

**BEFORE THE WASHINGTON STATE  
UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of the Petition of	)	DOCKET UT-073033
	)	<i>(Bifurcated)</i>
QWEST CORPORATION,	)	
	)	ORDER 10
For Commission Approval of 2007	)	
Additions to Non-Impaired Wire Center	)	INITIAL ORDER GRANTING
List	)	PETITION FOR APPROVAL OF
	)	ADDITIONS TO NON-IMPAIRED
	)	WIRE CENTER LIST
	)	
.....	)	

1 **SYNOPSIS.** *This is an Administrative Law Judge’s Initial Order that is not effective unless approved by the Commission or allowed to become effective pursuant to the notice at the end of the Order. If this Initial Order becomes final, Qwest Corporation’s petition to designate additional wire centers in Washington as non-impaired would be granted. Appendix A, attached to this decision, identifies the additional wire centers designated as non-impaired and their classification as Tier 1 or Tier 2 wire centers. Appendix B, attached to this decision, identifies all Qwest wire centers in Washington designated as non-impaired and their Tier classification.*

**MEMORANDUM**

2 **PROCEEDING.** Docket UT-073033 involves a filing by Qwest Corporation (Qwest) to designate additional wire centers in Washington as non-impaired.<sup>1</sup> If a wire center is designated as non-impaired, Competitive Local Exchange Carriers (CLECs) would not be impaired in providing telecommunications service without access to such network elements at Total Element Long Run Incremental Cost (TELRIC) rates.<sup>2</sup> Qwest proposes to designate its Bellevue Glencourt, Orchards, and

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<sup>1</sup> A glossary of terms used in this Order is attached as Appendix C to the Order  
<sup>2</sup> TELRIC refers to Total Element Long Run Incremental Cost, a methodology based on forward-looking long run economic cost which the FCC adopted for pricing unbundled network elements provided under Section 251 of the Telecommunications Act of 1996.

Spokane Walnut wire centers in Washington as non-impaired and assign a Tier level to each. The Bellevue Glencourt wire center would be designated as Tier 1; the Orchards and Spokane Walnut wire centers as Tier 2.

3 **APPEARANCES.** Lisa A. Anderl, Associate General Counsel, Seattle, Washington, represents Qwest. Gregory J. Kopta, attorney, Davis Wright Tremaine, LLP, Seattle, Washington, represents Covad Communications Company, McLeodUSA Telecommunications Services, Inc., Eschelon Telecom, Inc., Integra Telecom of Washington, Inc., and XO Communications Services Inc.

4 **BACKGROUND.** In its Triennial Review Remand Order (TRRO), the Federal Communications Commission (FCC) reexamined whether competitors were impaired without access to certain unbundled network elements under Section 251(c)(3) of the Telecommunications Act of 1996 (The Act).<sup>3</sup> The FCC concluded that it would assess whether competitors were impaired without unbundled access to high-capacity loops and inter-office transport by reviewing the number of fiber-based collocators in a wire center and the number of business lines terminating in and leaving a wire center as indicia of competition. The FCC developed three tiers to classify wire centers.<sup>4</sup> The most competitive wire centers, Tier 1, have four or more fiber-based collocations and a minimum of 38,000 business lines. Tier 2 wire centers have three or more fiber-based collocations and a minimum of 24,000 business lines. Tier 3 wire centers are all wire centers not otherwise classified.<sup>5</sup> The FCC concluded that if a wire center meets the foregoing criteria, CLECs would not be impaired in providing telecommunications service without access to such network elements at TELRIC rates.

5 The Washington Utilities and Transportation Commission (Commission) also addressed CLEC access to high capacity transport and loops in wire centers owned or

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<sup>3</sup> *In the Matter of Unbundled Access to Network Elements; Review of the Section 251 Unbundling Obligations of Incumbent Local Exchange Carriers*, WC Docket 04-313, CC Docket 01-338, Order on Remand, FCC 04-290 (rel. February 4, 2005). (*Triennial Review Remand Order or TRRO*)

<sup>4</sup> See n. 3.

<sup>5</sup> *Id.*

controlled by Incumbent Local Exchange Carriers (ILECs).<sup>6</sup> At the conclusion of its investigation, this Commission issued an interpretative statement and established the methodology for counting business lines, the terms governing collocation, and the effective date of any designations of wire centers as non-impaired.<sup>7</sup> Finally, the Commission identified the Qwest wire centers in Washington that met the FCC's non-impairment criteria and designated the Tier level for each non-impaired wire centers.<sup>8</sup>

6 The foregoing methodology for counting business lines for the purpose of designating wire centers as non-impaired and the terms governing collocation were modified by a settlement agreement accepted by the Commission in Docket UT-073035.<sup>9</sup>

7 **PROCEDURAL HISTORY.** On June 22, 2007, Qwest filed with the Commission a request for approval to designate additional wire centers as non-impaired. If approved, the Bellevue Glencourt wire center would be designated as Tier 1, the Orchards wire center would be designated as Tier 2, and the Spokane Walnut wire center would be designated as Tier 2. That request was assigned Docket UT-073033. On the same date, Qwest and the Joint CLECs<sup>10</sup> filed in Docket UT-053025 a joint petition for approval of a Settlement Agreement (Settlement) resolving issues concerning the status of competition and the impact of the FCC's TRRO on the competitive telecommunications market in Washington. That filing was subsequently withdrawn and refiled on June 29, 2007, as a new case in Docket UT-073035.<sup>11</sup>

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<sup>6</sup>*In the Matter of the Investigation Concerning the Status of Competition and Impact of the FCC's Triennial Review Remand Order on the Competitive Telecommunications Environment in Washington State*, Docket UT-053025.

<sup>7</sup>Orders 04 and 06 Interpretative Statement entered, in Docket UT-053025.

<sup>8</sup> *Id.*

<sup>9</sup>Docket UT-073035, *In the Matter of the Petition of Qwest Corporation, For Investigation Concerning the Status of Competition and Impact of the FCC's Triennial Review Remand Order on the Competitive Telecommunications Environment in Washington State*, Order 05 entered March 21, 2008.

<sup>10</sup> The CLECs that are signatories to the Settlement are Covad Communications Company (Covad), McLeodUSA Telecommunications Services, Inc. (McLeod), Integra Telecom of Washington, Inc. (Integra), XO Communications Services, Inc. (XO Communications), and Eschelon Telecom, Inc (Eschelon). These CLECs are collectively referred to as the Joint Competitive Local Exchange Carriers or Joint CLECs.

<sup>11</sup> Order 06 entered March 21, 2008, in this proceeding summarized the procedural history and it will not be repeated here.

- 8 By Order 05, entered March 21, 2008, the Commission accepted, subject to conditions, the multi-party settlement filed in Docket UT-073035. No party filed a petition for review and that order became final, by operation of law, on April 11, 2008. On April 17, 2008, the Commission entered a Notice of Finality.
- 9 Having resolved the outstanding issues in Docket UT-073035, it was appropriate to schedule further proceedings in this docket. Therefore, on March 21, 2008, the Commission also entered Order 06 in this proceeding scheduling a prehearing conference, granting the motion for a standing protective order, vacating the prior protective order, and establishing a new deadline for filing petitions to intervene in this proceeding.
- 10 The Commission received a petition to intervene from CBeyond Communications, LLC (CBeyond). That petition was denied by Order 08 entered in this proceeding on April 16, 2008, because CBeyond does not have customers in Washington. The prehearing conference convened, as scheduled, on April 17, 2008, at Olympia, Washington, before Administrative Law Judge Patricia Clark.
- 11 On April 18, 2008, the Commission entered Order 09 establishing May 21, 2008, as the deadline for parties to file objections to Qwest's petition. No party filed objections.
- 12 **PETITION.** Qwest requests approval of its 2007 additions to its non-impaired wire center list<sup>12</sup> based on the methodology set forth in a Joint Settlement Agreement between Qwest and the Joint CLECs.<sup>13</sup> According to the Settlement, Qwest may request the addition of non-impaired wire centers based in whole or in part upon line counts at any time up to July 1 of each year, based on prior year line count data, and using an agreed-upon methodology.

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<sup>12</sup> The original non-impaired wire center list is set forth in Docket UT-053025, Order 06, Appendix 1, Table 1.

<sup>13</sup> The Joint Settlement Agreement was filed in Docket UT-053025 concurrently with this petition. It was later withdrawn and refiled in Docket UT-073035 and ultimately approved by Order 05 entered in the latter proceeding.

- 13 The Settlement identifies the wire centers that are included in the initial Commission-approved wire center list.<sup>14</sup> According to the Settlement, the Joint CLECs agree to not order non-impaired facilities identified on the Commission-approved list.
- 14 The Settlement further establishes the non-recurring charge for conversions using the initial wire center list and for future Commission-approved additions to that list. For at least three years from the effective date of the Settlement, Qwest will assess an effective net non-recurring charge of \$25 for each facility converted from an unbundled network element (UNE) to an alternative service or product. Qwest may assess a non-recurring conversion charge in excess of \$25 so long as Qwest provides a clearly identified lump sum credit within three billing cycles resulting in an effective net non-recurring charge of \$25.
- 15 The Settlement also determines the methodology for counting business lines and determining collocation. The methodology to calculate business line counts<sup>15</sup> and age of data<sup>16</sup> is as follows:
- 16 *Business Line Counts.*<sup>17</sup> Qwest retail business lines shall be determined using the most recently filed unadjusted Automated Reporting Management Information System (ARMIS) data reported to the FCC. For purposes of future non-impairment designations, Qwest shall follow FCC ARMIS instructions and will record and count retail business lines in precisely the same manner as business access line data is tracked and recorded in the Wire Center level data Qwest uses to develop its statewide ARMIS 43-08 reports filed annually with the FCC, without making any inter-wire center adjustments to this data and without including the same lines in more than one of the categories listed as Unbundled Network Element (UNE) loops, Business UNE-P, and Platform Offerings.

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<sup>14</sup> In Washington, those wire centers include Bellevue Glencourt, Bellview Sherwood, Kent O'Brian, Olympia Whitehall, Seattle Atwater, Seattle Campus, Seattle Cherry, Seattle Dumwamish, Seattle East, Seattle Elliott, Seattle Main, Spokane Riverside, and Tacoma Fawcett.

<sup>15</sup> The methodology approved by Order 05 in Docket UT-073035 would also govern the designation of wire centers as non-impaired based on the number of fiber-based collocators. Qwest may request the addition of non-impaired wire centers based on the number of fiber-based collocators at any time.

<sup>16</sup> Docket UT-073035, Order 05, Appendix A, pp. 16 – 20.

<sup>17</sup> Docket UT-073035, Order 05, Appendix A, Section V(A)(1) at 6.

- 17 *UNE Loops.*<sup>18</sup> UNE loops connected to a Wire Center where DS1 and DS3 unbundled loops and DS1 and DS3 Enhanced Extended Loops (“EELs”) are provided to CLECs shall be counted at full capacity (*i.e.*, DS1s will be counted as 24 business lines and DS3s will be counted as 672 business lines).
- 18 *Business UNE-P Lines*<sup>19</sup> Only Business UNE-P lines will be counted for the Commission-approved wire center list. Business UNE-P lines shall be derived by subtracting the count of listings associated with residential UNE-P from the total number of UNE-P lines.
- 19 *Platform Offerings.*<sup>20</sup> Qwest Platform Plus (QPP), Qwest Local Services Platform (QLSP), and other similar platform product offerings shall be calculated using actual business line counts for these services.
- 20 The Settlement also governs future Qwest filings to request Commission approval of non-impairment designations, additions to the Commission-approved wire center list, and the timing for objections to those requests. The Settlement governs the amount of time CLECs have to transition from the non-impaired facilities to an alternative service. During the transition periods, service will be provided at a rate equal to 115 percent of the UNE rates applicable on the effective date. Qwest commits to make the terms and conditions of the Settlement available to other requesting CLECs for inclusion in their Interconnection Agreements.
- 21 In its petition, Qwest seeks to add wire centers to its non-impaired wire center list using the methodology set forth in the Settlement and approved by the Commission. The wire centers that are the subject of the petition are as follows:

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<sup>18</sup> *Id.* at Section V(A)(2).

<sup>19</sup> *Id.* at Section V(A)(3).

<sup>20</sup> Docket UT-073035, Order 05, Appendix A, Section V(A)(4) at 7. Platform offerings are a combination of local loops, switching, and transport offered by an ILEC.

TABLE 1

STATE	WIRE CENTER	CLLI	TIER
WA	Bellevue Glencourt	BLLVWAGL	Tier 1
	Orchards	ORCHWA01	Tier 2
	Spokane Walnut	SPKNWAWA	Tier 2

22 On June 29, 2007, Qwest filed, subject to a protective order, highly-confidential CLEC-specific data in support for its petition to designate Bellevue Glencourt, Orchards, and Spokane Walnut wire centers as non-impaired and to specify their Tier level. That support included several highly-confidential attachments including: (1) December 2006 business line counts; (2) Unbundled Network Element-Loop (UNE-L) and Enhanced Extended Loop (EEL) data by type of circuit (voice grade, DS1, DS3); (3) UNE-L and EEL data by type of circuit and by CLEC; and (4) Qwest Platform Plus (QPP) data by CLEC.<sup>21</sup> Data were provided for each wire center for which Qwest sought classification as a non-impaired wire center based on the number of business lines.

23 Qwest asserts that the three wire centers designated in Table 1 should be classified as non-impaired because the business line data complies with the requirements of the TRRO and follows the methodology approved by adoption of the Settlement in Docket UT-073035.<sup>22</sup>

24 Qwest further asserts that it has provided data for each of the foregoing categories of lines in a form that meets the requirements of the Commission-approved Settlement. Specifically, the December 2006 TRRO business line counts, by line type, for additional wire centers classified as non-impaired are the latest available ARMIS 43-08 line counts used to create official ARMIS data on file with the FCC. The UNE-L and EEL data, by type of circuit (voice grade, DS1, DS3) and by CLEC for each additional wire center classified as non-impaired, includes the total wholesale UNE

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<sup>21</sup> These highly-confidential documents were appended to the filing as Attachments A –D.

<sup>22</sup> Order 05 entered March 21, 2008.

loops at the aggregated level for the wire centers at issue and by capacity. The information is also provided on a disaggregated basis for all CLECs with the names of the CLECs “masked” to ensure anonymity. Qwest will provide a CLEC with the masking code information necessary for the CLEC to identify its own line count data and Qwest calculations to derive 64-kbps equivalents for high capacity loops. The QPP business line data, by CLEC, for each additional wire center classified as non-impaired based on the number of business lines is provided on a disaggregated basis for all CLECs with CLEC names “masked” to ensure anonymity and Qwest will provide each CLEC with the information necessary for the CLEC to identify its own line count data.

25 **DISCUSSION AND DECISION.** The Commission has reviewed Qwest’s petition for approval of 2007 additions to the non-impaired wire center list based on the methodology approved in Order 05 in Docket UT-073035, and determined that the petition should be granted.

26 Qwest provided a general notice to all CLECs indicating which wire centers it intended to include in its filing with the Commission.<sup>23</sup> The Joint CLECs participated in this proceeding and had the opportunity to file objections to the proposed additions to the non-impaired wire center list. The Joint CLECs did not file objections to Qwest’s petition. All CLECs who would be affected by reclassifying the wire centers as non-impaired were given notice and the opportunity to object to the classifications.<sup>24</sup> No objections were filed.<sup>25</sup> Accordingly, the petition is unopposed.

27 The revised methodology for designating wire centers as non-impaired, adopted by the Commission in Docket UT-073035, allows Qwest to request that additional wire centers be designated as non-impaired by July 1 of each year based on prior year line count data. Qwest filed its petition on June 22, 2007, and filed supporting data on June 29, 2007. The petition with supporting data was timely filed by July 1.

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<sup>23</sup> A copy of the notice was attached as Appendix 2 to Qwest’s June, 29, 2007, filing in support of its petition.

<sup>24</sup> Order 06 entered March 21, 2008.

<sup>25</sup> Eschelon initially objected to Qwest’s petition on the basis that the Settlement had not been approved and that it was to be afforded additional time to file substantive objections to the classifications once the Settlement was approved. Eschelon did not file substantive objections when afforded the opportunity to do so.



- 28 The petition requests that additional wire centers be designated as non-impaired based on prior year line count data. The FCC chose business line counts as one of the wire center criteria because they “are an objective set of data that incumbent LECs already have created for other regulatory purposes,” specifically identifying ARMIS 43-08 data.<sup>26</sup> The FCC did not require the use of data from any particular year. The Commission approved the use of prior year line count data to designate wire centers as non-impaired. Qwest’s filing includes the appropriate year’s data.
- 29 The Commission has reviewed the highly-confidential data contained in Attachments A – D of Qwest’s June 29, 2007, filing and concludes that the data complies with the requirements of the TRRO and follows the methodology in the approved Settlement for designating a wire center as non-impaired.<sup>27</sup> Highly-confidential Attachment A includes 2006 TRRO business line counts, by line type, for each additional wire center to be classified as non-impaired based on the number of business lines. Highly-confidential Attachment B includes UNE-L and EEL data by type of circuit for each additional wire center to be classified as non-impaired based on the number of business lines. Highly Confidential Attachment C includes the UNE-L and EEL data by type of circuit and by CLEC for each additional wire center to be classified as non-impaired based on the number of business lines. Finally, highly-confidential Attachment D includes the QPP business line data, by CLEC, for each additional wire center to be classified as non-impaired based on number of business lines. Moreover, Qwest used the most recently filed unadjusted ARMIS data filed with the FCC for its business line counts. A review of this recent and objective data demonstrates that Qwest has appropriately classified wire centers in Washington as either Tier 1 or Tier 2. Qwest designated the Bellevue Glencourt wire center as Tier 1 for DS1 and DS3 Transport and Dark Fiber (DF). Qwest assigned Orchards as Tier 2 for DS3 Transport and DF and Spokane Walnut as Tier 2 for DS3 Transport and DF. Each highly-confidential wire center line count meets the threshold line count established by the FCC in its TRRO. Qwest assigned the appropriate Tier level to each wire center based on the line counts.

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<sup>26</sup> TRRO ¶ 111.

<sup>27</sup> Docket UT-073035, Order 05, entered March 21, 2008.

30 The additional wire centers designated as non-impaired are listed on Appendix A  
attached to this Order and, by this reference, incorporated herein. The initial wire  
center list is updated to include the additional three wire centers and a complete list of  
Qwest's non-impaired wire centers in Washington is attached to this Order as  
Appendix B and, by this reference, incorporated herein.

### **FINDINGS OF FACT**

31 Having discussed above in detail the evidence received in this proceeding concerning  
all material matters, and having stated findings of fact and conclusions upon issues  
and the reasons therefore, the Commission now makes and enters the following  
summary of those facts, incorporating by reference pertinent portions of the preceding  
detailed findings:

32 (1) The Washington Utilities and Transportation Commission is an agency of the  
State of Washington, vested by statute with authority to regulate rates, rules,  
regulations, practices, and accounts of public service companies, including  
telecommunications companies.

33 (2) Qwest is engaged in Washington State in the business of supplying  
telecommunications service for hire, sale, or resale to the general public for  
compensation.

34 (3) On June 22, 2007, Qwest filed a petition to designate three additional wire  
centers in Washington as non-impaired; Bellevue Glencourt as Tier 1,  
Orchards as Tier 2, and Spokane Walnut as Tier 2.

35 (4) On June 29, 2007, Qwest filed highly-confidential data in support of its  
petition to designate additional wire centers in Washington as non-impaired.

36 (5) No party objected to Qwest's petition.

37 (6) Qwest's petition to designate additional wire centers as non-impaired was  
timely filed in accordance with the deadline established by acceptance of the  
Settlement in Docket UT-073035.

- 38 (7) Qwest's petition includes the appropriate year's data to designate additional wire centers as non-impaired.
- 39 (8) The highly-confidential data filed in support of the petition complies with the guidelines established by the FCC's TRRO and the methodology approved by acceptance of the Settlement in Docket UT-073035.

### CONCLUSIONS OF LAW

40 Having discussed above all matters material to this decision, and having stated detailed findings, conclusions, and the reasons therefore, the Commission now makes the following summary conclusions of law, incorporating by reference pertinent portions of the preceding detailed conclusions:

- 41 (1) The Washington Utilities and Transportation Commission has jurisdiction over the subject matter of, and parties to, this proceeding. *Title 80, RCW.*
- 42 (2) Qwest is a "public service company" and a "telecommunications company", as those terms are defined in RCW 80.04.010 and as those terms otherwise are used in Title 80 RCW.
- 43 (3) The FCC's Triennial Review Remand Order finds competitive local exchange carriers are not impaired under Section 251 of the Telecommunications Act of 1996 without access to high capacity loops and transport if the wire centers serving the loops and transport meet certain criteria.
- 44 (4) The FCC established, in the Triennial Review Remand Order, the number of business lines serving a wire center as one criterion for determining whether a wire center is non-impaired for purposes of Competitive Local Exchange Carrier access to high capacity loops and transport.
- 45 (5) Qwest's petition to designate the Bellevue Glencourt wire center as Tier 1, the Orchards wire center as Tier 2, and the Spokane Walnut wire center as

Tier 2 non-impaired wire centers in Washington meets the standard in the Triennial Review Remand Order and Commission-approved methodology and should be granted.

- 46 (6) The Commission should retain jurisdiction over the subject matter and the parties to this proceeding to effectuate the terms of this Order. *Title 80 RCW.*

**ORDER**

THE COMMISSION ORDERS THAT:

- 47 (1) Qwest Corporation's petition to designate the Bellevue Glencourt wire center as Tier 1, the Orchards wire center as Tier 2, and the Spokane Walnut wire center as Tier 2 non-impaired wire centers in Washington is granted, as set forth in Appendix A to this Order.
- 48 (2) The Commission retains jurisdiction to effectuate the terms of this Order.

Dated at Olympia, Washington, and effective July 30, 2008.

WASHINGTON STATE UTILITIES AND TRANSPORTATION COMMISSION

PATRICIA CLARK  
Administrative Law Judge

## NOTICE TO THE PARTIES

This is an Initial Order. The action proposed in this Initial Order is not yet effective. If you disagree with this Initial Order and want the Commission to consider your comments, you must take specific action within the time limits outlined below. If you agree with this Initial Order, and you would like the order to become final before the time limits expire, you may send a letter to the Commission, waiving your right to petition for administrative review.

WAC 480-07-825(2) provides that any party to this proceeding has twenty (20) days after the entry of this Initial Order to file a *Petition for Administrative Review*. What must be included in any Petition and other requirements for a Petition are stated in WAC 480-07-825(3). WAC 480-07-825(4) states that any party may file an *Answer* to a Petition for review within (10) days after service of the Petition.

WAC 480-07-830 provides that before entry of a Final Order any party may file a Petition to Reopen a contested proceeding to permit receipt of evidence essential to a decision, but unavailable and not reasonably discoverable at the time of hearing, or for other good and sufficient cause. No Answer to a Petition to Reopen will be accepted for filing absent express notice by the Commission calling for such answer.

RCW 80.01.060(3), as amended in the 2006 legislative session, provides that an Initial Order will become final without further Commission action if no party seeks administrative review of the Initial Order and if the Commission does not exercise administrative review on its own motion. You will be notified if this order becomes final.

One copy of any Petition or Answer filed must be served on each party of record with proof of service as required by WAC 480-07-150(8) and (9). An original and nine copies of any Petition or Answer must be filed by mail delivery to:

Attn: David W. Danner, Executive Director and Secretary  
Washington Utilities and Transportation Commission  
P.O. Box 47250  
Olympia, Washington 98504-7250

**APPENDIX A**

<b>STATE</b>	<b>WIRE CENTER</b>	<b>CLI18</b>	<b>TIER</b>	<b>NO IMPAIRMENT FOR</b>
WA	Bellevue Glencourt	BLLVWAGL	Tier 1	DS1 and DS3 Transport; DF
	Orchards	ORCHWA01	Tier 2	DS3 Transport & DF
	Spokane Walnut	SPKNWAWA	Tier 2	DS3 Transport & DF

**APPENDIX B**

<b>STATE</b>	<b>LOCATION</b>	<b>CLLI CODE</b>	<b>TIER DESIGNATION</b>
WA	Bellevue Glencourt	BLLVWAGL	Tier 1, DS1 and DS3 Transport; DF
WA	Bellevue Sherwood	BLLVWASH	Tier 1, Transport
WA	Kent O'Brien	KENTWAOB	Tier 1, Transport
WA	Olympia Whitehall	OLYMWA02	Tier 1, Transport
WA	Orchards	ORCHWA01	Tier 2, DS3 Transport & DF
WA	Tacoma Fawcett	TACMWafa	Tier 2, Transport
WA	Seattle Atwater	STTLWA05	Tier 1, Transport
WA	Seattle Cherry	STTLWACH	Tier 2, Transport
WA	Seattle Campus	STTLWACA	Tier 1, Transport
WA	Seattle Duwamish	STTLWADU	Tier 2, Transport
WA	Seattle East	STTLWA03	Tier 1, Transport
WA	Seattle Elliott	STTLWAEL	Tier 1, Transport
WA	Seattle Main/Mutual	STTLWA06	DS1 Loops, Tier 1, Transport
WA	Spokane Riverside	SPKNWA01	Tier 1, Transport
WA	Spokane Walnut	SPKNWAWA	Tier 2, DS3 Transport & DF

APPENDIX C

GLOSSARY

TERM	DESCRIPTION
<b>ARMIS</b>	Automated Reporting Management Information System. The FCC's database of telecommunication carriers' network, financial and service quality data. Carriers update the information annually on April 1.
<b>Business line</b>	A loop or line used for business purposes, <i>i.e.</i> , not a residential line.
<b>Central Office</b>	A building where the local loops are connected to switches to allow connection to other customers; also referred to as a wire center where there are several switches functioning as a switch exchange. ( <i>Newton's Telecom Dictionary, at page 157.</i> )
<b>CLEC</b>	Competitive local exchange company. A company competing with an incumbent local exchange company (ILEC) for local service customers; generally subject to limited regulation.
<b>Collocation/ Collocator</b>	<b>Collocation</b> occurs when a competing local carrier locates its switches within another local exchange carrier's central office. A <b>collocator</b> is a carrier that collocates its switches in another carrier's central office. ( <i>Newton's Telecom Dictionary, at page 182.</i> )
<b>DS0 /Voicegrade</b>	The digital representation of the capacity of an analog voice channel, <i>i.e.</i> , the traditional copper pair loop, transmitting information at 64 kilobytes per second (kbps). ( <i>TRO, n. 634</i> )
<b>DS1</b>	The initial level of multiplexing in the time division hierarchy of the telephone network; a 1.544 megabytes per second (Mbps) signal that provides the equivalent of <b>24 64 kbps DSO channels</b> . The same as a T1 facility. ( <i>TRO, n. 634</i> )
<b>DS3</b>	A digital local loop having a total digital signal speed of 44.736 Mbps provided over various transmission media, including, but not limited to fiber optics, coaxial cable, or radio. DS3 loops can be channelized into <b>28 DS1 channels</b> , or unchannelized to provide a continuous bit stream for data. ( <i>TRO, n. 634</i> )
<b>High-capacity</b>	High-capacity refers to the ability of the facility to handle a large amount of traffic or information at a single time, e.g., DS1, DS3, OCn capacity.



TERM	DESCRIPTION
<b>ILEC</b>	Incumbent local exchange company. A local exchange company in operation at the time the Act was enacted (August 1996).
<b>Interconnection</b>	Connection between facilities or equipment of a telecommunications carrier with a local exchange carrier's network under Section 251(c)(2).
<b>Interconnection Agreement</b>	An agreement between an ILEC and requesting telecommunications carrier (which may be a CLEC) addressing terms, conditions and prices for interconnection, services or network elements pursuant to Section 251.
<b>Local exchange</b>	A geographic area consisting of one or more central offices. ( <i>Newton's Telecom Dictionary, at page 301.</i> )
<b>Loop</b>	The local loop. The copper wire, fiber, or cable serving a particular customer, generally running from a central office to a residence or building.
<b>Network element</b>	A facility or equipment used in providing telecommunications services.
<b>Non-impaired</b>	A term relating to whether a competing carrier has access to unbundled network elements. Under Section 251(d)(2), an ILEC must provide unbundled access to an element if failure to provide the element would impair the carrier's ability to provide service. Under the TRRO, the FCC determined that competing carriers are not impaired under Section 251(d)(2) without unbundled access to high-capacity elements at a wire center if the wire center meets certain criteria. If a wire center meets the criteria, it is designated <b>non-impaired</b> , meaning competitors are not allowed unbundled access to high-capacity loops and transport in the wire center.
<b>Residential line</b>	A loop or line connecting a residence; used generally for residential, rather than business, purposes.
<b>Section 251(c)(3)</b>	The section of the Act that requires ILECs to provide competing carriers with access to network elements on an unbundled or individual basis. The unbundled elements provided under this section are known as UNEs.

TERM	DESCRIPTION
<b>TELRIC</b>	Total Element Long Run Incremental Cost. A method of determining the cost, and prices for network elements using a forward-looking process, rather than the existing network of a carrier. Generally, the pricing methodology for UNEs.
<b>TRO</b>	The FCC’s Triennial Review Order. August 2003 order addressing UNEs and the impairment standard for UNEs, vacated in part and remanded in part by the D.C. Circuit Court of Appeals in <i>USTA II v. FCC</i> .
<b>TRRO</b>	The FCC’s Triennial Review Remand Order. March 2005 order entered in response to D.C. Circuit’s <i>USTA II</i> decision: Eliminates local switching as a UNE as of March 11, 2006, and limits unbundling of high-capacity transport and loops.
<b>Transport</b>	Lines or connections used to transmit voice or data through a carrier’s network. Transport media include copper wire, fiber optics, microwave, or satellite. ( <i>From Newton’s Telecom Dictionary, at page 815.</i> ) See dedicated transport.
<b>Trunk, Also trunked transport</b>	A communication line between two switching systems. A single trunk, capable of carrying a single conversation, is referred to DS0.
<b>Unbundled</b>	A network element that is provided by itself, not in connection with or “bundled” with another network element. A means for a carrier to request particular services from an ILEC to customize the service the carrier provides, without having to accept a package of elements and services that the carrier must take as an all or nothing option.
<b>UNE</b>	Unbundled network element. Generally a network element an ILEC must make available under Section 251(c)(3) of the Act.
<b>UNE-P, also UNE-P line</b>	Unbundled Network Element Platform, or a combination of local loops, switching and transport offered by the ILEC.
<b>UNE-loop, or UNE-L</b>	Unbundled network element loop, or a stand-alone loop provided without the combination of switching and transport provided via UNE-P.
<b>Wire center</b>	The location where a telephone company terminates and switches local lines, or loops. A wire center may have one or more class 5 central offices or exchanges. ( <i>From Newton’s Telecom Dictionary, at page 884.</i> )