BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of Qwest Corporation d/b/a CenturyLink QC's Petition for Commission Approval of 2015 Additions to its Non-Impaired Wire Center List Docket No. 15-049-10

QWEST CORPORATION D/B/A CENTURYLINK QC'S COMMENTS

On July 15, 2015, the Utah Division of Public Utilities (DPU), filed comments requesting that, "The Commission should allow an additional 14 days for the Division to complete their verification of the non-impaired wire centers as submitted by CenturyLink in this Docket." The DPU also stated in its comments that, "The Division has conducted an investigation to verify the CLECs named in the petition are co-located in each wire center. As of this date the Division has received confirmation from all but one of the listed CLECs. The Division anticipates being able to complete its analysis within 14 days and requests the Commission allow additional time so the Division can complete its inquiries.¹"

Evidently as a result of the DPU's request, on July 16, 2015, the Commission issued an Amended Notice of Comment Period, providing the opportunity for any interested party to file comments by July 29, 2015, which is consistent with the 14 extra days requested by the DPU, and reply comments by August 10, 2015.²

¹ Docket No. 15-049-10, Utah Division of Public Utilities Comments, http://www.psc.utah.gov/utilities/telecom/telecomindx/2015/1504910indx.html

² Docket No. 15-049-10, Public Service Commission, Amended Notice of Comment Period, July 16, 2015, "Any interested party may submit comments on the above application no later than Wednesday, July 29, 2015, and reply comments may be submitted no later than Monday, August 10, 2015." http://www.psc.utah.gov/utilities/telecom/telecomindx/2015/1504910indx.html

Even though the DPU requested 14 more days in its July 15 comments, it was able to complete its verification and review prior to the requested 14 days and filed comments on July 23, 2015, or 8 days after its July 15 filing. In its July 23, 2015 comments the DPU recommend that, "The Commission should add American Fork, Kaysville and Salt Lake City East wire centers to its non-impaired wire center list in accordance with the FCC's Triennial Review Remand Order ("TRRO")." The DPU also stated in its comments that, "The Division has conducted an investigation to verify the CLECs named in the petition are co-located in each wire center. The Division was able to contact each CLEC and confirm the co-location for each specific wire center. Each company responded that they did have facilities as filed by CenturyLink. The Division agrees with CenturyLink that based on the number of collocators American Fork, Kaysville and Salt Lake City East should be added to the non-impaired wire center list.3"

Based upon the DPU's July 23, 2015 comments, which were a result of an independent investigation and verification, CenturyLink respectfully request that the Commission approve CenturyLink's petition that was filed on June 15, 2015.

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³ Docket No. 15-049-10, DPU's July 23, 2015 Comments, http://www.psc.utah.gov/utilities/telecom/telecomindx/2015/1504910indx.html

Dated: July 29, 2015

Respectfully submitted,

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