

## **Process for Identifying and Validating Fiber-Based Collocators in Qwest's Washington Wire Centers.**

In developing a list of fiber-based collocators in Qwest wire centers in the state of Washington, Qwest utilized a 3 pronged approach. Qwest; 1) compiled a preliminary list utilizing inventory databases to identify collocators, 2) requested confirmation from said collocators of its findings, and 3) conducted field verifications.

### Identification of Preliminary List

Qwest employed an internal database that tracks all CLEC-submitted and approved collocation requests to develop a list of fiber-based collocators, utilizing criteria set forth in the TRRO in defining a fiber-based collocator<sup>1</sup>. This list was then edited to extract all collocations that did not have a record indicator for fiber entrance facilities (as this would be an indicator that the fiber was being provided by a carrier other than Qwest or one of its affiliates). After edits were completed, the resulting list was sent to Qwest's Collocation Project Management Center ("CPMC") for verification that there was active power in those collocations. The CPMC verified the presence of active power through records indicating billing for power usage. Next, Qwest validated the list against February 2005 billing data, providing confirmation that the carrier was indeed being billed for collocation. The resulting list was further verified, on a local basis, by Qwest Central Office Technicians and State Interconnection Managers. If network field personnel were unable to confirm a particular collocation, based on their records or personal knowledge of their particular wire centers, Qwest did not include that collocation in its initial February 2005 list.

Finally, Qwest analyzed the resulting list to ensure that multiple collocations at a single wire center by the same or affiliated carriers, or multiple collocations by a single carrier, were counted as only one fiber-based collocator. The number of fiber-based collocators in any given wire center was counted as of the date of the TRRO's release, February 2005. The resulting list was filed with the FCC on February 18, 2005.

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<sup>1</sup> The TRRO was quite specific in defining what constituted a "fiber-based collocator." It defined a fiber-based collocator as any carrier, unaffiliated with the incumbent LEC, that maintains a collocation arrangement in an incumbent LEC wire center, with active electrical power supply, and that 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. (TRRO, ¶ 102.) Dark fiber obtained from an incumbent LEC on an indefeasible right of use ("IRU") basis is treated as non-incumbent LEC fiber-optic cable. (TRRO, ¶ 102, fn. 292.) Two or more affiliated fiber-based collocators in a single wire center are collectively counted as a single fiber-based collocator. (TRRO, ¶ 102; see also 47 CFR § 51.5 ("Rule 51.5").) Fixed-wireless collocation arrangements are included "if the carrier's alternative transmission facilities both terminate in and leave the wire center." (TRRO, ¶ 102.) Finally, a competitor's collocation arrangement counts toward the qualification of a wire center for a particular tier irrespective of the services that the competing carrier offers. (*Id*)

### Confirmation Letters are Sent to CLECs

As further verification of the accuracy of its initial list, on March 29, 2005, Qwest sent a letter to each CLEC advising them of the wire centers in which Qwest showed the CLEC to have a fiber-based collocation as reflected by the data on the initial list. In this letter, Qwest requested that the CLEC validate that 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 April 12, 2005.

Qwest's response to Bench Request 2, Docket Ut-053025, information request no. 3(iv) details the correspondence between Qwest and fiber-based collocators in Washington and any resolution that might have been necessary.

### Physical Field Verifications Conducted

Lists of Tier 1 and Tier 2 fiber-based collocations were sorted by wire center. For each wire center, all identified fiber-based collocations were entered into a template spreadsheet. The spreadsheet included the parameters which were to be verified, taken directly from the criteria set forth in the TRRO in defining a fiber-based collocation. The purpose of the spreadsheet was to facilitate the documentation of the following via field verifications:

- a. Verification of Operator/Carrier Name. What name, if any, was stenciled on the collocation space? If stenciled, did the name on the space match that of the operator/carrier on record?
- b. Verification of Power. Upon visual inspection, was there active power to the collocation space? Were complete electrical circuits in place to Qwest power systems? If possible, could billing be verified?
- c. Verification of Fiber Facilities. Could fiber be visually verified? Was it an express fiber<sup>2</sup>? Upon a visual inspection, did the fiber terminate on equipment within the collocation space? Did the fiber leave the wire center premises?

The physical verification of each wire center was intended to not only validate the inclusion of the collocators already identified, but also to allow for the identification and addition of collocations that had not previously been included.

During the first week of June, 2005, Qwest sent the template spreadsheet document to its Washington central office field personnel and directed them to *physically* inspect the identified wire centers to: (1) verify the information for the fiber-based collocations identified and listed in the initial FCC filing; (2) add any fiber-based collocations that met the criteria but that were not captured in the initial list, and to document the criteria; (3) investigate any issues raised by the by

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<sup>2</sup> Express fiber is a CLEC provided fiber that is brought directly in to the collocation with no Qwest provided entrance facility.

the CLECs in their responses to Qwest's letter; and (4) provide any pertinent anecdotal information or comments regarding any of the collocations. Confidential Attachment A contains the completed spreadsheet documents containing all off the above information by wire center.

Qwest then edited the initial list of fiber-based collocators to reflect the information gathered through the physical field verifications. This verified list was used in determining the list of Qwest non-impaired wire centers in Washington that Qwest filed with the FCC on July 8, 2005.

### **Fiber-Based Collocator Data in Wire Centers the State of Washington**

Qwest has identified a total of nine Tier 1 wire centers and four Tier 2 wire centers. However, the Joint CLEC's in their Final Exceptions and Objections to Qwest's data disputed the designation of only two of those wire centers, Bellevue Sherwood and Olympia Whitehall.

Table 1 below depicts the qualifying fiber-based collocators by wire center for the two wire centers in question. The total number of fiber based collocators and their Tier designations are shown in the green highlighted rows.

For each wire center, all fiber-based collocators are identified. The table also indicates if a fiber-based collocator was physically field verified and if the collocator was being billed by Qwest for the collocation space. It also states under what name the collocator is being billed if there are multiple names for the collocator.

Identified in red are corrections to the fiber-based collocator information that was filed with the FCC. These changes are a result of further investigation by Qwest after the wire center designations were challenged by the Joint CLECs. In Bellevue Sherwood, the collocator was mislabeled as SBC, when in reality it was McLeod. This does not change the total number of collocators nor the Tier designation. In Olympia Whitehall, one collocator, Northwest Open Access Network, was removed when provisioning documents showed that the collocation was put into operation after March 11, 2005. While the total number of fiber-based collocators was reduced by one, the Tier designation for Olympia Whitehall remains unchanged.

Table 1

	WC CLLI	CLEC Name	State	CO Name	Field Verified	Billing Verified	Comments	Total Collos by WC	Tier
1	BLLVWASH	XO Communications fka Allegiance Telecom, Inc.	Washington	BELLEVUE - SHERWO	y	y - Allegiance			
1	BLLVWASH	XO Communications fka Next Link	Washington	BELLEVUE - SHERWO	y	y - Nextlink			
2	BLLVWASH	Level 3 Communications	Washington	BELLEVUE - SHERWO	y	y			
3	BLLVWASH	McLeod <del>SBC-Telecom</del>	Washington	BELLEVUE - SHERWO	y	y - McLeod	Collo mislabeled as SBC		
4	BLLVWASH	WiiTel Local Network LLC fka Williams Local Network	Washington	BELLEVUE - SHERWO	y	y - Williams			
5	BLLVWASH	Sprint	Washington	BELLEVUE - SHERWO	y	y			
6	BLLVWASH	MCI - MFS Intelenet	Washington	BELLEVUE - SHERWO	y	y - MFS			
7	BLLVWASH	AT&T dba Teleport Communications Group (TCG)	Washington	BELLEVUE - SHERWO	y	y - TCG			
	BLLVWASH		Washington	BELLEVUE - SHERWO				7	1
1	OLYMWA02	Echelon dba Advanced Telcom Group, Inc.	Washington	OLYMPIA - WHITEHA	y	y = ATG			
2	OLYMWA02	Electric Lightwave (ELI)	Washington	OLYMPIA - WHITEHA	y	y			
	<del>OLYMWA02</del>	<del>Northwest Open Access Network</del>	<del>Washington</del>	<del>OLYMPIA - WHITEHA</del>	<del>y - FGG</del>	n/a	Remv'd. In service after March 11.		
3	OLYMWA02	TSS Digital Services	Washington	OLYMPIA - WHITEHA	y	y			
4	OLYMWA02	AT&T dba Teleport Communications Group (TCG)	Washington	OLYMPIA - WHITEHA	y	y - TCG			
	OLYMWA02		Washington	OLYMPIA - WHITEHA				(5) 4	1

## **Existence of Competitive Fiber Networks in the State of Washington**

Further substantiation of the presence of fiber-based competition in Washington is the existence of various competitive fiber networks throughout the state. Not coincidentally, these networks are operated by several of the same fiber-based collocators that have been identified by Qwest. Furthermore, information supplied by various CLECS themselves illustrates not only the availability of competitive fiber facilities but its use.

Attachment B is a map that illustrates the location of non-Qwest competitive fiber facilities in the state of Washington. The map shows only Seattle/Tacoma wire center topography. At the time this response was filed, Qwest had not received current data for the Olympia and Spokane wire centers. The map was produced using information provided by GeoTel Communications, Inc. ("GeoTel"). GeoTel is a leading provider of telecommunications infrastructure data in a geographic information system (GIS). Its dataset contains metro fiber routes for cities in the United States and layered on street files for enhanced study. This data has been used by RBOCs as well as other private and government entities in various applications such as network planning, competitive analysis, urban planning and economic development. Over 285 carriers in approximately 180 CBSAs are included in the dataset with additional markets added semi-annually.

As can clearly be seen in Attachment B, an extensive fiber network exists in the state of Washington that was put in place by carriers other than Qwest and its affiliates. A number of those same carriers have been identified as being fiber-based collocators in Qwest wire centers. It is only logical to assume that those fiber-based collocators do, in fact, connect to their fiber network.

Highly Confidential Attachments C-J contain responses to discovery requests issued to CLECs that Qwest had been identified as fiber-based collocators during the TRO proceedings in Washington, late 2003. These requests for information were an effort to determine the extent to which CLECs, collocating in Qwest wire centers, were using fiber facilities that were either self-provisioned or obtained from a provider other than Qwest. As is clear when reading the CLECs responses, not only is the competitive fiber identified in Attachment B available to CLECs, they are using it as part of their fiber-based networks or supplying fiber capacity to other carriers.