

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

IN THE MATTER OF QWEST
CORPORATION d/b/a CENTURYLINK
QC'S PETITION FOR COMMISSION
APPROVAL OF 2015 ADDITIONS TO
ITS NON-IMPAIRED WIRE CENTER
LIST

DOCKET NO. UT-

QWEST CORPORATION d/b/a
CENTURYLINK QC'S PETITION FOR
COMMISSION APPROVAL OF 2015
ADDITIONS TO ITS NON-IMPAIRED
WIRE CENTER LIST AND MOTION FOR
EXPEDITED ISSUANCE OF PROTECTIVE
ORDER

- 1 Qwest Corporation d/b/a CenturyLink QC ("CenturyLink") petitions the Washington Utilities and Transportation Commission ("Commission") to add several wire centers to its non-impaired wire center list in accordance with the FCC's *Triennial Review Remand Order* ("TRRO").¹ The requested wire centers are as follows: Renton, Spokane Fairfax, Spokane Hudson, Spokane Keystone, Spokane Walnut, Spokane Whitehall, Tacoma Fawcett, Yakima Chestnut.
- 2 This petition is made consistent with the Commission's July 30, 2008 Order in Docket No. UT-073033, Order 10 ("Initial TRRO Order"). The addition of these wire centers is also consistent with the joint settlement agreement between Qwest² and a coalition of CLECs ("the Joint CLECs") approved by the Commission in the March 21, 2008 Order

¹ Order on Remand, *In the Matter of Review of Unbundled Access to Network Elements, Review of Section 251 Unbundling Obligations of Incumbent Local Exchange Carriers*, CC Docket No. 01-338, WC Docket No. 04-313 (FCC rel. February 4, 2005) (hereafter "*Triennial Review Remand Order*" or "*TRRO*").

² Prior to April 2011, Qwest Corporation did business as Qwest. For references before April 2011, this petition will still say Qwest, and for references after April 2011, it will say CenturyLink.

05 in Docket No. UT-073035 (*TRRO* Settlement Order).³

3 In the initial *TRRO* non-impaired wire center proceeding, Qwest and the Joint CLECs negotiated and agreed to use a protective order to allow Qwest to file confidential wire center information regarding “business line” counts and the number of “fiber-based collocators” as defined in the FCC’s *TRRO*. Therefore, pursuant to the above-cited orders, CenturyLink requests that the Commission issue on an expedited basis a protective order based on the protective order previously entered as Order 01 Docket No. UT-132282, which was CenturyLink’s most recent *TRRO* filing.

BACKGROUND

4 The Commission opened Docket Nos. UT-073033 and UT-073035 to consider the issues around the implementation of the Section 251(d)(2) non-impairment standards set forth in the FCC’s *TRRO* for high-capacity dedicated transport and loops. The dockets also addressed other issues and disputes relating to the *TRRO*, including the process for identifying and adding future new wire centers to the non-impaired wire center list.

5 Thereafter, on March 21, 2008, after responses to Bench Requests and the filing of the settlement agreement, the Commission issued Order 05 in Docket No. UT-073035 resolving certain issues and disputes between Qwest and the Joint CLECs. The *TRRO* Settlement Order adopted the provisions of the Settlement relating to the requirements for adding wire centers to the list of non-impaired wire centers in the future, which include provisions regarding notice to CLEC, the request for a protective order, and timing.

³ The original docket to investigate Qwest’s initial non-impairment list was Docket No UT-053025, but that docket was essentially superceded by Docket No. UT-073035 and the Settlement Agreement filed in that docket.

6 The parties to the settlement agreement agreed that Qwest (now CenturyLink) may request the addition of non-impaired wire centers at any time based on the number of fiber-based collocators. Further, the settlement agreement states that CenturyLink 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 of each year, based on prior year line count data, and using an agreed-upon methodology.

7 The request to add the wire centers in this petition to the non-impaired wire center list is *based entirely on the number of fiber-based collocators.*

**THE LISTED WIRE CENTERS SHOULD BE ADDED TO THE
NON-IMPAIRED WIRE CENTER LIST**

8 CenturyLink now files this petition seeking to add the above-listed wire centers to its non-impaired wire center list. CenturyLink will provide the highly confidential information supporting the updated list to the Commission and any requesting CLEC in accordance with a protective order.

9 CenturyLink seeks the Commission's expedited issuance of a protective order to cover Confidential and Highly Confidential information as previously done in Docket No. UT-132282. Expedited issuance of the protective order will permit interested CLECs that sign the order to begin reviewing the confidential wire center data promptly after CenturyLink files the data.

10 As previously stated, the wire centers listed are the only wire centers that CenturyLink seeks to add to its list of non-impaired wire centers in 2015. Attachment 1 is the notice that was sent to all CLECs on June 14, 2015. The pertinent information is as follows:

STATE	WIRE CENTER	CLLI	TIER	NON-IMPAIRMENT FOR
WA	Renton	RNTNWA01	Tier 1	DS1, DS3 Transport & DF
	Spokane Fairfax	SPKNWAFWA	Tier 2	DS3 Transport & DF
	Spokane Hudson	SPKNWAHD	Tier 2	DS3 Transport & DF
	Spokane Keystone	SPKNWAKY	Tier 2	DS3 Transport & DF
	Spokane Walnut	SPKNWAWA	Tier 1	DS1, DS3 Transport & DF
	Spokane Whitehall	SPKNWAWH	Tier 2	DS3 Transport & DF
	Tacoma Fawcett	TACMWAFWA	Tier 1	DS1, DS3 Transport & DF
	Yakima Chestnut	YAKMWA02	Tier 1	DS1, DS3 Transport & DF

REQUEST FOR PROTECTIVE ORDER

- 11 A protective order is needed in this proceeding because the information that CenturyLink will file will include certain highly-confidential wire center data, including highly-confidential CLEC-specific data. Qwest and the Joint CLECs in Docket No. UT-073035 agreed this data should be protected by a protective order that contains protections and limited disclosures of highly-confidential information. Specifically, CenturyLink seeks this protective order because it will be filing CLEC-specific wire center data in this proceeding for the purposes of counting fiber-based collocators in the wire centers at issue.

CONCLUSION

12 CenturyLink respectfully requests the Commission approve the addition of the wire centers listed herein to its non-impaired wire center list. Further, CenturyLink requests that the Commission issue a protective order as soon as possible.

Respectfully submitted this 22nd day of June, 2015.

CENTURYLINK

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