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By Electronic Mail
Original via U.S. Mail

Ms. Lisa Anderl
Qwest Corporation
1600 Seventh Avenue, Room 3206
Seattle, WA 98191

Re: New Cost Proceeding, Docket No. UT-003013

Dear Lisa:

As reflected in Jeff Hubbard's testimony in Part D of the above-referenced proceeding, Qwest and XO personnel have been discussing how Qwest should provide collocation entrance facilities to a CLEC in the rare instances in which Manhole 1 lacks sufficient capacity to enable the CLEC to bring its fiber into the central office through Manhole 1. XO's understanding is that in those circumstances, Qwest is willing to permit the CLEC to bring its fiber into the Qwest central office through a Manhole 2, *i.e.*, an existing manhole in Qwest's network that has one or more conduits into Manhole 1 with sufficient capacity to accommodate the CLEC's fiber.

Under this proposal, the CLEC would bring its fiber into Manhole 2, and Qwest would pull that fiber through the conduit between Manhole 2 and Manhole 1, and would continue to pull the fiber through the conduits between Manhole 1, Manhole 0, and the cable vault in the central office, and from the cable vault to the CLEC's collocation space. The recurring and nonrecurring charges the Commission established for entrance facilities would increase for these entrance facilities to reflect the CLEC's use of the additional manhole and conduit. That increase would be calculated based on the costs in Qwest's cost study attributable to the CLEC's share of Manhole 1 and the conduit between Manhole 1 and Manhole 0 (to recover the costs of the CLEC's use of Manhole 2 and the conduit between Manhole 2 and Manhole 1).

XO agrees that this proposal is reasonable from both a technical and financial perspective and that Commission acceptance of this proposal would resolve the parties' outstanding issue with respect to collocation entrance facilities.

We appreciate the efforts of both parties to reach a negotiated resolution of this issue. Please contact me if you have any questions about XO's position.

Very truly yours,

Davis Wright Tremaine LLP

Gregory J. Kopta

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