

**BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION
COMMISSION**

IN THE MATTER OF QWEST CORPORATION d/b/a CENTURYLINK QC'S PETITION FOR COMMISSION APPROVAL OF 2013 ADDITIONS TO ITS NON- IMPAIRED WIRE CENTER LIST	Docket No. [New] QWEST CORPORATION d/b/a CENTURYLINK QC'S PETITION FOR COMMISSION APPROVAL OF 2013 ADDITIONS TO ITS NON- IMPAIRED WIRE CENTER LIST AND MOTION FOR EXPEDITED ISSUANCE OF PROTECTIVE ORDER
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DECLARATION OF RENÉE ALBERSHEIM

I, RENÉE ALBERSHEIM, declare as follows:

- 1 My name is Renée Albersheim. I am employed by CenturyLink as a Lead Witnessing Representative for the Wholesale Organization. My business address is 930 15th Street, 6th Floor, Denver, Colorado 80202.

- 2 Subsequent to and in adherence to the terms of the "Multi-State Settlement Agreement Regarding Wire Center Designations and Related Issues" which was filed with this Commission on Friday, June 22, 2007 (hereafter referred to as "Settlement Agreement"), CenturyLink filed a list of additional Non-Impaired Wire Centers on December 11, 2013 with the Washington Utilities and Transportation Commission ("Commission"). The Settlement Agreement was

adopted with conditions by the Washington Commission in Docket No. UT-073035, on March 21, 2008, Order No. 05 (“TRRO Settlement Order”).

- 3 In support of the filing, I supervised an inventory of Fiber-Based Collocators in CenturyLink Wire Centers to ascertain the number of fiber-based collocators in each wire center and the appropriate “Tier” designation. The Tier was subsequently used to establish Non-Impairment. Highly-Confidential Attachment A to this affidavit, “Collocations by Wire Center,” details the Tier designation by wire center and details the number and identity of the fiber-based collocators in each wire center.
- 4 As part of that inventory, and as required under the terms of the Settlement Agreement, I oversaw a physical field verification of the inventoried fiber-based collocators, and cross-referenced the physical inventory data with the corresponding order and construction records and billing data. The results of that physical field verification (The Collocation Verification Worksheets) are contained in Highly Confidential Attachment B to this affidavit.
- 5 Additionally, I supervised research of the billing records for the collocation space and the active power supply to each collocation to ensure that each collocation was indeed an active fiber-based collocation and that the operators of these fiber-based collocations met the FCC’s definition of a Fiber-Based Collocator.
- 6 CenturyLink sent each of the identified Fiber-Based Collocators a letter requesting further validation of their status as a Fiber-Based Collocator. Based on their responses, and if necessary, I oversaw the reconciliation of any

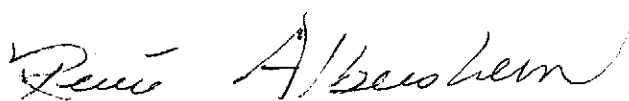
discrepancies as to the physical aspects of the collocation (as noted on the physical verification worksheets) or in information with respect to changes in ownership, mergers and/or acquisitions (See Highly-Confidential Attachment C for a copy of the letters, and Highly Confidential Attachment D for copies of the correspondence between CenturyLink and responding CLECs).

7 CenturyLink undertook a thorough analysis to ensure that the number of Fiber-Based Collocators in CenturyLink Wire Centers was accurately counted. Its process for identifying fiber-based collocators meeting the FCC's definition produced an accurate and verified count. The resulting determination of a change in the non-impairment status of Washington Wire Centers, having relied on this accurate and verified data, is by extension just as accurate and should be validated by this Commission.

8 This accurate and verified data on the number of Fiber-Based Collocators was the sole determining factor in establishing which additional Washington wire centers were Non-Impaired. The numbers of Business Lines in each Wire Center had no impact on the non-impairment status of any Washington wire centers at this time and were not considered for this filing.

I declare under penalty of perjury under the laws of the state of Washington that the foregoing is true and correct.

Signed at Denver, Colorado on December 11, 2013.
[City] [State]



RENÉE ALBERSHEIM

REDACTED

Highly Confidential Attachment A
Washington Collocators by Wire Center

State	Wire Center	Co Name	Colloc Name	Tier
Washington	YAKMWA02HG4	Yakima Chestnut	REDACTED	
Washington	YAKMWA02HG7	Yakima Chestnut		
Washington	YAKMWA02HGA	Yakima Chestnut		
		Yakima Chestnut		Tier 2



Validated by:
FC Millstead

Date:

30-May-13



930 15th Street, 6th Floor
Denver, CO 80202

June 19, 2013

Announcement Date:	June 19, 2013
Effective Date:	NA
Document Number:	CLEC_Legal_Ownership
Notification Category:	Network Notification
Target Audience:	[REDACTED]
Subject:	CLEC Legal Ownership Information and Fiber-based Collocation Validation - Action Requested

CenturyLink will be filing with state regulatory commissions requesting that certain wire centers located in those states be deemed non-impaired. This filing is being made because the wire centers meet the threshold criteria for non-impairment outlined in the Federal Communication Commission's ("FCC") Triennial Review Remand Order, FCC-04-290 ("TRRO").

One component of the FCC's non-impairment thresholds is the presence of fiber-based collocators in a wire center. Rule 51.5 of the FCC rules requires that to be deemed a fiber-based collocator, the following criteria must be met:

A fiber-based collocator is defined as any carrier, unaffiliated with the incumbent LEC (CenturyLink), that maintains a collocation arrangement in an incumbent LEC (CenturyLink) Wire Center, with active electrical power supply, and operates a fiber-optic cable or comparable transmission facility that:

- a. terminates at a collocation arrangement within the Wire Center;
- b. leaves the incumbent LEC's (CenturyLink's) Wire Center premises; and
- c. is owned by a party other than the incumbent LEC (CenturyLink) or any affiliate of the incumbent LEC (CenturyLink), except as set forth in this definition. Dark fiber obtained from an incumbent LEC (CenturyLink) on an indefeasible right of use basis shall be treated as non-incumbent LEC (non-CenturyLink) 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 the purposes of this definition, "affiliate" is defined by 47 U.S.C. §153(1) and any relevant interpretation in that title.

The purpose of this notice is to advise you that CenturyLink is relying on the fiber-based collocation owned and operated by your company in support of its request that certain wire centers be found to be non-impaired and, therefore, relieving CenturyLink of unbundling obligations for certain high capacity UNEs.

Attachment C - REDACTED

Provided below is your carrier-specific fiber-based collocation data on which CenturyLink is relying for its determination of wire center non-impairment. Please review this data and contact CenturyLink by no later than July 8, 2013, if you disagree with the fiber-based collocation designation and you have information to support this position or if there is some inaccuracy in the information CenturyLink has on file identifying legal ownership.

Wire Center	Site	WG Code	CG Name	Type of Collocation
[REDACTED]				

By close of business on July 8, 2013, please send to CenturyLink via certified mail a letter that includes:

- a. A verification of the ownership/relationship information described above, and;
- b. Additional information about other ownership relationships that may have an impact on CenturyLink's fiber collocation customer records for this wire center, if any, and;
- c. A confirmation that these relationships meet the requirements of the FCC's Order and;
- d. A validation of the fiber-based collocation data as described above.

Please address the letter to:

Renee Albersheim
CenturyLink
930 15th Street, 6th Floor
Denver, CO 80202

If you have any questions or would like to discuss this request, please contact Renee Albersheim via email: Renee.Albersheim@centurylink.com

Sincerely,

CenturyLink Corporation

Attachment C - REDACTED



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Denver, CO 80202

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Wire Center	State	WC CLID	CO Name	Legal Owner
REDACTED				

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FILED Name	State	WC CLI	CO Name	Type of Collocation
REDACTED				

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Sincerely,

CenturyLink Corporation

Attachment C - REDACTED

From:

[REDACTED]

[REDACTED]

[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

[REDACTED]

NOTICE - CONFIDENTIAL INFORMATION

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From: mailouts2@centurylink.com [mailto:mailouts2@centurylink.com]
Sent: Friday, June 21, 2013 9:13 AM

[REDACTED]



[REDACTED]