

STATE	WIRE CENTER	CLLI	TIER	NON-IMPAIRMENT FOR
WA	Renton	RNTNWA01	Tier 1	DS1, DS3 Transport & DF
	Spokane Fairfax	SPKNWAFFA	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	TACMWAFFA	Tier 1	DS1, DS3 Transport & DF
	Yakima Chestnut	YAKMWA02	Tier 1	DS1, DS3 Transport & DF

On June 29, 2015, The Washington Utilities and Transportation Commission (Commission) issued Order 01 *Protective Order with “Highly Confidential” Provisions*. CenturyLink filed highly confidential data in support of its petition on June 30, 2015 at which time Integra initiated an audit of the highly confidential data provided by CenturyLink.

As a result of the information provided by CenturyLink and the results of Integra’s audit, Integra does not object to CenturyLink’s petition.

Discussion

A change in a wire center’s non-impairment classification, as requested by CenturyLink, permanently² affects the availability of unbundled network elements such as dark fiber transport, unbundled DS3 transport and unbundled DS1 transport. As a result, the Commission should be cautious when changing a wire center Tier designation and be certain that the facts support a change in the designation.

Dark fiber transport and DS3 transport are not available as unbundled network elements (“UNEs”) between a Tier 2 wire center (and another wire center classified as either Tier 1 or Tier 2. Unbundled DS1 transport is not available between two Tier 1 wire centers and is limited to a

² 47 C.F.R § 51.319 (3)(i) “...Once a wire center is determined to be a Tier 1 wire center, that wire center is not subject to later reclassification as a Tier 2 or Tier 3 wire center”

cap of 10 transport circuits between a Tier 2 wire center and another wire center classified as Tier 1 or Tier 2.

The classification of a Tier 1 or Tier 2 wire center can be based upon line counts or fiber-based collocations. In CenturyLink's 2015 Petition, they based the change in Tier status upon the number of fiber-based collocators in each wire center. A Tier 1 Classification requires at least four fiber-based collocators and a Tier 2 Classification requires at least three fiber-based collocators. The FCC defines a fiber-based collocator as:

A fiber-based collocator is any carrier, unaffiliated with the incumbent LEC, that maintains a collocation arrangement in an incumbent LEC wire center, with active electrical power supply, and operates a fiber optic cable or comparable transmission facility that (1) terminates at a collocation arrangement within the wire center; (2) leaves the incumbent LEC wire center premises; and (3) is owned by a party other than the incumbent LEC or any affiliate of the incumbent LEC except as set forth in this paragraph . Dark fiber obtained from an incumbent LEC on an indefeasible right of use basis shall be treated as non-incumbent LEC 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 purposes of this paragraph, the term affiliate is defined by 47 U.S.C. § 153(1) and any relevant interpretation in this Title.³

The impact and permanency of changes in wire center classifications led Integra to undertake an evaluation of the highly confidential data CenturyLink provided in this docket. Integra contacted the carriers listed as fiber-based collocators in the wire centers under review to confirm CenturyLink's declarations.

Conclusion

Integra completed its evaluation to verify CenturyLink's count of the fiber-based collocators in the wire centers listed in CenturyLink's petition. Based on this evaluation, Integra

³ 47 C.F.R. § 51.5

does not object to CenturyLink's application to classify the wire centers, as listed below, effective upon the Commission's order:

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	Yakima Chestnut	YAKMWA02	Tier 1	DS1, DS3 Transport & DF

RESPECTFULLY SUBMITTED,



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