### BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

IN THE MATTER OF THE INVESTIGATION INTO QWEST WIRE CENTER DATA ) ) ) DOCKET NO. 06-049-40 )

### SURREBUTTAL TESTIMONY

### OF

### **RACHEL TORRENCE**

### **ON BEHALF OF**

## **QWEST CORPORATION**

JUNE 5, 2006

# TABLE OF CONTENTS

I.	IDENTIFICATION OF WITNESS1
II.	PURPOSE OF SURREBUTTAL TESTIMONY1
III.	QWEST'S METHODOGY IS SOUND AND OBJECTIVELY APPLIED2
IV.	CONCLUSION4

### I. **IDENTIFICATION OF WITNESS** 1 0. PLEASE STATE YOUR NAME, BUSINESS ADDRESS AND POSITION WITH 2 **OWEST CORPORATION.** 3 My name is Rachel Torrence. My business address is 700 W. Mineral Ave., Littleton 4 A. Colorado. I am employed as a Director within the Network Policy Group of Owest 5 Services Corporation. I am testifying on behalf of Qwest Corporation and its affiliates 6 7 (Qwest). HAVE YOU PREVIOUSLY FILED TESTIMONY IN THIS DOCKET? 8 0. 9 A. Yes, I filed direct testimony in this docket on March 24, 2006, and responsive testimony on May 24, 2006. 10 II. PURPOSE OF SURREBUTTAL TESTIMONY 11 WHAT IS THE PURPOSE OF YOUR TESTIMONY? 0. 12 The purpose of this surrebuttal testimony is to respond to the testimony of Mr. Casey A. 13 14 Coleman, which was filed on May 26, 2006 in this proceeding on behalf of the Utah Division of Public Utilities (DPU). Mr. Coleman's testimony in part addresses the non-15 impaired wire center list and methodology. 16 Mr. Coleman represents that the DPU and Qwest are in agreement on the two tests, 17 described in my direct testimony on page 5 lines 1 through 4, that were used to determine if 18 a wire center is non-impaired based on the number of fiber-based collocators, and/or the 19 number of business lines for a wire center. Mr. Coleman also represents that the DPU 20

agrees with the sufficiency of Qwest's efforts to get accurate information in counting the

22		fiber-based collocators. Mr. Coleman affirms the DPU's belief that the classification for
23		Tier 1 and 2 which I provided in my Direct Testimony should be accepted, that the CLECs
24		have had sufficient time to challenge the designations, and that their lack of response can
25		be considered assent. My testimony will address Mr. Coleman's stated concerns regarding
26		the Salt Lake City West and Salt Lake City South wire centers appearing on the list of
27		impaired wire centers on July 7, 2005. My testimony will show that Qwest's methodology
28		and application appropriately listed these wire centers following the FCC's requirements.
29		III. OWEST'S METHODOGY IS SOUND AND OBJECTIVELY APPLIED
-		
30	Q.	PLEASE COMMENT ON MR. COLEMAN'S CONCERN, STATED IN LINES 194
31		THROUGH 205 OF HIS TESTIMONY, REGARDING THE SALT LAKE CITY
32		WEST AND SALT LAKE CITY SOUTH WIRE CENTERS APPEARING ON THE
33		LIST OF IMPAIRED WIRE CENTERS ON JULY 7, 2005?
34	А.	The FCC's made their Order (FCC 04-290) effective on March 11, 2005. They did not,
35		however, require the noticing to the CLECs or production of the list of the non-impaired
36		wire centers on that date. Given the short timeframe from the order date of February 4,
37		2005 and the effective date of March 11, 2005, it is reasonable that the noticing of the non-
38		impaired offices could follow at a later date, especially since Qwest did not apply an
39		immediate change to the CLECs in terms of ordering capability or in billing. The noticing
40		via the provision of the list of wire centers on July 7, 2005 allowed Qwest the time to
41		appropriately gather and assess accurate information in counting the fiber-based
42		collocators. Further, Qwest's criteria in our review of the fiber collocations included the
43		requirement that the collocation was in place as of March 11, 2005. The list of wire centers,

22

44	while appearing on July 7, 2005, was, in fact, reflective of those that met the criteria for the
45	March 11, 2005 date. The Salt Lake City West and Salt Lake City South wire centers are
46	appropriately listed, as our wire center validation efforts showed that the fiber-based
47	collocations for these particular wire centers were operational as of March 11, 2005.

# 48 Q. MR. COLEMAN SUGGESTS, IN LINES 188 THROUGH 193 OF HIS 49 TESTIMONY, THAT THE WIRE CENTERS IN THIS DOCKET COULD BE 50 IMPACTED "DOWN THE ROAD" DUE TO MERGERS. DO YOU AGREE?

Mr. Coleman's assumption that the wire center list is subject to change due to future 51 A. mergers is only correct to the extent that the FCC specifically states such a condition, as 52 they did in the SBC/AT&T Merger Order (FCC 05-183). It would be up to the FCC to 53 make such a requirement, and, as they did in the SBC/AT&T merger, they would state the 54 conditions and requirements. The FCC requirements in the TRRO Order (FCC 04-290) 55 state, in paragraph 102, that "... parties shall only count multiple collocations at a single 56 wire center by the same or affiliated carriers as one fiber based collocation." These 57 requirements apply to the fiber collocation as of the effective date of the Order, March 11, 58 2005. Owest has applied these requirements in gathering and assessing accurate 59 information in counting the fiber-based collocators. At this time, as Mr. Coleman points 60 out, no other subsequent mergers have, at the FCC's direction, had impact to the list for 61 Utah. When and if they do, Qwest will follow the requirements as they are called out in the 62 FCC orders, as we have done here. 63

**IV. SUMMARY OF TESTIMONY** 64 PLEASE PROVIDE A BRIEF SUMMARY OF YOUR TESTIMONY. 65 Q. A. Qwest's methodology for determining the number of fiber-based collocators in the affected 66 non-impaired Utah wire centers is sound and is objectively applied. This methodology 67 68 yields an accurate list of non-impaired wire centers in the state of Utah. The listing of the wire centers appropriately shows those fiber based collocators as of the FCC's stated 69 effective date of the TRRO Order (FCC 04-290) as March 11, 2005. 70 CONCLUSION IV. 71 DOES THIS CONCLUDE YOUR TESTIMONY? **O**. 72 73 A. Yes it does. Thank you.