



March 18, 2014

Via Email and Overnight delivery

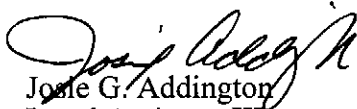
Mr. Steven King, Executive Director and Secretary
Washington Utilities & Transportation Commission
1300 S. Evergreen Park Drive SW
P.O. Box 47250
Olympia, WA 98504-7250

**Re: Docket No. UT-971063
MCImetro Access Transmission Services v. U S West Communications, Inc.**

Dear Mr. King:

Enclosed is the original and 12 copies of CenturyLink's Petition to End Reporting Requirement. A copy was also emailed to you.

Sincerely,


Josie G. Addington
Legal Assistant III

/jga

Enclosure(s)

cc: Jennifer Cameron-Rulkowski
Lisa Gafken
Rocjard B. Severy

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

MCIMETRO ACCESS TRANSMISSION
SERVICES, INC.

Complainant,

v.

U S WEST COMMUNICATIONS, INC.

Respondent

Docket No. UT-971063

CENTURYLINK'S PETITION TO END
REPORTING REQUIREMENT

I. INTRODUCTION

1 Qwest Corporation, d/b/a CenturyLink QC, ("CenturyLink")¹ hereby asks the Commission to issue an order modifying the reporting requirements under the Commission's Decision and Final Order in Docket No. UT-971063.² CenturyLink asks the Commission to find that it is no longer required to provide blocking reports for trunk groups interconnecting with CLECs pursuant to paragraph 279 of the Final Order.

2 CenturyLink has discussed this petition with counsel for Commission Staff and MCImetro/Verizon. Staff does not object to the granting of the relief requested, and MCImetro/Verizon takes no position on the petition.

¹ Qwest Corporation was formerly known as U S WEST Communications, Inc., the original respondent in this 1997 case.

² Docket No. UT-971063 Commission Decision and Final Order Denying Petition to Reopen, Modifying Initial Order, In Part, and Affirming in Part, February 10, 1999. ("Final Order")

II. DISCUSSION

A. Background

3 The Commission's Final Order required CenturyLink to file two reports with the Commission. In paragraph 278, the Commission required a report showing time lines for the installation of local interconnection services used to connect MCImetro's customers to its network. This installation report was ordered for a period of one year after the date of the Final Order. In paragraph 279, the Commission required a report disclosing call blocking data greater than 0.5% on all trunk groups interconnecting with CLECs. This blocking report did not include an expiration date.

4 Qwest previously petitioned to have this requirement eliminated in 2004, but then withdrew the petition later that year, most likely due to opposition by either Staff or MCImetro.

5 In the Initial Order, the Administrative Law Judge described the reason for the blocking report as follows:

Because CLECs have limited means to measure call blockage occurring within U S WEST's network, U S WEST must provide monthly reports of call blockage on CLEC trunk groups to the Commission.³

B. Alternative Blocking Reports Are Available to the Commission and CLECs

6 When the Commission issued its Final Order in early 1999, Qwest did not produce CLEC specific blocking reports. However, since 2003, pursuant to Qwest's Performance Assurance Plan ("PAP"), CLEC aggregate and CLEC specific blocking reports are available to the Commission and CLECs. These reports contain data for numerous performance indicators (referred to as "PIDs", for "performance indicator definition"). The Network Performance PID, NI-1 – Trunk Blocking provides comparisons of CLEC aggregate, individual CLEC, and

³ Ninth Supplemental Order, Initial Order at page 25.

Qwest interoffice trunk blocking results. The reporting is disaggregated as follows:

NI-1A: Interconnection (LIS) trunks to Qwest tandem offices, with TGSR related exclusions as specified in the PID description.

NI-1B: LIS trunks to Qwest end offices, with TGSR related exclusions applied as specified in the PID description.

NI-1C: LIS trunks to Qwest tandem offices, without TGSR related exclusions.

NI-1D: LIS trunks to other Qwest end offices, without TGSR related exclusions.

With these reports CLECs now have access to call blocking measurements within Qwest's network. The CLEC need that was identified in 1998 is now being met via the NI-1 Trunk Blocking PID.

C. Service Quality Performance Reports

7 WAC 480-120-439(8) contains a requirement for Interoffice, intercompany and interexchange trunk blocking reporting. Pursuant to WAC 480-120-439(1), all Class A companies are required to file monthly call blocking reports. Pursuant to WAC 480-120-439(2), Class B companies need not report, but are required to retain data for the prescribed time period. Therefore, the Commission may also now obtain CLEC blocking data directly from the CLECs.

D. Burden of Producing Multiple Trunk Blocking Reports

8 CenturyLink is currently producing four categories of monthly trunk blocking reports which are available to the Commission: The aggregate NI-1 Trunk Blocking PID report; CLEC-specific NI-1 Trunk Blocking PID reports; Interoffice, intercompany and interexchange trunk blocking report pursuant to WAC 480-120-439; and the blocking reports for CLEC trunk groups pursuant to the MCI metro order. The blocking reports filed pursuant to the MCI metro order are manually prepared for this reporting purpose only. A technician pulls the data from

various systems which involves working with approximately five different report screens. Data must be manually entered for the standard blocking percentage, the state, specific carriers and timeframe. The manual process is burdensome and draws resources from the same people that are also preparing the other three blocking reports.

E. Release of CLEC-Specific Data

9 Pursuant to the Performance Assurance Plan, the company provides monthly reports of aggregate CLEC performance results to the Commission. CLEC-specific reports are also available pursuant to a Commission order. The PAP provides that:

“Pursuant to the terms of an order of the Commission, Qwest may provide CLEC-specific data that relates to the PAP, provided that Qwest shall first initiate any procedures necessary to protect the confidentiality and to prevent the public release of the information pending any applicable Commission procedures and further provided that Qwest provides such notice as the Commission directs to the CLEC involved, in order to allow it to prosecute such procedures to their completion.”

10 In light of the availability of CLEC-specific data pursuant to the foregoing PAP procedure, CenturyLink submits that the MCImetro blocking report is no longer needed to satisfy the Commission’s stated requirement in the Ninth Supplemental Order in Docket No. UT-971063.

F. Qwest’s Trunk Blocking Results

11 Qwest’s PID results show that Qwest has consistently met the benchmark for NI-1 Trunk Blocking. Qwest has not received any CLEC blocking complaints since the 1997 MCImetro complaint.

III. CONCLUSION

12 In 1999 the Commission ordered the filing of blocking reports on CLEC trunk groups because CLECs lacked the data to monitor their own trunk blocking. CLECs now have access to data

to self-monitor their trunk blocking. Both CLEC aggregate and CLEC specific trunk blocking data is available via the PID NI-1 – Trunk Blocking.⁴ Qwest's PID results show that Qwest is consistently meeting benchmark standards for NI-1 Trunk Blocking.

- 13 Pursuant to WAC 480-120-439(8), trunk blocking data for all LECs is available to the Commission. A separate manually prepared blocking report is no longer necessary when other blocking reports are available to the Commission. Because the Commission may obtain copies of CLEC-specific PID results pursuant to the terms of the PAP, it is unnecessary for this routine reporting on CLEC-specific circuits to continue.
- 14 For the foregoing reasons, the Commission should issue an order modifying its Final Order and eliminating the CLEC trunk blocking report requirement effective immediately.

DATED this 18th day of March, 2014.

QWEST



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⁴ SGAT: Exhibit B, Service Performance Indicator Definitions and Exhibit K, Performance Assurance Plan.

CERTIFICATE OF SERVICE
Docket No. UT-971063

I certify that I have caused to be served copies of **CenturyLink's Petition to End Reporting Requirement** via email and UPS overnight delivery on the following parties:

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DATED this 18th day of March 2014.



Josie Addington