

**BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of the Investigation )  
Concerning the Status of Competition ) DOCKET NO. UT-053025  
and Impact of the FCC’s Triennial )  
Review Remand Order on the ) QWEST’S ANSWER TO JOINT  
Competitive Telecommunications ) CLEC OBJECTIONS TO QWEST  
Environment in Washington State. ) RESPONSE TO ORDER 04  
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**I. INTRODUCTION**

1 Qwest Corporation (“Qwest”) hereby responds to the Joint CLEC Objections to Qwest’s Response to Order 04 in this docket. Joint CLECs have objected to Qwest’s provision of 2005 ARMIS data, as well as Qwest’s provision of updated information regarding fiber-based collocators. This information was provided by Qwest on October 18, 2006, in accordance with paragraph 63 of Order 04. The Joint CLECs ask the Commission to “require Qwest to fully comply with Order 04 – specifically (1) to provide ARMIS 43-08 data without modification, and (2) to provide additional information supporting the disputed fiber-based collocator in the Olympia Whitehall wire center – or the Commission should find that Qwest has failed to carry its burden of proof and adopt the Joint CLECs’ position on the wire center designations.” *Objections* ¶ 1.

## II. DISCUSSION

- 2 Qwest answers these allegations and denies that it has failed to comply with Order 04. Qwest's provision of the 2005 ARMIS data was consistent with how it had previously submitted the 2003 ARMIS data and was further consistent with the Commission's requirements. With regard to the issue of fiber based collocators, Qwest has contacted Joint CLECs and is discussing with them the provision of information that will address their issues in the Olympia Whitehall central office.
- 3 The Joint CLECs complain, in paragraphs 2-4 of the Objections, that Qwest did not comply with Order 04 with respect to business access lines, both with regard to the wire centers data that was provided, and with regard to how the line counts were provided. With regard to the provision of data for only three wire centers, as opposed to all of the wire centers at issue in this docket, Qwest responds that Order 04 is limited to three wire centers with respect to the ARMIS data (Seattle Cherry, Kent O'Brien and Olympia Whitehall). Qwest provided that data. Qwest understands that the Joint CLECs want updated data for all wire centers – however, that issue is currently pending in the Joint CLECs' Petition for Reconsideration, and no decision has been reached by the Commission on that question.
- 4 Joint CLECs' main issue appears to be the request that the Commission require Qwest to file "unadjusted" ARMIS data for each wire center Qwest has designated. However, this is well beyond the scope of what Order 04 requires. Joint CLECs complain that Qwest adjusted its ARMIS business line counts to account for dedicated circuits that originate in one wire center but provide service to a customer in a different wire center. Joint CLECs note, and apparently understand, that Qwest has developed statewide average ratios of the number of such circuits to the total number of circuits and that Qwest then applied that ratio to the ARMIS 43-08 line counts for each wire center. *Objections* ¶ 3. The Joint

CLECs are correct that this is what Qwest did. This was necessary because ARMIS 43-08 data as filed with the FCC is not wire-center specific, and some methodology must be employed to properly attribute line counts to their “home” wire centers.

5 Notwithstanding this evident understanding of what Qwest did, the Joint CLECs claim that Qwest “provided no information on how it calculated those lines.” *Objections* ¶ 2. This is simply incorrect. The data Qwest provided on October 18, 2006 with respect to DS0 channel counts associated with DS1-based services in response to Order 04 was in exactly the same format as Qwest provided in response to Order 03 in April 2006. The Joint CLECs did not object to this aspect of the data that was provided in response to Order 03, more than six months ago.

6 Qwest explicitly showed the statewide utilization factor in Confidential Attachment A of its response to Order 04 (exactly as it did in its response to Order 03) for each service requiring a calculation (such as ISDN-PRI and DSS). The DS0 business line quantities shown for these services are based directly on these ratios. To determine the underlying quantity of DS1s (there were no services in these three wire centers that had DS3 facilities), one simply needs to divide the "business line" totals for the service category (such as ISDN-PRI) by the utilization factor. This is all completely evident from the 2003 and 2005 data filings, and the Joint CLECs state no basis upon which to conclude that Qwest did not comply with Order 04. Thus, in response to paragraph 4 of the *Objections*, Qwest disagrees with the Joint CLECs’ allegations that Qwest has not provided the statewide average ratios used to calculate the DS0 lines associated with DS1-based services. The ratios are shown plainly in each relevant service category on Confidential Attachment A in Qwest’s response to Order 04, and have been fully explained.

7 With respect to the allegations in paragraphs 5 -7 of the Objections, Qwest is currently working on gathering data to address the Joint CLECs' concerns on this issue, and is hopeful that this particular issue can be resolved among the parties.

DATED this 1st day of November, 2006.

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