

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION  
COMMISSION

In the Matter of

QWEST CORPORATION

Petition for Commission Approval of  
2007 Additions to Non-Impaired Wire  
Center List

DOCKET NO. UT-073033

QWEST CORPORATION'S  
PETITION FOR COMMISSION  
APPROVAL OF 2007 ADDITIONS  
TO NON-IMPAIRED WIRE  
CENTER LIST AND MOTION FOR  
EXPEDITED ISSUANCE OF  
PROTECTIVE ORDER

AFFIDAVIT OF ROBERT BRIGHAM

STATE OF COLORADO            )  
  ) ss.  
COUNTY OF DENVER            )


I, ROBERT BRIGHAM, being first duly sworn, depose and state that:

1. My name is Robert Brigham. I am employed by Qwest Corporation as a Staff Director in the Public Policy Organization. My business address is 1801 California St., Suite 4700, Denver, Colorado 80202.
2. Subsequent to and in adherence to terms of the "Multi-State Settlement Agreement Regarding Wire Center Designations and Related Issues" which has been filed with this Commission in a separate docket (hereafter referred to as the "Settlement Agreement"), Qwest is filing a list of additional Non-Impaired Wire Centers on June 29, 2007 with various state regulatory commissions. Qwest also is filing the list of additional Non-Impaired Wire Centers with the Federal Communications Commission ("FCC").

3. In support of the filing, Qwest has prepared business line data that is in compliance with the requirements of the Triennial Review Remand Order ("TRRO"), and that follow the methodology defined in Section V(A) of the Settlement Agreement. The business access line data are attached hereto as Highly Confidential Attachments A, B, C and D to my affidavit.
4. Highly Confidential Attachment A includes the December 2006 TRRO business line counts, by line type, for each additional non-impaired wire center that is classified as non-impaired based on the number of business lines. These data are based on the TRRO business line methodology defined in Section V(A) of the Settlement Agreement. These data are provided in a form that meets the requirements defined in Section VI(E)(2)(a) of the Settlement Agreement.
5. Highly Confidential Attachment B includes UNE-L and EEL data by type of circuit (voice grade, DS1, DS3) for each additional non-impaired wire center that is classified as non-impaired based on the number of business lines. These data, along with the data in Highly Confidential Attachment C, meet the requirements defined in Section VI(E)(2)(b) of the Settlement Agreement.
6. Highly Confidential Attachment C includes the UNE-L and EEL data by type of circuit (voice grade, DS1, DS3) and by Competitive Local Exchange Carrier ("CLEC") for each additional non-impaired wire center that is classified as non-impaired based on the number of business lines. These data, along with the data in Highly Confidential Attachment B, meet the requirements defined in Section VI(E)(2)(b) of the Settlement Agreement.
7. Highly Confidential Attachment D includes the Qwest Platform Plus ("QPP") business line data, by Competitive Local Exchange Carrier (CLEC), for each additional non-impaired wire center that is classified as non-impaired based on the number of business lines. These data meet the requirements defined in Section VI(E)(2)(c) of the Settlement Agreement.

8. All of the data provided in Highly Confidential Attachments A, B, C and D are prepared, to the best of my knowledge, in a manner that complies with the requirements of the TRRO and the methodology defined in Section V(A) of the Settlement Agreement. All of the data provided in Highly Confidential Attachments A, B, C and D are also prepared in a form that meets the supporting data requirements defined in Section VI(E)(2) of the Settlement Agreement.

Further affiant sayeth not

  
\_\_\_\_\_  
ROBERT BRIGHAM

SUBSCRIBED AND SWORN to before me the 28th day of June, 2007.

  
\_\_\_\_\_  
NOTARY PUBLIC



My Commission Expires:

3/26/09