
2015 TRRO CARRIER NOTICE LIST

Carrier

Easton Telecom Services, LLC
Electric Lightwave, LLC
EMC Telecom Corporation
EnTelegent Solutions, Inc.
Eschelon Telecom of Arizona
ExteNet Systems, Inc.
First Communications, LLC
Frontier Communications of America, Inc.
Frontier Communications of the White Mountains, Inc.
Gazelle Link, LLC
GC Pivotal d/b/a Global Capacity
Gila Local Exchange Carrier
Global Connection Inc. of America
Global Crossing Local Services, Inc.
Globcom, Inc.
Globetel, Inc.
Granite Telecommunications, LLC
Greenfly Networks, Inc.
Group Six Communications, LLC
HJN Telecom, Inc.
IDT America, Corp.
inContact, Inc.
iNetworks Group, Inc.
Integra Telecom, Inc
Inteliquent
Inteltrace, Inc.
Intellicall Operator Services, Inc.
Intrado Communications, Inc.
Ionex
KMC Data, LLC
Leap Frog Telecom, LLC
Level 3 Communications, LLC
Looking Glass Networks
Matrix Telecom, Inc.
MCC Telephony of the West, LLC
McGraw Communications, Inc.
MCImetro Access Transmission Services, LLC
McLeodUSA Telecommunications Services, Inc.
Megapath Corporation
MERCURY VOICE & DATA COMPANY
Metropolitan Telecommunications of Arizona, Inc.
Midwestern Telecommunications, Inc.
Mitel Netsolutions, Inc.
Montana Opticom, LLC
Mountain Telecommunications of Arizona, Inc.

ATTACHMENT B
2015 TRRO CARRIER NOTICE LIST

Carrier

Navigator Telecommunications, LLC.
New Access Communications, LLC
NextGen Communications, Inc.
North County Communications Corporation of Arizona
NOS Communications, Inc
NSW Telecom, Inc.
Onvoy, Inc
Orbitcom, Inc.
Pacific Centrex Services, Inc.
Pacific Telecom Communications Group, Inc.
Pac-West Telecomm, Inc.
PARCOM Communications Inc.
Peerless Network of Arizona, LLC
PiperTel
PNG Telecommunications
POPP Communications, Inc.
Preferred Long Distance, Inc.
Prime Time Ventures, LLC
QuantumShift Communications, Inc.
Qwest Communications Corporation
Red Rock Telecommunications, LLC
Re-Invent Telecom, LLC
Rural Network Services, Inc.
SBC Long Distance, LLC
Spectrotel, Inc.
Sprint Communications Company L.P.
Talk America Inc.
TCG Phoenix
TCO Network, Inc.
TDS Long Distance Corporation
Telco Experts, LLC
Telephone Restoration Network dba Telnet
Telequality Communications, Inc.
Telesphere Access, LLC
TelLogic
Telrite Corporation
Telscape Communications, Inc.
Threshold Communications
Time Warner Cable Information
TNCI
TRANSTELCO, INC
TransWorld Network, Corp
Triarch Marketing Inc.
tw telecom of Arizona llc
Unite Private Networks, LLC

ATTACHMENT B
2015 TRRO CARRIER NOTICE LIST

Carrier

Valley Connections, LLC
ValuTel Communications, Inc.
Velocity The Greatest Phone Company Ever, Inc.
Verizon Select Services, Inc.
Vilaire Communications Inc.
Virtual Network Solutions, Inc.
Wholesale Carrier Service, Inc.
Wide Voice, LLC
WilTel Communications, LLC
Wiltel Local Network, LLC
XO Communications Services, Inc.
Xspedius Management Co. Switched Services, LLC
Ygnition Networks, Inc.
Ymax Communications Corp.
ZAYO BANDWIDTH, LLC

BEFORE THE ARIZONA CORPORATION COMMISSION

IN THE MATTER OF THE
APPLICATION OF DIECA
COMMUNICATIONS DBA COVAD
COMMUNICATIONS COMPANY, ET
AL

DOCKET NO. T-03632A-06-0091
T-03406A-06-0091
T-03267A-06-0091
T-03432A-06-0091
T-04302A-06-0091
T-01051B-06-0091

AFFIDAVIT OF RENÉE ALBERSHEIM

STATE OF COLORADO)
) ss.
COUNTY OF DENVER)

I, RENÉE ALBERSHEIM, being first duly sworn, depose and state that:

1. My name is Renée Albersheim. I am employed by CenturyLink as a Lead Witnessing Representative for the Wholesale Organization. My business address is 930 15th Street, 6th Floor, Denver Colorado, 80202.
2. Subsequent to and in adherence to terms of the "Multi-State Settlement Agreement Regarding Wire Center Designations and Related Issues" which was filed with this Commission on Friday, June 22, 2007 (here after referred to as "Settlement Agreement"), CenturyLink filed a list of additional Non-Impaired Wire Centers on June 24th, 2015 with the Arizona Corporation Commission. The Settlement Agreement was adopted by the Arizona Commission in Docket Nos. T-03632A-06-0091, T-3406A-06-0091, T-035627A-06-00091, T-03432A-06-0091, T-04302A-06-0091, T-0151B-06-0091 (collectively the "TRRO Wirecenter Dockets") on May 16, 2008, Decision No. 70355 ("TRRO Settlement Order").

3. In support of the filing, I supervised an inventory of Fiber-Based Collocators in CenturyLink Wire Centers to ascertain the number of fiber-based collocators in each wire center and the appropriate "Tier" designation. The Tier was subsequently used to establish Non-Impairment. Highly-Confidential Attachment A to this affidavit, "Collocations by Wire Center", details the Tier designation by wire center and details the number and identity of the fiber-based collocators in each wire center.
4. As part of that inventory, and as required under the terms of the Settlement Agreement, I oversaw a physical field verification of the inventoried fiber-based collocators, and cross-referenced the physical inventory data with the corresponding order and construction records and billing data. The results of that physical field verification (The Collocation Verification Worksheets) are contained in Highly Confidential Attachment B to this affidavit.
5. Additionally, I supervised research of the billing records for the collocation space and the active power supply to each collocation to ensure that each collocation was indeed an active fiber-based collocation and that the operators of these fiber-based collocations met the FCC's definition of a Fiber-Based Collocator.
6. CenturyLink sent each of the identified Fiber-Based Collocators a letter requesting further validation of their status as a Fiber-Based Collocator. Based on their responses, and if necessary, I oversaw the reconciliation of any discrepancies as to the physical aspects of the collocation (as noted on the physical verification worksheets) or in information with respect to changes in ownership, mergers and/or acquisitions (See Highly-Confidential Attachment C for a copy of the letters, and Highly Confidential Attachment D the responses received from responding CLECs)
7. CenturyLink undertook a thorough analysis to ensure that the number of Fiber-Based Collocators in CenturyLink Wire Centers was accurately counted. Its process for identifying fiber-based collocators meeting the FCC's definition

produced an accurate and verified count. The resulting determination of a change in the non-impairment status of Arizona Wire Centers, having relied on this accurate and verified data, is by extension just as accurate and should be validated by this Commission.

8. This accurate and verified data on the number of Fiber-Based Collocators was the sole determining factor in establishing which additional Arizona wire centers were Non-Impaired. The numbers of Business Lines in each Wire Center based on the most recently filed ARMIS 43-08 data, and having no impact on the non-impairment status of any Arizona wire centers at this time, were not considered for this filing.

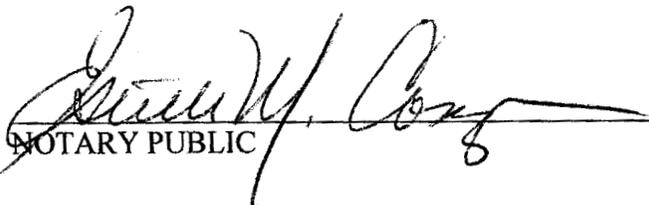
Further this affiant sayeth not.

DATE: June 22nd, 2015



RENÉE ALBERSHEIM

SUBSCRIBED AND SWORN to before me the 22nd day of June, 2015.


NOTARY PUBLIC

ESTELLE COSENZA
Notary Public
State of Colorado
Notary ID 20144045017
My Commission Expires Jan 15, 2019

ESTELLE COSENZA
Notary Public
State of Colorado
Notary ID 20144045017
My Commission Expires Jan 15, 2019

Highly Confidential Attachment A

Arizona Collocators by Wire Center

State	WC CLLI	Co Name	CLEC Name	Tier
Arizona	PHNXAZCAHG1	Phoenix Cactus	REDACTED	
Arizona	PHNXAZCAHG7	Phoenix Cactus		
Arizona	PHNXAZCAHG8	Phoenix Cactus		
Arizona	PHNXAZCAHG9	Phoenix Cactus		
		Phoenix Cactus		Tier 1

HIGHLY CONFIDENTIAL ATTACHMENT B
FIELD VERIFICATION

	A CLEC Name	B Cable Type	C State	D WC CLI	E CO Name	F Fiber	G Exp Fiber	H Termination Is Collis?	I Exit/Over Central Office?	J Visual Power?
1	REDACTED									
2										
3										
4										
5										
6										
7	Verified by: Pete Mortensen									
8	Date: 03/20/2015									

930 15th Street, 6th Floor

Denver, CO 80202

Announcement Date: May 08, 2015
Effective Date: NA
Document Number: CLEC_Legal_Ownership
Notification Category: Network Notification
Target Audience: [REDACTED]
Subject: CLEC Legal Ownership Information and Fiber-based Collocation Validation - Action Requested

CenturyLink will be filing with state regulatory commissions requesting that certain wire centers located in those states be deemed non-impaired. This filing is being made because the wire centers meet the threshold criteria for non-impairment outlined in the Federal Communication Commission's ("FCC") Triennial Review Remand Order, FCC-04-290 ("TRRO").

One component of the FCC's non-impairment thresholds is the presence of fiber-based collocators in a wire center. Rule 51.5 of the FCC rules requires that to be deemed a fiber-based collocator; the following criteria must be met:

A fiber-based collocator is defined as any carrier, unaffiliated with the incumbent LEC (CenturyLink), that maintains a collocation arrangement in an incumbent LEC (CenturyLink) Wire Center, with active electrical power supply, and operates a fiber-optic cable or comparable transmission facility that:

- a. terminates at a collocation arrangement within the Wire Center;
- b. leaves the incumbent LEC's (CenturyLink's) Wire Center premises; and
- c. is owned by a party other than the incumbent LEC (CenturyLink) or any affiliate of the incumbent LEC (CenturyLink), except as set forth in this definition. Dark fiber obtained from an incumbent LEC (CenturyLink) on an indefeasible right of use basis shall be treated as non-incumbent LEC (non-CenturyLink) fiber-optic cable. Two or more affiliated fiber-based collocators in a single Wire Center shall collectively be

counted as a single fiber-based collocator. For the purposes of this definition, "affiliate" is defined by 47 U.S.C. §153(1) and any relevant interpretation in that title.

The purpose of this notice is to advise you that CenturyLink is relying on the fiber-based collocation owned and operated by your company in support of its request that certain wire centers be found to be non-impaired and, therefore, relieving CenturyLink of unbundling obligations for certain high capacity UNEs.

Provided below is your carrier-specific fiber-based collocation data on which CenturyLink is relying for its determination of wire center non-impairment. Please review this data and contact CenturyLink by no later than June 15, 2015, if you disagree with the fiber-based collocation designation and you have information to support this position or if there is some inaccuracy in the information CenturyLink has on file identifying legal ownership.

CLEC Name	State	WC CLLI	CO Name	Type of Collocation
REDACTED				

By close of business on June 15, 2015, please send to CenturyLink via certified mail a letter that includes:

- a. A verification of the ownership/relationship information described above, and;

- b. Additional information about other ownership relationships that may have an impact on CenturyLink's fiber collocation customer records for this wire center, if any, and;
- c. A confirmation that these relationships meet the requirements of the FCC's Order and;
- d. A validation of the fiber-based collocation data as described above.
- e. Corrections if any errors are contained in the information provided.

Please address the letter to:

Renee Albersheim

CenturyLink

930 15th Street, 6th Floor

Denver, CO 80202

If you have any questions or would like to discuss this request, please contact Renee Albersheim via email: Renee.Albersheim@centurylink.com

Sincerely,

CenturyLink Corporation

930 15th Street, 6th Floor

Denver, CO 80202

May 08, 2015

Announcement Date:
Effective Date:
Document Number:
Notification Category:
Target Audience:
Subject:

NA
CLEC_Legal_Ownership
Network Notification

REDACTED

CLEC Legal Ownership Information and Fiber-based Collocation Validation - Action Requested

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Denver, CO 80202

Announcement Date: May 08, 2015
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CLEC Name	State	WC CLLI	CO Name	Type of Collocation
REDACTED				

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CenturyLink

930 15th Street, 6th Floor

Denver, CO 80202

If you have any questions or would like to discuss this request, please contact Renee Albersheim via email: Renee.Albersheim@centurylink.com

Sincerely,

CenturyLink Corporation

From: [REDACTED]
Sent: Monday, June 15, 2015 2:37 PM
To: Albersheim, Renee
Subject: Correction & Renton [REDACTED] Information - CLEC Legal Ownership Information and Fiber-based Collocation Validation - Action Requested

Hello Renee –

Below is an corrected table for [REDACTED] response to CenturyLink's request for fiber-based collocation validation. Please let me know if you have any questions. Thanks

CLEC Name	State	WC CLLI	CO Name	Type of Collocation	Meets the definition of Fiber Based Collocator Yes/No
[REDACTED]	UT	AMFKUTMA	American Fork	Caged	Yes
[REDACTED]	WA	RNTNWA01	Renton	Caged (2)	No – Collocation if fed by CenturyLink Unbundled Dark Fiber. [REDACTED] is an [REDACTED] affiliate therefore its Renton collocation is not counted as a separate fiber based collocator
[REDACTED]	WA	RNTNWA01	Renton	Caged	Yes
[REDACTED]	WA	SPKNWAFA	Spokane Fairfax	Cageless	Yes
[REDACTED]	WA	SPKNWAHD	Spokane Hudson	Caged	Yes
[REDACTED]	WA	SPKNWAKY	Spokane Keystone	Caged	Yes
Integra [REDACTED]	WA	SPKNWAWA	Spokane Walnut	Caged	Yes
[REDACTED]	WA	SPKNWAWH	Spokane Whitehall	Cageless	Yes
[REDACTED]	WA	TACMWAFA	Tacoma Fawcett	Caged	No – Collocation if fed by CenturyLink Unbundled Dark Fiber. [REDACTED] is an [REDACTED] affiliate therefore its Yakima Fawcett collocation is not counted as a separate fiber based collocator.
[REDACTED]	WA	TACMWAFA	Tacoma Fawcett	Caged (2)	Yes
[REDACTED]	WA	YAKMWA02	Yakima Chestnut	Cageless	No – [REDACTED] is an [REDACTED] affiliate therefore its Yakima Chestnut collocation is not counted as a separate fiber based collocator.
[REDACTED]	AZ	PHNXAZCA	Phoenix Cactus	Caged	Yes
[REDACTED]	UT	KYVLUTMA	Kaysville	Caged	No – Collocation if fed by CenturyLink Unbundled Dark Fiber. Yes
[REDACTED]	WA	YAKMWA02	Yakima Chestnut	Cageless	Yes

NOTICE - CONFIDENTIAL INFORMATION

The information in this communication may be privileged and strictly confidential. It is intended solely for the use of the individual or entity named above. If the reader of this message is not the intended recipient, or the employee or agent responsible to deliver it to the intended recipient, any dissemination, distribution, copying or other use of the information contained in this communication is strictly prohibited. If you have received this communication in error, please first notify the sender immediately and then delete this communication from all data storage devices and destroy all hard copies.

From: [REDACTED]
Sent: Monday, June 15, 2015 11:49 AM
To: Albersheim, Renee (Renee.Albersheim@CenturyLink.com)
Subject: FW: CLEC Legal Ownership Information and Fiber-based Collocation Validation - Action Requested

[REDACTED] on behalf of itself and its [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] and [REDACTED] affiliates, provides the below response to CenturyLink request for ownership information and fiber-based collocation validation.

CLEC Name	State	WC CLLI	CO Name	Type of Collocation	Meets the definition of Fiber Based Collocator Yes/No
[REDACTED]	UT	AMFKUTMA	American Fork	Caged	Yes
[REDACTED]	WA	RNTNWA01	Renton	Caged (2)	No – Collocation if fed by CenturyLink Unbundled Dark Fiber
[REDACTED]	WA	SPKNWAFA	Spokane Fairfax	Cageless	Yes
[REDACTED]	WA	SPKNWAHD	Spokane Hudson	Caged	Yes
[REDACTED]	WA	SPKNWAKY	Spokane Keystone	Caged	Yes
[REDACTED]	WA	SPKNWAWA	Spokane Walnut	Caged	Yes
[REDACTED]	WA	SPKNWAWH	Spokane Whitehall	Cageless	Yes
[REDACTED]	WA	TACMWAFA	Tacoma Fawcett	Caged	No – Collocation if fed by CenturyLink Unbundled Dark Fiber. [REDACTED] is an [REDACTED] affiliate therefore its Yakima Fawcett collocation is not counted as a separate fiber based collocator.
[REDACTED]	WA	TACMWAFA	Tacoma Fawcett	Caged (2)	Yes
[REDACTED]	WA	YAKMWA02	Yakima Chestnut	Cageless	No – [REDACTED] is an [REDACTED] affiliate therefore its Yakima Chestnut collocation is not counted as a separate fiber based collocator.
[REDACTED]	AZ	PHNXAZCA	Phoenix Cactus	Caged	Yes
[REDACTED]	UT	KYVLUTMA	Kaysville	Caged	No – Collocation if fed by CenturyLink Unbundled Dark Fiber.
[REDACTED]	WA	YAKMWA02	Yakima Chestnut	Cageless	Yes

Please let me know if you have any questions or concerns – Thank you.

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From: mailouts2@centurylink.com [mailto:mailouts2@centurylink.com]

Sent: Monday, May 11, 2015 12:46 PM

To: [REDACTED]

Subject: CLEC Legal Ownership Information and Fiber-based Collocation Validation - Action Requested



received 6/23

June 12, 2015

CERTIFIED MAIL WITH RETURN RECEIPT

Renee Albersheim
CenturyLink
930 15th Street, 6th Floor
Denver, CO 80202

Re: CLEC Legal Ownership Information and Fiber-based Collocation Validation

Dear Ms Albersheim:

This letter responds to the CenturyLink notification referenced above and titled "CLEC Legal Ownership Information and Fiber-based Collocation Validation – Action Requested" (the "CenturyLink Notice"). [REDACTED] has reviewed the table of wire centers included in the CenturyLink Notice, against the criteria provided in the CenturyLink Notice (from 47 CFR Section 51.5). [REDACTED] confirms that its certificated [REDACTED] CLEC affiliates in each of the states listed in the CenturyLink Notice is a fiber-based collocator in the wire centers listed in the CenturyLink Notice.

Sincerely,

[REDACTED]