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Jeffrey J. Carlisle
Chief, Wireline Competition Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

**Re: Unbundled Access to Network Elements, WC Docket No. 04-313;
Review of Section 251 Unbundling Obligations for Incumbent Local
Exchange Carriers, CC Docket No. 01-338**

Dear Mr. Carlisle:

This submission responds to your letter of February 4, 2005, asking Qwest to provide a list identifying by Common Language Location Identifier (CLLI) code which wire centers in Qwest's operating areas satisfy the Tier 1, Tier 2 and Tier 3 criteria for dedicated transport, and identifying by CLLI code the wire centers that satisfy the nonimpairment thresholds for DS1 and DS3 loops in the *Triennial Review Remand Order*.¹

Enclosed are two attachments. Attachment A identifies which of Qwest's approximately 1,200 wire centers satisfy the Tier 1, Tier 2 and Tier 3 criteria adopted in the *Triennial Review Remand Order*. Attachment B lists the wire centers that satisfy the nonimpairment standards for DS1 and DS3 loops in the *Order*. These classifications were made based on the definitions of "business line" and "fiber-based collocator" in the *Order*.

Business Lines. Consistent with the definition in the *Order*,² Qwest determined the number of "business lines" in each wire center by computing the sum of the following:

¹ *In the Matter of Unbundled Access to Network Elements; Review of the Section 251 Unbundling Obligations of Incumbent Local Exchange Carriers*, WC Docket No. 04-313, CC Docket No. 01-338, *Order on Remand* ("Triennial Review Remand Order" or "*Order*").

² 47 C.F.R. § 51.5, as attached (Appendix B) to the *Order*, to be published in the Federal Register and codified in the C.F.R.

Attachment C

- Qwest's switched business access lines (*i.e.*, single, multiline and Public Access (Coin) Lines) in the wire center, based on Qwest's most recent ARMIS Report 43-08 data, which is current as of December 2003 and was filed with the Commission in April 2004. This figure includes ISDN and other digital access lines. Each 64 kbps-equivalent has been counted as one line.
- UNE loops connected to that wire center, including UNE loops provisioned in combination with other unbundled elements (*e.g.*, EELs and business UNE-P lines). Each 64 kbps-equivalent has been counted as one line. Thus, for example, each DS1 loop has been counted as 24 business lines. Qwest does not track UNE-P separately by residential and business. Qwest derived an estimate of business UNE-P lines in each wire center based on the percentage of white page listings for that wire center that are business, rather than residential. All of these data are current as of December 2003.

Fiber-Based Collocators. Qwest also verified the number of collocation arrangements that satisfy the *Order's* definition of "fiber-based collocator," for each wire center that would qualify for unbundling relief for high capacity loops or transport, based on the nonimpairment standards adopted in the *Order*. Qwest used its most current billing data, as of February 2005, and physical inspections to identify collocation arrangements that satisfy the definition in the *Order*. To the best of its knowledge, Qwest has counted each collocator and any of its affiliates as only one collocator for purposes of this analysis.

To the extent this submission, or similar submissions by other incumbents, raise any questions or disputes, those issues should be addressed by the Commission, rather than state commissions. The Commission clearly is in the best position to address these issues in an expeditious manner. Over the past several years, the Commission has dealt with very similar issues in evaluating numerous petitions for pricing flexibility filed by price cap LECs. In that context, the petitioning price cap LEC must provide individual notification to each CLEC upon which the price cap LEC's petition relies. The notification identifies the information that the price cap LEC has included in its petition, such as the wire centers in which the CLEC has fiber-based collocation. The CLECs then have 15 days to file comments or objections to the petition.³ The Commission's experience in the pricing flexibility context demonstrates that it is well equipped to resolve any disputes that may arise regarding the accuracy of the ILEC's fiber-based collocation and other data. Adoption of a similar procedure here would ensure that these factual disputes are resolved quickly and efficiently.

The Commission is also best suited to address any questions of interpretation of the *Order* that may arise in determining which wire centers and routes are affected by the *Order*. In the pricing flexibility context, a number of similar questions arose when the first several pricing

³ See 47 C.F.R. § 1.774(c), (e).

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flexibility petitions were filed. To the extent such issues arise here, the Commission should resolve those questions to ensure a consistent application of the *Order*.

Please let us know if you have further questions about this matter.

Sincerely,

/s/ Gary R. Lytle

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