

**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF SOUTH DAKOTA**

**In the Matter of Qwest Corporation dba  
CenturyLink QC's Petition for Approval  
of Non-Impaired Wire Center Lists  
Pursuant to the Triennial Review  
Remand Order**

**Docket No. TC13-109**

**AFFIDAVIT OF RENÉE ALBERSHEIM**

STATE OF COLORADO                    )  
  ) ss.  
COUNTY OF DENVER                    )

I, RENÉE ALBERSHEIM, being first duly sworn, depose and state that:

1. My name is Renée Albersheim. I am employed by CenturyLink as a Lead Witnessing Representative for the Wholesale Organization. My business address is 930 15<sup>th</sup> Street, 6<sup>th</sup> Floor, Denver Colorado, 80202.
2. In June, 2007, Qwest and the Joint CLECs (Covad Communications Company, Eschelon Telecom, Inc., Integra Telecom Holdings, Inc., McLeodUSA Telecommunications Services Inc., Onvoy, POPP.Com, US Link, inc. d/b/a TDS Metrocom, Inc. and XO Communications Services, Inc. entered into a Settlement agreement to develop and approve a list of *TRRO* Non-Impaired Wire Centers and a process for future updates of the wire center list. Consistent with the processes and procedures contained in the "Multi-State Settlement Agreement Regarding Wire Center Designations and Related Issues" which was filed with this Commission on August 30th, 2013 (here after referred to as "Settlement Agreement"), CenturyLink has filed a list of additional Non-

**Appendix 1**

Impaired Wire Centers on August 30th, 2013 with the South Dakota Public Regulation Commission.

3. In support of the filing, I supervised an inventory of Fiber-Based Collocators in CenturyLink Wire Centers to ascertain the number of fiber-based collocators in each wire center and the appropriate "Tier" designation. The Tier was subsequently used to establish Non-Impairment. Highly-Confidential Attachment A to this affidavit, "Collocations by Wire Center", details the Tier designation by wire center and details the number and identity of the fiber-based collocators in each wire center.
4. As part of that inventory, and as required under the terms of the Settlement Agreement, I oversaw a physical field verification of the inventoried fiber-based collocators, and cross-referenced the physical inventory data with the corresponding order and construction records and billing data. The results of that physical field verification (The Collocation Verification Worksheets) are contained in Highly Confidential Attachment B to this affidavit.
5. Additionally, I supervised research of the billing records for the collocation space and the active power supply to each collocation to ensure that each collocation was indeed an active fiber-based collocation and that the operators of these fiber-based collocations met the FCC's definition of a Fiber-Based Collocator.
6. CenturyLink sent each of the identified Fiber-Based Collocators a letter requesting further validation of their status as a Fiber-Based Collocator. Based on their responses, and if necessary, I oversaw the reconciliation of any discrepancies as to the physical aspects of the collocation (as noted on the physical verification worksheets) or in information with respect to changes in ownership, mergers and/or acquisitions (See Highly-Confidential Attachment C for a copy of the letters). No responses were received from CLECs operating in South Dakota.

7. CenturyLink undertook a thorough analysis to ensure that the number of Fiber-Based Collocators in CenturyLink Wire Centers was accurately counted. Its process for identifying fiber-based collocators meeting the FCC's definition produced an accurate and verified count. The resulting determination of a change in the non-impairment status of South Dakota Wire Centers, having relied on this accurate and verified data, is by extension just as accurate and should be validated by this Commission.
8. This accurate and verified data on the number of Fiber-Based Collocators was the sole determining factor in establishing which additional South Dakota wire centers were Non-Impaired. The numbers of Business Lines in each Wire Center based on the most recently filed ARMIS 43-08 data, and having no impact on the non-impairment status of any South Dakota wire centers at this time, were not considered for this filing.

Further this affiant sayeth not.

DATE: September 9, 2013

*Renée Albersheim*  
RENEE ALBERSHEIM

SUBSCRIBED AND SWORN to before me the 9th day of September, 2013.

*Jean M. Towner*  
NOTARY PUBLIC

My Commission Expires:

4-13-2014

