

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 [Whitworth](#), Tacoma Fawcett, Yakima Chestnut.

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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.

- 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	SPKNWAFa	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 Whitworth	SPKNWAWH	Tier 2	DS3 Transport & DF
	Tacoma Fawcett	TACMWAFa	Tier 1	DS1, DS3 Transport & DF
	Yakima Chestnut	YAKMWA02	Tier 1	DS1, DS3 Transport & DF

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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.

ATTACHMENT 1



Announcement Date: June 12, 2015
Filing Date: June 22, 2015
Document Number:

Notification Category: Contract/Network Notice
Target Audience: CLECs operating in the state of WA
Subject: Additions to Non-Impaired Wire Center Lists REVISED

REVISED: The notice sent on June 5 inadvertently left a wire center off the list. This notice has been revised to include all wire centers. Please disregard the prior notice.

On June 22, 2015 CenturyLink will file a petition with the Washington Utilities and Transportation Commission to open a docket to consider the addition of wire centers to CenturyLink's Non-Impaired Wire Center List. CenturyLink will also request a protective order governing the confidential data supporting these additions to be issued expeditiously.

CenturyLink offers this Notice pursuant to the terms and conditions of the Multi-State Settlement Agreement Regarding Wire Center Designations and Related Issues entered into by CenturyLink Corporation and Covad Communications Company and DIECA Communications, Inc. (collectively "Covad"), Eschelon Telecom, Inc. ("Eschelon"), Integra Telecom Holdings, Inc. ("Integra"), McLeodUSA Telecommunications Services, Inc. ("McLeodUSA"), Onvoy, POPP.Com ("POPP"), US Link, Inc. d/b/a TDS Metrocom, Inc. ("TDSM"), and XO Communications Services, Inc. ("XO") on June 20, 2007.

At this time, CenturyLink anticipates requesting the addition of the following Wire Centers to its Non-Impaired Wire Center Lists as having met the Tier 1 or Tier 2 Wire Center designations as defined in §51.319(e)(3):

STATE	WIRE CENTER	CLLI8	TIER	NO IMPAIRMENT FOR
WA	Renton	RNTNWA01	Tier 1	DS1, DS3 Transport & DF
	Spokane Fairfax	SPKNWAFB	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 Whitworth	SPKNWAWH	Tier 2	DS3 Transport & DF
	Tacoma Fawcett	TACMWAFB	Tier 1	DS1, DS3 Transport & DF
	Yakima Chestnut	YAKMWA02	Tier 1	DS1, DS3 Transport & DF

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