

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 FILING IN SUPPORT OF
ADDITIONS TO NON-IMPAIRED
WIRE CENTER LIST (2007)

I. INTRODUCTION

1 On Friday, June 22, 2007, Qwest Corporation (“Qwest”) petitioned the Commission in this docket to approve Qwest’s 2007 additions to its non-impaired wire center list. The Commission established the initial list of non-impaired wire centers on December 15, 2006¹ and upheld that ruling on February 9, 2007.² Qwest and a coalition of CLECs (“the Joint CLECs”) reached a joint settlement agreement that has been filed for Commission approval in a separate docket. As set forth in the settlement agreement, 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 1st

¹ Docket No. UT-053025, Order No. 6.

² Docket No. UT-053025, Order No. 7.

of each year, based on prior year line count data, and using an agreed-upon methodology.³

Through the petition filed herein on June 22, 2007, as supported by this filing, Qwest asks that the Commission designate the wire centers identified herein as non-impaired.

II. SUPPORT FOR THE NON-IMPAIRMENT DESIGNATION OF WIRE CENTERS

2 In support of Qwest's request is the affidavit and attachments of Mr. Robert Brigham. Mr. Brigham's affidavit (which is attached hereto as Attachment 1) and attachments provide (1) the December 2006 TRRO business line counts (Highly Confidential Attachment A), (2) the UNE-L and EEL data by type of circuit (voice grade, DS1, DS3) (Highly Confidential Attachment B), (3) the UNE-L and EEL data by type of circuit (voice grade, DS1, DS3) and by CLEC (Highly Confidential Attachment C), and (4) the QPP data by CLEC (Highly Confidential Attachment D). The data are provided for each additional non-impaired wire center that is classified as non-impaired based on the number of business lines.

III. HIGHLY CONFIDENTIAL TRADE SECRET DATA

3 Qwest's request requires the provision of data that include highly-confidential trade secret CLEC data. In order to protect these data from inappropriate disclosure, Qwest asked the Commission to issue a protective order that would provide for the appropriate handling of these confidential data. Because the Commission has issued the protective order in this matter,⁴ Qwest provides to the Commission the data supporting its list of additional non-impaired wire centers. Qwest will also provide the data to all CLECs that have provided Qwest with an executed copy of their agreement to abide by the protective order.

4 In addition to notice the CLECs may have received as a part of this proceeding, Qwest also

³ With respect to fiber-based collocators, Qwest may request the addition of non-impaired wire centers to the Commission-approved wire center list at any time based on the number of fiber-based collocators.

⁴ Order No. 1.

provided a general notice to all CLECs indicating which wire centers might be included in Qwest's filing. A copy of that notice is attached to this filing as Appendix 2.

5 In order to expedite provision of data to CLECs, each CLEC requesting the data should provide to Qwest a PDF copy of their signed agreement to abide by the protective order. In addition to forwarding that agreement to the undersigned, the signed agreement should be provided to Stacy Hanson at stacy.hanson@qwest.com on or after June 29, 2007, except during the week of July 2nd through July 6th. During that week, the PDF should be provided to Kathy Rowley, kathy.rowley@qwest.com. The CLEC should also specify the person's name, street address and telephone number to whom the data should be provided by overnight mail.

6 The wire centers for which Qwest seeks a non-impairment designation are as follows:

STATE	WIRE CENTER	CLLI8	TIER	NO IMPAIREMENT FOR
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

IV. CONCLUSION

7 Based on the data supplied herewith, Qwest respectfully requests the Commission to approve Qwest's 2007 additions to its non-impaired wire center list as specified herein and in Qwest's June 22, 2007 petition.

DATED this 29th day of June, 2007.

QWEST

Lisa A. Anderl, WSBA #13236
Adam L. Sherr, WSBA #25291
1600 7th Avenue, Room 3206
Seattle, WA 98191
Phone: (206) 398-2500