

**BEFORE THE WASHINGTON STATE
UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of the Petition of:)	DOCKET UT-063061
)	
QWEST CORPORATION)	ORDER 19
)	
and)	
)	ORDER DENYING QWEST’S
ESCHELON TELECOM, INC.)	PETITION FOR
)	RECONSIDERATION
Pursuant to 47 U.S.C. Section 252(b))	
)	
.....)	

1 **SYNOPSIS.** *The Commission denies Qwest’s petition for reconsideration of three rulings in our Final Order, Order 18, regarding circuit identification numbers, UNE to non-UNE conversion charges, and informational requirements for bills and customer service records of commingled enhanced extended links.*

BACKGROUND

2 **NATURE OF PROCEEDING.** This proceeding involves a request by Qwest Corporation (Qwest) and Eschelon Telecom, Inc., (Eschelon) to arbitrate an interconnection agreement (ICA) under 47 U.S.C. § 252(b) of the Telecommunications Act of 1996 (the Act).¹

3 **APPEARANCES.** Lisa A. Anderl, Associate General Counsel, and Adam L. Sherr, Seattle, Washington, represent Qwest. Gregory J. Kopta, Seattle, Washington, and Karen L. Clauson, and Gregory Merz, Minneapolis, Minnesota, represent Eschelon.

4 **PROCEDURAL HISTORY.** Following an evidentiary hearing and briefing by the parties, on January 18, 2008, the Arbitrator entered Order 16, the Arbitrator’s Report and Decision, resolving all contested issues.² Eschelon and Qwest each filed a

¹ A glossary of acronyms and terms used in this Order is attached for the convenience of readers.
² The full procedural history in this matter is described more fully in Order 16 in this docket and

petition for review and a response to the opposing party's petition. On October 16, 2008, the Commission entered a Final Order, Order 18, Granting, In Part, and Denying, In Part, each petition for review.

- 5 On October 27, 2008, Qwest filed a petition for reconsideration of three issues addressed in our Final Order. The Commission issued a Notice Requesting Answer to the petition on October 28, 2008. On October 29, 2008, Qwest requested an extension of time to file an interconnection agreement (ICA). By notice entered October 30, 2008, the Commission extended the deadline to file an ICA until 30 days after entering an order on reconsideration or 30 days following expiration of the deadline to do so. On November 7, 2008, Eschelon filed an answer. By notice entered on November 13, 2008, the Commission established January 30, 2009, as the deadline for ruling on the petition for reconsideration. Both Qwest and Eschelon filed supplemental authority on December 23, 2008.

MEMORANDUM

- 6 **Petition for Reconsideration.** Qwest requests reconsideration of three rulings in the Final Order: (1) that Qwest must retain the same circuit identification number when it converts Eschelon's service from an unbundled network element (UNE) to a non-UNE service, (2) that the \$25 conversion charge negotiated and adopted in a separate proceeding involving Qwest and Eschelon permits Qwest to recover its conversion costs; and (3) that Qwest must include information in bills and customer service records that cross-reference UNE and non-UNE elements of point-to-point commingled enhanced extended links (EELs).³ Eschelon opposes reconsideration.
- 7 **Standard of Review.** We review petitions for reconsideration under WAC 480-07-850. While our rule provides that "the purpose of a petition for reconsideration is to request that the commission change the outcome with respect to one or more issues determined by the commission's final order," a party must do more than simply reargue an issue decided in a final order.⁴ We will grant petitions for reconsideration

is not repeated here.

³ Qwest Petition for Review at 1-2.

⁴ WAC 480-07-850(1).

only if the petitioner demonstrates that our order is erroneous or incomplete.⁵ A petition for reconsideration must also cite to portions of the record and laws or rules for support of the request for reconsideration, and must present sufficient argument to warrant a finding that our order is erroneous or incomplete. Should we grant reconsideration, we may modify our prior order or take other appropriate action.⁶

Issues on Reconsideration.

1. Jurisdiction.

8 For each ruling under reconsideration, Qwest alleges that the Commission exceeded the scope of its jurisdiction when serving as an arbitrator pursuant to Section 252 under the Act. Qwest asserts that federal courts have ruled unanimously that state commissions are authorized only to set terms and conditions relating directly to the obligations imposed on incumbent local exchange carriers (ILECs) and competitive local exchange carriers (CLECs) under Sections 251(b) and (c) of the Act.⁷ Qwest argues that the Commission exceeded its limited arbitration authority by: (1) requiring it to use the same circuit identification number for a circuit converted from a UNE to a non-UNE service; (2) adopting a fee for conversions from UNE to non-UNE services; and (3) establishing the content of bills and customer service records for commingled UNE and non-UNE services (commonly referred to as commingled EELs).

9 Under Section 252(b)(4)(C), state commissions are authorized to serve as arbitrators but are required to resolve open issues by imposing conditions required to implement Section 252(c). The standards for arbitration set forth in Section 252(c) require commissions to impose conditions that meet the requirements of Section 251. Thus, Qwest argues, state commissions are limited to resolving only those issues relating to the duties imposed by Section 251 and that they are neither authorized nor required to resolve issues regarding other services or the company's obligations arising under Section 271. Qwest contends that we erred by not relying on the language in Section 252 to determine the scope of our arbitration authority.

⁵ WAC 480-07-850(2).

⁶ WAC 480-07-850(6).

⁷ See, for example, *Southwestern Bell Telephone v. Missouri Public Service Commission*, 530 F.3d 676 (8th Cir. 2008).

- 10 Qwest further argues that the Federal Communications Commission's (FCC's) *Triennial Review Remand Order* (TRRO) does not give state commissions authority over non-Section 251 services.⁸ Qwest contends that we misinterpret the TRRO's directives for transitioning certain UNE's from the Section 251 obligations as allowing states to regulate the terms and conditions of non-Section 251 services. Qwest asserts that the authority of state commissions is limited to that granted by the Act, not the FCC.
- 11 Finally, Qwest contends that the Commission has no authority over these issues because at least some of the non-Section 251 services Qwest offers for UNE conversions are provided pursuant to Section 271 and the authority to regulate network elements and services under Section 271 rests solely with the FCC.
- 12 In its answer, Eschelon argues that Qwest erred in framing the threshold question of jurisdiction. Eschelon contends that the proper threshold question is whether issues relating to conversions and commingled arrangements fall within the scope of a CLEC's arbitration rights given that they emanate directly from the diminution of ILEC unbundling obligations under the Act. Eschelon argues that the Commission properly concluded that conversions and commingled arrangements clearly fall within those rights and the Commission's jurisdiction.⁹
- 13 Eschelon contends that none of the federal court decisions cited by Qwest deal with whether UNE conversions and commingled arrangements fall within the scope of a CLEC's arbitration rights. Accordingly, Eschelon argues the cases are irrelevant to the Commission's determination that these issues are within the scope of this arbitration. Eschelon further argues that the issue of state authority to enforce Section 271 obligations was not raised by either party in the three rounds of testimony or the hearing regarding these issues. Eschelon concludes that while the Commission has not asserted authority over Section 271 network elements, the Commission properly

⁸ *In the Matter of Unbundled Access to Network Elements; Review of the Section 251 Unbundling Obligation of Incumbent Local Exchange Carriers*, WC Docket No. 04-313, CC Docket No. 01-338, Order on Remand, FCC 04-290 (rel. Feb. 4, 2005) hereinafter referred to as the "*Triennial Review Remand Order*:" or "TRRO."

⁹ Order 18, ¶¶ 68-70; Docket UT-043013, Order 17, ¶¶ 150, 287, and 291.

determined that conversions and commingled EELs are within the scope of Sections 251 and 252 of the Act and the Commission clearly has authority over these sections.

14 Eschelon argues that Section 252(c) requires that state commissions, in resolving open issues, “shall ensure that such resolution and conditions meet the requirements of section 251, including the regulations prescribed by the Commission pursuant to section 251.”¹⁰ Thus, Eschelon contends, the Act mandates state commissions to ensure that their arbitration rulings comply with FCC regulations. Eschelon notes that the Final Order specifically references Sections 251 and 252 in its discussion of jurisdiction.¹¹

15 Finally, Eschelon notes that the FCC’s *Triennial Review Order* (TRO)¹² and TRRO clearly address the unbundling, interconnection, and nondiscrimination obligations of ILECs under Section 251 of the Act, including their obligations arising from the unbundling relief granted in those orders, which address both conversions and commingled EELs. Eschelon contends that while Qwest criticizes the Commission for relying on portions of the TRO and TRRO orders, Qwest refers to those same FCC orders to support its position on the scope of the Commission’s jurisdiction. Eschelon argues that the Commission’s interpretation is correct.

16 ***Commission Decision.*** Section 251 of the Act directs the FCC to determine the circumstances under which components of an ILEC’s network must be available on an unbundled basis. In the TRO and TRRO decisions, the FCC also determined the circumstances under which ILECs may be relieved of their unbundling obligations. The FCC specifically found that ILECs are not to unilaterally change interconnection agreements but are to negotiate and arbitrate new agreements in accordance with Section 252.¹³

¹⁰ Eschelon Answer at 8, quoting 47 U.S.C. § 252 (emphasis in Answer). In this citation, the reference to Commission means the FCC.

¹¹ Order 18, ¶¶ 68 – 69.

¹² Report and Order, *In the Matter of Review of the Section 251 Unbundling Obligations of Incumbent Local Exchange Carriers*, 17 FCC Rcd 16978 (2003), vacated in part, remanded in part, *U.S. Telecom Ass’n v. FCC*, 359 F.3d 554 (D.C. Cir. 2004). (hereinafter referred to as TRO).

¹³ TRO at ¶¶ 700, 701. TRRO at ¶ 233.

- 17 That is exactly the circumstance that gave rise to this proceeding. The initial ICA between Qwest and Eschelon expired July 24, 2000, but the parties continued to operate under that agreement while attempting to negotiate a new agreement. While those negotiations were underway, the FCC issued its TRO and TRRO decisions regarding ILECs' unbundling obligations. Thus, Qwest and Eschelon attempted to negotiate terms and conditions of a new ICA that complied with the FCC's intent under the TRO and TRRO orders, as well as all other provisions in the expired ICA. The parties reached agreement on many issues narrowing the scope of this arbitration from more than 250 pages of disputed issues to approximately 150 pages of disputed issues. Of the large number of issues originally teed up to be addressed in this arbitration, only three relating to conversion and commingling issues are raised in the petition for reconsideration.
- 18 These remaining issues merely address the operational processes attendant to converting existing circuits from a UNE basis to a non-UNE basis. The issues arise directly as a consequence of the unbundling relief the FCC afforded ILECs such as Qwest in the TRO and TRRO proceedings.
- 19 We reject Qwest's contention that a series of federal court decisions, including a recent decision by the United States Court of Appeals for the Eighth Circuit,¹⁴ implicate or place limits on our Section 252 authority with respect to conversions and commingling. Those decisions are not on point. The cases address efforts by other state commissions to rely upon state law or Section 271 to impose or address unbundling issues; a circumstance not present in this proceeding. Our Final Order did not attempt to establish rates or address operational conditions for Qwest's obligations under Section 271 nor to apply state law in some fashion to retain unbundling requirements where relief had been granted by the FCC. The issues under reconsideration merely addressed the operational processes attendant to converting existing circuits from a UNE basis to a non-UNE basis and fall well within our authority pursuant to Section 252 and the FCC's orders revising ILEC obligations under Section 251.

¹⁴ *Southwestern Bell Telephone v. Missouri Public Service Commission*, 530 F. 3d 676 (8th Cir. 2008).

20 As in our Final Order, we reject Qwest's contention that we exceeded our authority under Section 252 to address these issues. In that Order, we followed the FCC's specific guidance to carriers and state commissions to address, through the Section 252 process, the transition from UNE services to non-UNE services and establish any rates, terms, and conditions necessary to implement the changes prescribed by the FCC. As envisioned by the FCC, we appropriately exercised our jurisdiction to provide CLECs a reasonable transition process away from UNEs and ensure a seamless effect on services provided to their end-users.

21 We believe that Qwest continues to exaggerate the distinction between UNE and non-UNE terms and conditions. We reiterate the FCC's conclusion, and our own, that the primary difference between the two is the rate at which Qwest is entitled to bill for services; a rate which was formerly limited by TELRIC pricing. By overstating the distinction between UNE and non-UNE terms and conditions, Qwest misinterprets the basis and scope of our authority.

2. Conversions.

A. Change in Circuit ID.

22 Our Final Order concluded that we had jurisdiction to address this issue and that the conversion from UNEs to alternative products and services is largely a billing function.¹⁵ We required Qwest to retain the same circuit identification number, or ID, for conversions, finding that retaining a common circuit ID appeared to be the best method to ensure that the transition from UNE to non-UNE classification is a seamless transition for CLECs and their end-users.

23 Qwest requests that we reverse our ruling because we lack jurisdiction to impose a term or condition for a service that it does not provide under § 251.¹⁶ In addition, Qwest argues that using a single circuit ID number will adversely affect service, cause prejudice to other CLECs, and cause financial harm to Qwest.¹⁷ Qwest asserts that it explained in testimony and prior briefs that separate circuit ID numbers are required

¹⁵ Order 18, ¶¶ 67 – 70, 83 – 85.

¹⁶ For a more complete discussion of Commission jurisdiction *see* ¶¶ 16 - 20 above.

¹⁷ Qwest Petition for Reconsideration at 11.

for UNE and non-UNE products because they are subject to separate regulatory schemes and are available to different categories of customers.¹⁸ Therefore, Qwest asserts that it developed separate and distinct computerized ordering, inventory, and billing systems for these services.¹⁹ Qwest contends that the differences between these systems are embodied in the circuit ID numbers.²⁰

24 Qwest further argues that the Commission relies heavily on Qwest's past successful conversion from special access circuits to UNEs to require it to retain the same circuit ID number for conversions in this proceeding. Qwest contends that this conclusion is incorrect because Qwest found that process unworkable and created a risk of service degradation.²¹ Qwest argues that our decision is also erroneous because it finds that the use of different circuit ID numbers increases the risk of problems relating to disconnection and reconnection of circuits without recognizing that Qwest converted nearly 1,500 circuits in 2006 without experiencing any problems.²²

25 In the alternative, Qwest proposes to change the alphabetical prefix of circuit ID numbers while retaining the remainder of the number,²³ arguing that this balances the needs of both parties while protecting Eschelon and its customers from service problems related to retaining the same circuit ID number for both UNE and non-UNE products.

26 Eschelon responds that the FCC clearly contemplated that conversion issues would be addressed by state commissions under Section 252 of the Act.²⁴ Eschelon further contends that Qwest's petition fails to comply with WAC 480-07-850(2) because Qwest fails to provide citations to the record in support of its claims.²⁵

¹⁸ *Id.*

¹⁹ *Id.*

²⁰ *Id.* at 12.

²¹ *Id.* at 13.

²² *Id.* at 13 -14. While Qwest raises additional arguments, these arguments are not supported by citations to evidence in the record and are raised for the first time on reconsideration. Accordingly, these arguments do not meet the standards in WAC 480-07-850 and will not be addressed.

²³ *Id.* at 15.

²⁴ See also ¶¶ 12 – 15 above.

²⁵ Eschelon Answer at 17.

27 According to Eschelon, conversions typically only involve changing the rate charged for the facility and, in the vast majority of cases, the facility itself does not change.²⁶ Eschelon contends that a change in regulatory regime reinforces the need for conversions to be transparent and emphasizes that while the conversion reduces Qwest's legal obligations relative to UNEs, it is Eschelon who bears all the risk of failure.²⁷ Eschelon argues that logic dictates that not changing the circuit ID on a properly operating existing facility is less likely to cause service disruption than changing the circuit ID.²⁸ Moreover, Eschelon contends that the Commission properly evaluated the evidence regarding Qwest's process for converting circuits from UNEs to new private line service.²⁹

28 In response to Qwest's alternative proposal, Eschelon asserts that it is not new; Qwest raised the same proposal in an Oregon wire center docket in 2006.³⁰ Eschelon contends that the alternative proposal does not resolve any of the issues Eschelon raised in this case.

29 ***Commission Decision.*** Having already rejected Qwest's jurisdictional argument, we conclude that Qwest's other arguments do not comply with WAC 480-07-850.³¹ The rule is clear that Qwest must demonstrate that our order is erroneous or incomplete and provide citations to the record in support of its reconsideration claims. Qwest fails to do so and, save for its alternative circuit ID proposal which is raised for the first time on reconsideration, fails to raise any new arguments not already considered and rejected by the Commission. As previously stated, a petition for reconsideration requires more than a repetition of prior arguments on an issue.

30 Nor is it appropriate to raise for the first time in a petition for reconsideration new options or proposals that should have been addressed during the evidentiary phase of a docket, when they can be fully vetted through testimony, cross-examination, and rebuttal. At this juncture, our consideration is specifically limited to any errors or

²⁶ *Id.* at 22.

²⁷ *Id.*

²⁸ *Id.*

²⁹ *Id.* at 23.

³⁰ The decision in the Oregon proceeding was admitted as an exhibit in this proceeding: Denney, Exh. No. 169.

³¹ See ¶¶ 16 – 20.

incomplete findings in our previous ruling. Having not previously considered Qwest's alternative circuit ID proposal, we cannot "reconsider" it here.

B. Conversion charge.

31 In Order 18, we agreed with the arbitrator that the \$25.00 conversion rate adopted in Docket UT-073035³² represents a reasonable compromise rate for the conversion process and accepted that rate as an interim rate, subject to revision in an appropriate costing proceeding.³³

32 Qwest reiterates its argument that we lack jurisdiction to address this issue and asserts that the \$25 conversion charge does not compensate Qwest for UNE conversion costs because those costs were not known at the time the charge was agreed upon.³⁴ Qwest asserts that an ILEC must be permitted to recover the costs it incurs to provide interconnection.³⁵

33 Eschelon again responds that we have jurisdiction to address this issue and that Qwest failed to provide appropriate citations to the record in support of its petition. Moreover, Eschelon asserts that Qwest did not provide cost studies in this case despite the requirement that it do so.³⁶ Eschelon contends that there is no evidence in this record to support a conversion charge other than the one adopted by the Commission.³⁷ Eschelon also contends that we already considered and rejected the arguments Qwest raises again here.³⁸

³² *In the Matter of the Petition of Qwest Corporation For Investigation Concerning the Status of Competition and Impact of the FCC's Triennial Review Remand Order on the Competitive Telecommunications Market in Washington*, Docket UT-073035, Order 05 (March 21, 2008). Notice of Finality entered April 17, 2008.

³³ Order 18, ¶¶ 86 – 91.

³⁴ Qwest Petition for Reconsideration at 17.

³⁵ *Id.*

³⁶ Eschelon Answer at 32 – 33. Arbitrator's Report, Order 16, ¶ 173.

³⁷ Eschelon Answer at 33.

³⁸ *Id.*

34 Moreover, Eschelon argues that Qwest agreed to the conversion charge of \$25 when it executed the wire center settlement in June 2007.³⁹ Thus, Qwest voluntarily agreed to a conversion rate before the manner of conversion was determined in this case. Likewise, Eschelon agreed to the \$25 conversion rate at a time when other commissions concluded an appropriate rate should be \$0.00.⁴⁰

35 **Commission Decision.** Consistent with our previous analysis we reject Qwest's jurisdictional argument and find that it has failed to comply with WAC 480-07-850, failed to provide citations to the record, and failed to raise any argument regarding the conversion charge not already considered and rejected. Accordingly, we deny reconsideration of the conversion charge.

3. Commingled Arrangements – Billing.

36 In Order 18, we required Qwest to separately identify commingled components on bills and customer service records, concluding that this balanced Qwest's need to appropriately bill for the separate UNE and non-UNE elements of a commingled arrangement and Eschelon's need to ensure that it was being billed properly.⁴¹

37 Qwest requests reconsideration arguing that the Commission lacks jurisdiction to impose terms and conditions on these services.⁴² Alternatively, Qwest asserts that it is not technologically possible to comply with the ruling absent significant changes to Qwest's operating system and requests a delay in implementation to allow Qwest time to assess feasibility and perform the required changes.⁴³

38 Eschelon responds that it has already addressed Qwest's jurisdictional arguments.⁴⁴ Regarding Qwest's request for delay, Eschelon believes Qwest's claims to be exaggerated; unsupported by data or any citations to evidence in the record.⁴⁵ In

³⁹ *Id.*

⁴⁰ *Id.* at 35.

⁴¹ Order 18, ¶¶ 97 – 100.

⁴² Qwest Petition for Reconsideration at 18 – 19. For a more complete discussion of jurisdiction see ¶¶ 16 -20 above.

⁴³ Qwest Petition for Reconsideration at 19.

⁴⁴ Eschelon Answer at 36.

⁴⁵ *Id.* at 38.

addition, Eschelon points out that the request for delay is open-ended and too vague to assure that the Commission's ruling would ever be implemented.⁴⁶ If the Commission entertains Qwest's request, Eschelon recommends that we require Qwest to regularly provide Eschelon with spreadsheets containing the information identified in our ruling until the billings contain that information.⁴⁷

39 ***Commission Decision.*** Again, and for reasons previously discussed, we reject Qwest's jurisdictional arguments. Qwest's petition for reconsideration of this billing issue fails to comply with the standards set forth in WAC 480-07-850, does not provide citations to the record, and does not raise new arguments that we have not previously considered and rejected.

40 As for delaying implementation of our ruling regarding billing to allow Qwest time to assess its feasibility and perform required changes, Qwest fails to demonstrate that delay is warranted. All that is required of Qwest is a separate listing of commingled elements on billings and customer service records. Since Qwest has the capacity to bill each commingled element at the appropriate UNE or non-UNE rate, it must have already identified the separate elements and their respective rates. Accordingly, it should not be burdensome to simply list the elements. We deny reconsideration of our previous ruling on this issue.

ORDER

THE COMMISSION ORDERS:

- 41 (1) Qwest Corporation's Petition for Reconsideration of Order 18 is denied.
- 42 (2) Qwest Corporation and Eschelon Telecom, Inc., must file an Interconnection Agreement with the Commission, consistent with Order 16 as modified by Order 18, and this Order, no later than 30 days after the service date of this Order.

⁴⁶ *Id.*

⁴⁷ *Id.* at 38 -39.

- 43 (3) The Commission retains jurisdiction over the subject matter and parties to the proceeding to effectuate the terms and conditions of this Order.

Dated at Olympia, Washington, and effective January 30, 2009.

WASHINGTON STATE UTILITIES AND TRANSPORTATION COMMISSION

MARK H. SIDRAN, Chairman

PATRICK J. OSHIE, Commissioner

PHILIP B. JONES, Commissioner

APPENDIX A

GLOSSARY

TERM	DESCRIPTION
Act	The Telecommunications Act of 1996, 47 U.S.C. §251, <i>et. seq.</i>
CLEC	Competitive local exchange company. Not an ILEC, and generally subject to very limited regulation.
Commingling	Commingling is the connection of an unbundled network element or unbundled network element combination with other wholesale facilities and/or services.
Conversion	A conversion occurs when an unbundled network element is converted to a non-unbundled network arrangement.
EEL	Enhanced Extended Links
FCC	Federal Communications Commission
ID	Identification
ILEC	Incumbent local exchange company; a company in operation at the time the Act was enacted (August 1996).
Interconnection	Connection between facilities or equipment of a telecommunications carrier with a local exchange carrier's network under Section 251(c)(2).
Interconnection Agreement or ICA	An agreement between an ILEC and requesting telecommunications carrier (which may be a CLEC) addressing terms, conditions and prices for interconnection, services or network elements pursuant to Section 251.
Network Element	A facility or equipment used in providing telecommunications services.
Section 251(c)(3)	The section of the Act that requires ILECs to provide unbundled access to network elements, or UNEs.
Section 271	The portion of the Act under which Bell Operating Companies, or BOCs, could obtain authority from the FCC to provide long distance service in addition to service within their in-state service areas.
TELRIC	Total Element Long Run Incremental Cost – A method of determining the cost, and thus, prices for network elements using a forward-looking process, rather than the existing network of a carrier.

TERM	DESCRIPTION
TRO	The FCC's Triennial Review Order. An August 2003 Order addressing UNEs and the impairment standard for UNEs, vacated in part and remanded in part by the D.C. Circuit Court of Appeals in <i>USTA II v. FCC</i> .
TRO Remand Order	FCC decision entered in response to D.C. Circuit's USTA II decision: Eliminates local switching as a UNE as of March 11, 2006, and limits unbundling of high-capacity transport and loops. (High-capacity refers to the ability of the facility to handle an amount of information at a single time, e.g., DS1, DS3, Ocn capacity.)
Unbundled	A network element that is provided by itself, not in connection with or "bundled" with another network element. A means for a carrier to request particular services from an ILEC to customize the service it provides, and to avoid an ILEC from offering certain services as a package that the carrier must take as an all or nothing option.
UNE	Unbundled network element. Generally a network element an ILEC must make available under Section 251(c)(3).
Wholesale	Services provided by one carrier to another pursuant to Section 251 of the Act and generally through TELRIC pricing.