BEFORE THE WASHINGTON STATE
UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of the Joint Application of QWEST COMMUNICATIONS INTERNATIONAL, INC. AND CENTURYTEL, INC. For Approval of Indirect Transfer of Control of Qwest Corporation, Qwest Communications Company LLC, and Qwest LD Corp. ……	)))))))))))	Docket No. UT-100820

EXHIBIT BJJ-17

TO THE

RESPONSIVE TESTIMONY

OF

BONNIE JOHNSON

ON BEHALF OF INTEGRA TELECOM

September 27, 2010

Attachment N: Failure to Assign the Best Available Loop

I. QWEST NOT ASSIGNING THE BEST AVAILABLE LOOP – ASSIGNING TO VOICE PARAMENTERS FOR CLECs	
Description of Events	**Description of Qwest's Response**
On 10/19/09, Integra submitted Local Service Request (LSR) PON: BS-2334098-HDSL requesting a 2-Wire Non-Loaded (NC Code – LX-N) HDSL (NCI code: 02QB9.00H) Loop. Integra authorized the charges to condition the loop.	Qwest delivered Circuit ID 3.LXFU.562922..NW with 110 feet of Bridge Tap.[1] Bridge Tap is known to have a potential negative impact on DSL signals. Qwest's Raw Loop Data – Unassigned by Address indicates that there are at least two loops available without Bridge Tap at this end user customer's service address. The CLEC is unable to reserve or select the loop that would best meet the technical parameters. Qwest has sole control over the assignment process, and the Qwest assignment process did not select the best loop.

[1] The Bridge Tap on the circuit in this example is not currently interfering with the HDSL service. If Qwest later makes a network change that results in the Bridge Tap causing interference, however, Qwest should remove the Bridge Tap. Its current policy, however, is to refuse to do so. Qwest claims Qwest has ***no obligation to repair*** it to the standard that HDSL will continue to work." Qwest attorney Daphne Butler, 4/1/09 letter to Integra (emphasis added). See Attachment C(23), p. 107 & Attachment A, Row No. 5.

Excerpts from Local Service Request (LSR) PON BS-2334098-HDSL, which confirms Integra requested conditioning (SCA = Y) and confirms Integra ordered a 2-Wire Non-Loaded HDSL compatible loop.

Order Information

PON: **BS-2334098-HDSL** VER: **1**

REQTYP: **A - Unbundled Loop** B - Firm Order

Activity: **N - New Installation and/or Account**

TOS: **1 - Business**

Admin

PG_of_	D/T SENT
	200910191650

DSPTCH	DDD	APPTIME	APTCON	DDDO	DFDT
	2009/10/23				

PROJECT	CHC	TEST
		N - No Testing

REQTYPE	ACT	RSTTYP	CIP	CSO1:	CSO2:	PMI
AB	**N**					

CONVIND	MI	SUP	EXP	RTR
				D - Confirmation of LSR & DLR

CC	AENG	ALBR	SCA
7482			**Y - Yes**

AGAUTH	DATED	AUTHNM
Y - Authorization	**2009/09/30**	**[Customer Identifying information Redacted]**

PORTTYP:	ACTL:	AI	APOT:	LST:	LSO:	TOS:	NPDI:	SPEC:
					651452	**1**		

NC:	NCI:	SECNCI:	RPON:	RORD:	DLQTY:
LX-N	**02QB9.00H**	**02DU9.00H**			**0**

Excerpts from the Qwest Completion Notice for PON BS-2334098-HDSL which confirms Qwest delivered 2 Wire Non-Loaded loop on Circuit ID 5.LXFU.562922..NW.

Service Order Processor Completion Notice

Service Order Processor Completion Notice Sent: 10/21/2009 14:39, MDT

```
Completion Notice for LSR_ID:  29444411

######## Administration Section
##############################################

  CCNA  CC--  PON------------  VER  LSR-NO  C/TSENT---------------
  O03   7482  BS-2334098-HDSL  1            10/21/2009 02:39:41 PM

######## Order Information Section
########################################

  ORDER-REF-NUM  ORD------  CD--------  AN--------------
  1              N49853634  10/21/2009  651 W30-2301-634
S&E Section:
     ACTION  USOC/FID

             ICKI  A1/CLS 3.LXFU.562922..NW
             /CKR  HDSL2.[Customer Identifying Information Redacted]
OICE.1

             ICKL  1-.[Customer Identifying Information Redacted]
             /CFA  .[Customer Identifying Information Redacted]
             /TAR MN1909

             ILCON  NR, 000 000-0000
     I1      TYLCQ/NC LX-N/NCI 02QB9.00H/ZCID O03

              ICKL  2-.[Customer Identifying Information Redacted] /LSO
      651 452/TAR MN1909
             /SN  .[Customer Identifying Information Redacted]

             ILCON  .[Customer Identifying Information Redacted]
     I1      U23WX/NC LX-N/NCI 02DU9.00H/CNC 1CRUL/ZCID O03/RTZ 4
     I1      1CRUL/ZCID O03
     I1      VT6TU/ZCID O03
     I1      URCTC/ZCID O03
     I1      URCTD/ZCID O03
```

Excerpts from the Qwest Interconnect Mediated Access (IMA) Pre-Order Raw Loop Data Assigned by Address which confirms that Qwest assigned and delivered 3.LXFU.562922..NW (2-Wire non-loaded loop) on facility, with a Bridge Tap.

Begin (22 of 22) -- Raw Loop Data Query By Assigned Address

WTN:

CIRCUIT ID (ECCKT) :

3.LXFU.562922..NW CKL 2

TPRDI :	Loop Status:
	WKG

Begin (1 of 2) -- Raw Loop Data Query By Assigned Address

TERMINAL ID:

X 2990 LONE OAK CIR

CABLE NAME:	PAIR GAIN TYPE:	PAIR NUMBER:	LCT:	LOAD POINTS AMOUNT:
25	**NO_PG**	**303**		**0**

BRIDGE TAP OFFSET:

4 1.771

MAKE UP DESC:

24AWG 1.781kf 26AWG
0.025kf 24AWG 0.490kf
26BT 0.110kf

End (1 of 2) -- Raw Loop Data Query By Assigned Address
Begin (2 of 2) -- Raw Loop Data Query By Assigned Address

TERMINAL ID:

I .[Customer Identifying Information Redacted]

CABLE NAME:	PAIR GAIN TYPE:	PAIR NUMBER:	LCT:	LOAD POINTS AMOUNT:
2990L	**NO_PG**	**2492**		**0**

BRIDGE TAP OFFSET:

MAKE UP DESC:

24AWG 2.020kf 26AWG
0.980kf 24AWG 0.720kf

Excerpts from the IMA Pre-Order Raw Loop Data Un-assigned by Address which confirms that there were at least two loops without Bridge Tap at the end user customer's location. This also confirms that CLECs are unable to reserve or select the best available facility.

Raw Loop Data Query By UnAssigned Address

Query by Address

This query will NOT reserve these facilities. This is a query

Begin (4 of 20) -- Raw Loop Data Query By UnAssigned Address

WTN:

CIRCUIT ID (ECCKT) :

TPRDI :	Loop Status:
	CNF

Begin (1 of 2) -- Raw Loop Data Query By UnAssigned Address

TERMINAL ID:

X 2990 LONE OAK CIR

CABLE NAME:	PAIR GAIN TYPE:	PAIR NUMBER:	LCT:	LOAD POINTS AMOUNT:
5	**NO_PG**	**563**		**0**

BRIDGE TAP OFFSET:

MAKE UP DESC:

22AWG 1.517kf 24AWG 0.510kf

End (1 of 2) -- Raw Loop Data Query By UnAssigned Address

Begin (2 of 2) -- Raw Loop Data Query By UnAssigned Address

TERMINAL ID:

I .[Customer Identifying Information Redacted]

CABLE NAME:	PAIR GAIN TYPE:	PAIR NUMBER:	LCT:	LOAD POINTS AMOUNT:
2990L	**NO_PG**	**2457**		**0**

BRIDGE TAP OFFSET:

MAKE UP DESC:

24AWG 2.020kf 26AWG
0.980kf 24AWG 0.720kf

End (2 of 2) -- Raw Loop Data Query By UnAssigned Address
Begin (7 of 20) -- Raw Loop Data Query By UnAssigned Address

WTN:

CIRCUIT ID (ECCKT) :

TPRDI :	Loop Status:
	CNF

Begin (1 of 2) -- Raw Loop Data Query By UnAssigned Address

TERMINAL ID:

X 2990 LONE OAK CIR

CABLE NAME:	PAIR GAIN TYPE:	PAIR NUMBER:	LCT:	LOAD POINTS AMOUNT:
25	**NO_PG**	**277**		**0**

BRIDGE TAP OFFSET:

MAKE UP DESC:

24AWG 1.781kf 26AWG
0.025kf 24AWG 0.490kf

End (1 of 2) -- Raw Loop Data Query By UnAssigned Address
Begin (2 of 2) -- Raw Loop Data Query By UnAssigned Address

TERMINAL ID:

I .[Customer Identifying Information Redacted]

CABLE NAME:	PAIR GAIN TYPE:	PAIR NUMBER:	LCT:	LOAD POINTS AMOUNT:
2990L	**NO_PG**	**2419**		**0**

BRIDGE TAP OFFSET:

MAKE UP DESC:

24AWG 2.020kf 26AWG
0.980kf 24AWG 0.720kf