QWEST CORPORATION
STATE: Washington
DOCKET NO: UT-053025
CASE DESCRIPTION: Investigation concerning the status of competition and impact of the FCC's Triennial Review Remand Order on the competitive telecommunications environment in Washington State
INTERVENOR: Bench Requests
REQUEST NO: BCH 01-001

REQUEST:

Please provide a list of wire centers in the Company's service territory in Washington that will be designated as "non-impaired" pursuant to the final rule in Appendix B of the FCC's Triennial Review Remand Order (TRRO) and specifically identify each wire center on the list for DS1 and DS3 Loops, and DS1, DS3 and Dark Fiber transport.

RESPONSE:

Following is a list of the wire centers in Qwest's service territory in Washington that are designated as non-impaired pursuant to 47 C.F.R. §51.319.

WIRE CENTER	WIRE CENTER CLLI8 CODE	WIRE CENTER CLASSIFICATION	NO IMPAIRMENT FOR THE FOLLOWING LOOP FACILITIES:
Bellevue Sherwood	BLLVWASH	Tier 1	
Kent O'Brien	KENTWAOB	Tier 1	
Olympia Whitehall	OLYMWA02	Tier 1	
Spokane Riverside	SPKNWA01	Tier 1	
Seattle East	STTLWA03	Tier 1	
Seattle Atwater	STTLWA05	Tier 1	
Seattle Main/Mutual	STTLWA06	Tier 1	DS1/DS3 Loops
Seattle Campus	STTLWACA	Tier 1	
Seattle Elliott	STTLWAEL	Tier 1	
Bellevue Glencourt	BLLVWAGL	Tier 2	
Seattle Cherry	STTLWACH	Tier 2	
Seattle Dumwamish	STTLWADU	Tier 2	
Tacoma Fawcett	TACMWAFA	Tier 2	

For DS1 unbundled dedicated transport relief, the FCC Rule requires that both ends of a requested route/circuit must be classified as Tier 1 wire centers. Tier 1 wire centers are those wire centers that contain at least four (4) fiber-based collocators, 38,000 business lines, or both. As an example, Qwest is relieved of its DS1 unbundled dedicated transport obligations for circuits between Seattle East and Seattle Main/Mutual because each of those Wire Centers meets the FCC's criteria to be classified as a Tier 1 wire center.

For DS3 unbundled dedicated transport relief, the FCC Rule requires that both ends of a requested route/circuit must be classified as either a Tier 1 or a Tier 2 wire center. Tier 2 wire centers are those wire centers that contain at least four (4) fiber-based collocators, 24,000 business lines, or both. This same criteria also applies to relief for unbundled dark fiber transport. As an example, Qwest is relieved of its DS3 unbundled dedicated transport/dark fiber transport obligations for circuits between Seattle Elliott and Bellevue Glencourt because both of those wire centers are classified as Tier 2 wire centers. Qwest would also be relieved of its DS3 unbundled dedicated transport/dark fiber transport obligation between Seattle Elliott and Seattle Main/Mutual because each end of the circuit is located in a wire center that meets the FCC's criteria as either a Tier 1 or a Tier 2 wire center. Tier 1 wire centers, by definition, also qualify as Tier 2 wire centers.

For unbundled DS1 loop relief, the FCC's rules require that a wire center must have at least 60,000 business lines AND at least four (4) fiber-based collocators. For unbundled DS3 loop relief, the FCC's rules require that a wire center must have at least 38,000 business lines AND at least four (4) fiber-based collocators. Applying this criteria to its Washington wire centers, Qwest is relieved of its obligation to provide DS1 and DS3 loops in only one wire center - Seattle Main/Mutual.

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INTERVENOR: Bench Requests
REQUEST NO: BCH 01-002

REQUEST:

Please identify for each wire center whether it is classified as a tier 1 or tier 2 wire center, and whether the calculation is based on the number of fiber-based collocators (include the names of the collocators), or the number of business lines (line counts by each carrier) or both.

RESPONSE:

See the tier designation provided as Attachment A for a list of each wire center, its wire center classification and whether the calculation is based on the number of fiber-based collocators, the number of business lines, or both.

For a list of the fiber-based collocators and the number of fiber-based collocators in each Non-impaired wire center, please see Confidential Attachment B.

See Confidential Attachment C for a list of the business line counts for each CLEC. The line counts for each CLEC are provided in masked format and Qwest has provided the Washington Staff only with a copy of the masking key. Separately, each CLEC will be provided its own data in an un-masked format.

It should be noted that some carriers, such as Qwest, have not previously tracked whether a UNE-P line is used to serve business or residential customers. However, since UNE-P lines each have an associated telephone number, a reasonable estimate of residential and business UNE-P lines can be developed by determining whether the UNE-P telephone numbers appear in the residential section of the white pages telephone directory database. In view of the fact that the majority of residential lines are listed in the telephone directory, while a much lower proportion of business lines are listed (and reliance of business UNE-P listings would therefore significantly undercount actual business UNE-P lines in service), Qwest estimated UNE-P business lines by simply deducting UNE-P residential telephone number listings from total UNE-P lines in service, with the remainder attributed to business. Each 64 kbps-equivalent was counted as one line. As a result, the UNE-P business line count is provided at the wire center, rather than CLEC-specific basis. Consistent with the ARMIS data, all UNE-P data reported was current as of December 2003.

See Attachment D which provides UNE-P by wire center and the number of UNE-P lines. The line counts in Attachments C and D, coupled with the Qwest line counts provided in response to BCH 01-003(vii) produce the total line counts Qwest relied upon in determining tier designation for each wire center (provided in response to BCH 01-003(v)).

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INTERVENOR: Bench Requests
REQUEST NO: BCH 01-003

REQUEST:

For each of the wire centers listed as "non-impaired", please provide a descriptive explanation and data necessary for the Commission and other participants to validate. The underlying data, at minimum, should include the following:

(i) The total number of fiber-based collocators as defined in 47 C.F.R. § 51.5.

(ii) The date on which the number of fiber-based collocators was determined.

(iii) The name of each fiber-based collocator.

(iv) If the ILEC requested affirmation from a carrier regarding whether or not the carrier, if included in part (iii) above, was a fiber-based collocator, please provide documents to support whether the carrier affirmed, denied or did not respond to the ILEC's request.

(v) The total number of business lines as defined in 47 C.F.R. § 51.5.

(vi) The date on which the business line counts data was calculated. Note: If different components of the business line counts come from sources representing different points in time, then each component should be identified and the corresponding date for each component provided.

(vii) Total ILEC business switched access lines.

(viii) If the methodology used to determine the line counts in (vii) above differ from the methodology used to determine switched business line counts for ARMIS 43-08, describe the differences and any data that would allow the Commission or participants to reconcile this data.

(ix) Total UNE Loops for each CLEC.

(x) Number of UNE Loops, for each CLEC, provided in combination with ILEC switching (e.g. UNE-P, QPP, or other ILEC Commercial arrangement).

(xi) Number of UNE Loops, for each CLEC, where the ILEC does not provide switching.

(xii) If different from (x) above, the number of business loops, for each CLEC, provided in combination with ILEC switching (e.g. UNE-P, QPP, or other ILEC Commercial arrangement). If this information is not available, indicate whether the response to (x) includes both business and residential loops.

(xiii) If different from (xi) above, the number of switched business loops, for each CLEC, where the ILEC does not provide switching. If this information is not available, indicate whether the response to (xi) includes both business and residential loops, switched and non-switched loops.

(xiv) If the total of UNE Loops in (x) and (xi) above does not equal (ix) above, explain the difference, including any data that would allow participants to reconcile this data.

(xv) Provide all underlying data, calculations and any description used to count digital access lines on a 64-kbps-equivalent basis for the counts in (vii) and (xi) above.

(xvi) Verify that line counts associated with remote switch locations are associated with the remote and not the host switch. If this is not the case, explain why not.

RESPONSE:

On February 4, 2005, the FCC sent a letter to each of the RBOCs requesting that they file, by February 18, 2005, a list of the wire centers each of their respective in-region operating territories that satisfied the FCC's Tier 1, Tier 2 and Tier 3 criteria for dedicated transport and that satisfied the non-impairment thresholds for DS1 and DS3 loops in the Triennial Review Remand Order (TRRO). Given the time constraints associated with the February 2005 filing, if Qwest was unable to physically verify the specifics associated with a particular collocation (again, because of limited time), that collocation was not included in the count.

Business Lines
FCC Rule §51.5 defines "Business Line" as follows:

> A business line is an incumbent LEC-owned switched access line used to serve a business customer, whether by the incumbent LEC itself or by a competitive LEC that leases the line from the incumbent LEC. The number of business lines in a wire center shall equal the sum of all incumbent LEC business switched access lines, plus the sum of all UNE loops connected to that wire center, including UNE loops provisioned in combination with other unbundled elements. Among these requirements, business line tallies (1) shall include only those access lines connecting end-user customers with incumbent LEC end-offices for switched services, (2) shall not include non-switched special access lines, (3) shall account for ISDN and other digital access lines by counting each 64 kbps-equivalent as one line. For example, a DS1 line corresponds to 24 64 kbps-equivalents and therefore to 24 "business lines."

When Qwest refers to Business Lines in its responses to these bench requests, it is using the term consistent with the above definition.

Consistent with the FCC's Triennial Review Remand Order (Order), Qwest determined the number of Business Lines in each wire center using a combination of sources. As the Commission found in the Order, the number of Business Lines in a wire center is based on the ARMIS data "that incumbent LECs have already created." (¶ 105) As of the effective date of the Order, the most current ARMIS data is that which was filed on April 1, 2004, for data that was current as of December 2003.

The "Business Switched Access Line" data comes from ARMIS 43-08, Table III - "Access Lines in Service By Customer", Column c ("Single Line Business Switched Access Lines"), Column d ("Multiline Business Switched Access Lines") and Column e ("Payphone Lines"). Consistent with the FCC's rules, each ISDN or other digital access line was counted on a per-64 kbps-equivalent. Official Company Service lines were not included in this data. Qwest utilizes unique Universal Service Order Codes (USOCs) to identify which of the services reported in ARMIS are Switched/Non-Switched and Business or Residence.

As the FCC found in the Order, all UNE-loops are included in the business lines counts for a wire center. (¶ 105) UNE loops connected to a wire center, including UNE loops provisioned in combination with other unbundled elements

(e.g., EELs and business UNE-P lines) were included in the UNE loop data. Each 64 kbps-equivalent has been counted as one line. Consistent with the ARMIS data, all UNE loop data reported was current as of December 2003.

Some carriers, such as Qwest, have not previously tracked whether a UNE-P line is used to serve business or residential customers. However, since UNE-P lines each have an associated telephone number, a reasonable estimate of residential and business UNE-P lines can be developed by determining whether the UNE-P telephone numbers appear in the residential section of the white pages telephone directory database. In view of the fact that the majority of residential lines are listed in the telephone directory, while a much lower proportion of business lines are listed (and reliance of business UNE-P listings would therefore significantly undercount actual business UNE-P lines in service), Qwest estimated UNE-P business lines by simply deducting UNE-P residential telephone number listings from total UNE-P lines in service, with the remainder attributed to business. Each 64 kbps-equivalent has been counted as one line. Consistent with the ARMIS data, all UNE-P data reported was current as of December 2003.

Fiber-Based Collocators.
Qwest verified the number of collocation arrangements that satisfy the Order's definition of "fiber-based collocator" for each wire center that would qualify for unbundling relief for high capacity loops or transport based on the nonimpairment standards adopted in the Order. In §51.5, the FCC defined Fiber-based Collocator as:

> A fiber-based collocator is any carrier, unaffiliated with the incumbent LEC, that maintains a collocation arrangement in an incumbent LEC wire center, with active electrical power supply, and operates a fiber-optic cable or comparable transmission facility that (1) terminates at a collocation arrangement within the wire center; (2) leaves the incumbent LEC wire center premises; and (3) is owned by a party other than the incumbent LEC or any affiliate of the incumbent LEC, except as set forth is this paragraph. Dark fiber obtained from an incumbent LEC on an indefeasible right of use basis shall be treated as non-incumbent LEC 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 purposes of this paragraph, the term affiliate is defined by 47 U.S.C. §153(1) and any relevant interpretation in this Title.

Qwest used an internal database that tracks all CLEC-submitted and approved collocation requests to develop a list of fiber collocations. This list was then edited to remove all collocations that did not have a record indicator for fiber entrance facilities. The edited list was sent to the Collocation Project Management Center (CPMC) for verification that there was active power in those collocations and it was matched against their records for collocations for which power billing was indicated. Next, the wholesale markets team validated this list against February 2005 billing data, and provided confirmation that the carrier was being billed for collocation. The resulting list was physically verified by Central Office Technicians and State Interconnection Managers. As noted above, if the field forces were unable to confirm a particular collocation, that collocation was not included in the list of collocations.

On March 29, 2005, Qwest initiated a three-step process to ensure the accuracy of its wire center data. First, Qwest provided access for CLECs and state public service commission staff to the confidential data underlying the February 18 lists of Qwest wire centers meeting the non-impairment thresholds in the TRRO. The confidential data were made available pursuant to the terms of the applicable protective order and included the following information for each wire center identified in one or both of the February 18 lists:

- ARMIS 43-08 business line information
- UNE-P lines
- UNE-loop data
- fiber-based collocator information

Second, Qwest sent a letter to each CLEC advising them of the wire centers in which Qwest's records showed the CLEC had a fiber-based collocation. In the letter, Qwest requested that the CLEC make sure its records agreed with Qwest's records and, if there was a discrepancy, that the CLEC provide documentation to Qwest regarding the collocation in question. Qwest requested that any such documentation be provided by Tuesday, April 12, 2005. This process is similar to that employed by the Federal Communications Commission in the pricing flexibility dockets to verify the accuracy of the fiber-based collocation information relied on in those proceedings. In light of the highly sensitive nature of the fiber-based collocation information, Qwest allowed each fiber-based collocator access only to its own fiber-based collocation information in the relevant wire centers.

Third, Qwest conducted a further internal check of the fiber-based collocation and line count data used to generate the February 18 wire center lists, including a comprehensive review of the fiber-based collocation arrangements in Qwest's wire centers.

Through this verification process, Qwest identified a number of data inaccuracies in the lists of non-impaired wire centers submitted on February 18. First, Qwest discovered that, in some cases, it had counted a fiber-based collocator twice because the Qwest records used for the February 18 filing did not reflect the affiliation of that collocator with another fiber-based collocator in that wire center. In several cases, CLECs notified Qwest of these affiliations in response to the fiber-based collocation information provided by Qwest in the March 29 letter noted above. To address any lingering concerns of double counting, Qwest checked other data sources to determine potential affiliations and then sent letters to the affected carriers requesting verification of those or any other affiliations. Second, Qwest found that, in a small number of cases, fiber-based collocation arrangements using dark fiber transport leased from Qwest had been counted as fiber-based collocations, due to inaccuracies in service orders. Qwest removed those fiber-based collocations from the list of fiber-based collocators. Third, Qwest discovered that certain fiber-based collocation arrangements counted in the February 18 filing had been decommissioned or otherwise were not operational. Qwest removed these collocations from its list of fiber-based collocators. Fourth, Qwest identified additional fiber-based collocators that it had not counted as fiber-based collocators for purposes of the February filing. As noted earlier, due to the compressed timeframe for the inspections in February, Qwest ignored numerous fiber-based collocation arrangements that could not readily be verified as fiber-based collocators at that time. Upon further investigation in April and May, Qwest was able to confirm that some of these arrangements did in fact qualify as fiber-based collocation arrangements.

Based on the above, on July 8, 2005 Qwest updated its Wire Center list to reflect the validated results.

(i) See Attachment B provided in response to BCH 01-002 which includes a list of all fiber based fiber-based collocators located in the non-impared wire centers.

(ii) The list of fiber based fiber-based collocators was finalized after verification on June 24, 2005. The list was based on fiber-based collocations in existence as of December 2003.

(iii) See Attachment B provided in response to BCH 01-002 which includes a list of all fiber-based collocators in the non-impaired wire centers.

(iv) See Confidential Attachment A which lists the fiber-based collocators who were notified, whether they responded to the notice, and the resolution of the response. Please note that Qwest also has the underlying e-mails and correspondence from the CLECs which were used to develop Confidential Attachment A, however, that back-up correspondence contains information that is not relevant to Washington, is burdensome, and is not likely to provide any additional information pertaining to the exchange between CLECs and Qwest.

(v) See Confidential Attachment B which includes a list of all business line counts in the non-impaired wire centers.

(vi) Business line totals were based on December 2003 date.

(vii) See Confidential Attachment C for total ILEC business switched access lines.

(viii) In ARMIS 43-08, Qwest reports the number of circuits attributed to DS1 and DS3s based on the actual channels used by the customer. The methodology dictated by FCC rule for counting DS1 and DS3 circuits under the TRRO is different. Rather than counting the actual number of circuits activated, the FCC rule requires that the count include the full capacity of the DS1 or DS3. Therefore, a DS1 circuit was counted as the equivalent of 24 business lines, and a DS3 was counted as 672 business lines. Qwest removed the ARMIS count of DS1 and DS3, and replaced them with the FCC capacity amount to avoid double counting. Please see Confidential Attachment D for underlying data.

(ix) See Confidential Attachment C provided in response to BCH 01-002.

(x) Qwest, has not previously tracked whether a UNE-P line is used to serve business or residential customers. However, since UNE-P lines each have an associated telephone number, a reasonable estimate of residential and business UNE-P lines can be developed by determining whether the UNE-P telephone numbers appear in the residential section of the white pages telephone directory database. In view of the fact that the majority of residential lines are listed in the telephone directory, while a much lower proportion of business lines are listed (and reliance of business UNE-P listings would therefore significantly undercount actual business UNE-P lines in service), Qwest estimated UNE-P business lines by simply deducting UNE-P residential telephone number listings from total UNE-P lines in service, with the remainder attributed to business. Each 64 kbps-equivalent was counted as one line. As a result, the UNE-P business line count is provided at the wire center, rather than CLEC-specific basis. Additionally, please see Confidential Attachment D provided in response to BCH 01-002.

(xi) See Confidential Attachment C provided in response to BCH 01-002.

(xii) There is no difference.

(xiii) There is no difference.

(xiv) As noted above, Qwest is only able to provide UNE-P data by Wire Center, and not CLEC for item (x), therefore item (ix) is equal to (xi).

(xv) See Confidential Attachment E for the underlying data and calculations used to count the 64 kbps-equivalents for the response to (vii) - ILEC business switched access lines. The requested information was provided in conjunction with the response to (xi). See also the response to (viii) above.

(xvi) Qwest did not have any host/remote arrangements in the Washington non-impaired wire centers with CLEC presence.

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REQUEST NO: BCH 01-004

REQUEST:

If the calculation of number of lines (or inclusion of certain lines) is based on a directive from the FCC as Qwest has indicated during the workshop, please provide the detailed citations of the FCC's decision(s).

RESPONSE:

The directive from the FCC can be found at FCC-04-290 "Triennial Review Order on Remand", Appendix B, Final Rules section 51.5, definition of "business line." See also, paragraph 105 of that same order for the FCC's discussion of the methodology for the business line count.