

**BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH**

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In re Petition of Qwest Corporation to  
Open a Commission Investigation and  
Adjudicatory Proceeding to Verify Qwest  
Wire Center Data and Resolve Related Issues

Docket No. \_\_\_\_\_

**QWEST CORPORATION'S PETITION  
TO OPEN A COMMISSION  
INVESTIGATION AND  
ADJUDICATORY PROCEEDING TO  
VERIFY QWEST WIRE CENTER  
DATA AND RESOLVE RELATED  
ISSUES**

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**ATTACHMENT**

**A**



**Qwest**  
607 14<sup>th</sup> Street, N.W., Suite 950  
Washington, DC 20005  
Phone 202-429-3100  
Facsimile 202-467-4268

**Gary R. Lytle**  
Senior Vice President-Federal Relations

February 18, 2005

**FILED VIA ECFS**

Jeffrey J. Carlisle  
Chief, Wireline Competition Bureau  
Federal Communications Commission  
445 12<sup>th</sup> 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*.<sup>1</sup>

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*,<sup>2</sup> Qwest determined the number of "business lines" in each wire center by computing the sum of the following:

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<sup>1</sup> *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")*.

<sup>2</sup> 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.

- 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.<sup>3</sup> 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

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<sup>3</sup> See 47 C.F.R. § 1.774(c), (e).

Mr. Jeffrey J. Carlisle  
February 18, 2005

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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

cc: Michelle Carey (via e-mail at [michelle.carey@fcc.gov](mailto:michelle.carey@fcc.gov))  
Thomas Navin (via e-mail at [thomas.navin@fcc.gov](mailto:thomas.navin@fcc.gov))  
Jeremy Miller (via e-mail at [jeremy.miller@fcc.gov](mailto:jeremy.miller@fcc.gov))  
Ian Dillner (via e-mail at [ian.dillner@fcc.gov](mailto:ian.dillner@fcc.gov))

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VERIFY QWEST WIRE CENTER  
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**ATTACHMENT**

**B**



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**Cronan O'Connell**  
Vice President-Federal Regulatory

July 8, 2005

**FILING VIA ECFS**

Thomas Navin  
Chief, Wireline Competition Bureau  
Federal Communications Commission  
445 12<sup>th</sup> 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. Navin:

On February 18, 2005, in response to a request by the Wireline Competition Bureau, Qwest submitted lists identifying by Common Language Location Identifier ("CLLI") code the wire centers in Qwest's operating area satisfying the nonimpairment thresholds for high capacity transport and loop facilities established in the *Triennial Review Remand Order* ("TRRO").<sup>1</sup> Since that time, Qwest has undertaken a detailed verification process to ensure the accuracy of these lists. As a result of this review, Qwest hereby submits revised lists of the wire centers in Qwest's region meeting the TRRO's nonimpairment thresholds for high capacity transport and loop facilities.

Enclosed are two attachments. Attachment A identifies which of Qwest's approximately 1200 wire centers satisfy the Tier 1, Tier 2, and Tier 3 criteria adopted in the TRRO. As shown in Attachment A, there are 46 and 30 Qwest wire centers that satisfy the Tier 1 and Tier 2 criteria, respectively. Attachment B lists the Qwest wire centers that satisfy the nonimpairment standards for DS1 and DS3 loops in the TRRO. As reflected in Attachment B, Qwest has been relieved of unbundling requirements for DS1 and DS3 loops in 4 and 7 Qwest wire centers, respectively. The lists in Attachments A and B are also being posted on Qwest's website.<sup>2</sup>

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<sup>1</sup> Letter from Gary R. Lytle, Senior Vice President-Federal Relations, Qwest, to Jeffrey J. Carlisle, Chief, Wireline Competition Bureau, FCC (filed Feb. 18, 2005).

<sup>2</sup> Qwest has not rejected any orders for unbundled transport or unbundled loops in the wire centers identified in the lists of nonimpaired wire centers submitted on February 18. Competitive local exchange carriers ("CLECs") can continue to order high capacity transport and loops in all Qwest wire centers until their interconnection agreements with Qwest have been amended to reflect the TRRO.

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July 8, 2005

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On March 29, 2005, Qwest initiated a three-step process to ensure the accuracy of its wire center data. *First*, Qwest provided access for CLECs and state public service commission staff to the confidential data underlying the February 18 lists of Qwest wire centers meeting the nonimpairment thresholds in the *TRRO*. The confidential data were made available pursuant to the terms of the applicable protective order and included the following information for each wire center identified in one or both of the February 18 lists:

- ARMIS 43-08 business line information
- UNE-P lines
- UNE-loop data
- fiber-based collocator information

*Second*, Qwest provided to each party upon which it relied for unbundling relief in the February 18 filing a list of the relevant wire centers where that party has fiber-based collocation, according to Qwest's records. Those parties then had the opportunity to contest the accuracy of that information. This process is similar to that employed by the Commission in the pricing flexibility dockets to verify the accuracy of the collocation information relied on in those proceedings. In light of the highly sensitive nature of the collocation information, Qwest allowed each collocator access only to its own collocation information in the relevant wire centers.

*Third*, Qwest conducted a further internal check of the collocation and line count data used to generate the February 18 wire center lists, including a comprehensive review of the collocation arrangements in Qwest's wire centers.

A number of parties took advantage of this process to gain further information about the data underlying Qwest's lists of nonimpaired wire centers, or to question the validity of Qwest's line count or collocation data. Qwest also answered numerous detailed questions from CLECs about the methodology used to identify nonimpaired wire centers.

Through this verification process, Qwest identified a number of data inaccuracies in the lists of nonimpaired wire centers submitted on February 18. *First*, Qwest discovered that, in some cases, it had counted a fiber-based collocator twice because the Qwest records used for the February 18 filing did not reflect the affiliation of that collocator with another fiber-based collocator in that wire center. In several cases, CLECs notified Qwest of these affiliations in response to the collocation information provided by Qwest in the March 29 letters noted above. To address any lingering concerns of double counting, Qwest checked other data sources to determine potential affiliations and then sent letters to the affected carriers requesting verification of those or any other affiliations. *Second*, Qwest found that, in a small number of cases, collocation arrangements using dark fiber transport leased from Qwest had been counted as fiber-based collocations, due to inaccuracies in service orders. *Third*, Qwest discovered that certain collocation arrangements counted in the February 18 filing had been decommissioned or

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otherwise were not operational. *Fourth*, Qwest identified additional fiber-based collocators that it had not counted as fiber-based collocators for purposes of the February filing. Due to the compressed timeframe for the inspections in February, Qwest ignored numerous collocation arrangements that could not readily be verified as fiber-based collocators at that time. Upon further investigation in April and May, Qwest was able to confirm that some of these arrangements did in fact qualify as fiber-based collocation arrangements.<sup>3</sup>

Qwest has corrected all inaccuracies in its data that were discovered through the verification process described above, and, as necessary, has revised its count of wire centers meeting the nonimpairment thresholds for high capacity transport and loops in Attachments A and B.

Please let me know if you have any questions about this matter.

Sincerely,

/s/ Cronan O'Connell

#### Attachments

cc: Julie Veach (via e-mail at [Julie.Veach@fcc.gov](mailto:Julie.Veach@fcc.gov))  
Jeremy Miller (via e-mail at [Jeremy.Miller@fcc.gov](mailto:Jeremy.Miller@fcc.gov))  
Ian Dillner (via e-mail at [Ian.Dillner@fcc.gov](mailto:Ian.Dillner@fcc.gov))

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<sup>3</sup> Qwest is in the process of notifying the owners of these collocation arrangements that Qwest is now relying on these collocation arrangements for unbundling relief, so that the collocators have an opportunity to verify the accuracy of this collocation data. If this further verification results in any changes in the number of fiber-based collocators in particular wire centers, Qwest will revise its list of nonimpaired wire centers as necessary.



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**ATTACHMENT  
C**



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**Cronan O'Connell**  
Vice President-Federal Regulatory

August 18, 2005

*EX PARTE*

*FILING VIA ECFS*

Thomas Navin  
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Federal Communications Commission  
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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. Navin:

On February 18, 2005, in response to a request by the Wireline Competition Bureau, Qwest submitted lists identifying by Common Language Location Identifier ("CLLI") code the wire centers in Qwest's operating area satisfying the nonimpairment thresholds for high capacity transport and loop facilities established in the *Triennial Review Remand Order* ("TRRO").<sup>1</sup> On July 8, 2005, after completing a detailed verification process, Qwest filed revised lists of the wire centers in Qwest's region meeting the TRRO's nonimpairment thresholds for high capacity transport and loop facilities.<sup>2</sup>

It has recently come to our attention that one of the wire centers listed in Attachment B "Triennial Review Remand Order, Qwest Wire Centers that Satisfy the Nonimpairment Standards for DS1 and DS3 Loops, Sorted by Loop Type" was correctly identified by "CLLI8", but the "Wire Center Name" for the wire center was incorrect. The affected wire center CLLI8 is "DNVRCOMA", which was identified as "Colorado Springs Main" on the July 8<sup>th</sup> filing. The correct name for the wire center is "Denver Main." We have verified that all data provided is correctly associated with the CLLI code for Denver Main (DNVRCOMA). As a result, we are submitting a revised list of wire centers in Qwest's operating area that satisfy the nonimpairment

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<sup>1</sup> Letter from Gary R. Lytle, Senior Vice President-Federal Relations, Qwest, to Jeffrey J. Carlisle, Chief, Wireline Competition Bureau, FCC (filed Feb. 18, 2005).

<sup>2</sup> Letter from Cronan O'Connell, Vice President-Federal Regulatory, Qwest, to Thomas Navin, Chief, Wireline Competition Bureau, FCC (filed July 8, 2005).

Mr. Thomas Navin  
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thresholds established in the *TRRO*, correcting only the wire center name for this one wire center. Although there are no changes to Attachment A, we are submitting the entire filing for ease of use by interested parties.

Please let me know if you have any questions about this matter.

Sincerely,

/s/Cronan O'Connell

Attachments

cc: Julie Veach (via e-mail at [Julie.Veach@fcc.gov](mailto:Julie.Veach@fcc.gov))  
Jeremy Miller (via e-mail at [Jeremy.Miller@fcc.gov](mailto:Jeremy.Miller@fcc.gov))  
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**TRIENNIAL REVIEW REMAND ORDER**  
**QWEST WIRE CENTER CLASSIFICATION FOR DEDICATED TRANSPORT**  
Sorted by Wire Center Classification

<b>State</b>	<b>Wire Center Name</b>	<b>CLLID</b>	<b>Wire Center Classification</b>
AZ	PHOENIX EAST	PHNXAZEA	Tier 1
AZ	PHOENIX MAIN	PHNXAZMA	Tier 1
AZ	PHOENIX NORTHEAST	PHNXAZNE	Tier 1
AZ	PHOENIX NORTH	PHNXAZNO	Tier 1
AZ	THUNDERBIRD	SCDLAZTH	Tier 1
AZ	TEMPE	TEMPAZMA	Tier 1
AZ	MCCLINTOCK	TEMPAZMC	Tier 1
CO	BOULDER	BLDRCOMA	Tier 1
CO	COLO SPRINGS MAIN	CLSPCOMA	Tier 1
CO	PIKEVIEW	CLSPCOPV	Tier 1
CO	CAPITOL HILL	DNVRCOCH	Tier 1
CO	CURTIS PARK	DNVRCOCP	Tier 1
CO	DRY CREEK	DNVRCODC	Tier 1
CO	DENVER EAST	DNVRCOEA	Tier 1
CO	DENVER MAIN	DNVRCOMA	Tier 1
CO	DENVER SOUTHEAST	DNVRCOSE	Tier 1
CO	SULLIVAN	DNVRCOSL	Tier 1
CO	NORTHGLENN	NGLNCOMA	Tier 1
IA	DES MOINES DOWNTOWN	DESMIADT	Tier 1
ID	BOISE MAIN	BOISIDMA	Tier 1
MN	NORMANDALE	BLTNMNO	Tier 1
MN	ORCHARD	GLVYMNOR	Tier 1
MN	MPLS DOWNTOWN	MPLSMNDT	Tier 1
MN	MARKET	STPLMNMK	Tier 1
NE	OMAHA DOUGLAS	OMAHNENW	Tier 1
NM	ALBQ MAIN	ALBQNMA	Tier 1
OR	EUGENE 10TH AVE	EUGNOR53	Tier 1
OR	MEDFORD	MDFDOR33	Tier 1
OR	PTLD BELMONT	PTLDOR13	Tier 1
OR	PTLD CAPITOL	PTLDOR69	Tier 1
OR	SALEM STATE(MAIN)	SALMOR58	Tier 1
UT	MURRAY	MRRYUTMA	Tier 1
UT	OGDEN MAIN	OGDNUTMA	Tier 1
UT	PROVO	PROVUTMA	Tier 1
UT	SLKC MAIN	SLKCUTMA	Tier 1
UT	SLKC SOUTH	SLKCUTSO	Tier 1
UT	SLKC WEST	SLKCUTWE	Tier 1
WA	BELLEVUE SHERWOOD	BLLVWASH	Tier 1
WA	KENT O BRIEN	KENTWAOB	Tier 1
WA	OLYMPIA WHITEHALL	OLYMWA02	Tier 1
WA	SPOKANE RIVERSIDE	SPKNWA01	Tier 1
WA	SEATTLE EAST	STTLWA03	Tier 1
WA	SEATTLE ATWATER	STTLWA05	Tier 1
WA	SEATTLE MAIN	STTLWA06	Tier 1
WA	SEATTLE CAMPUS	STTLWACA	Tier 1
WA	SEATTLE ELLIOTT	STTLWAEI	Tier 1
AZ	MESA	MESAAZMA	Tier 2
AZ	SCOTTSDALE MAIN	SCDLAZMA	Tier 2
AZ	TUCSON MAIN	TCSNAZMA	Tier 2
CO	ARVADA	ARVDCOMA	Tier 2
CO	AURORA	AURRCOMA	Tier 2
CO	DENVER SOUTH	DNVRCOSO	Tier 2
CO	ABERDEEN	ENWDCOAB	Tier 2
CO	LAKWOOD	LKWDCOMA	Tier 2
IA	CEDAR RAPIDS DOWNTOWN	CDRRIADT	Tier 2
ID	BOISE WEST	BOISIDWE	Tier 2
MN	SOUTH	BLTNMNSO	Tier 2
MN	CRYSTAL	CRYSMNCR	Tier 2
MN	EAGAN-LEXINGTON	EAGNMNLB	Tier 2
MN	EDEN PRAIRIE	EDPRMNEP	Tier 2
MN	MPLS 7TH AVE	MPLSMN07	Tier 2
MN	MAPLEWOOD	MPWDMNMA	Tier 2
MN	OWATONNA	OWTNMNOW	Tier 2
MN	ROCHESTER	ROCHMNRO	Tier 2
MN	ST CLOUD	STCDMNTO	Tier 2
ND	FARGO-MOORHEAD	FARGNDBC	Tier 2
NE	OMAHA 84TH ST	OMAHNE84	Tier 2
NE	OMAHA 90TH ST	OMAHNE90	Tier 2
NM	SAN MATEO	ALBQNMSM	Tier 2
OR	BEND	BENDOR24	Tier 2

**TRIENNIAL REVIEW REMAND ORDER**  
**QWEST WIRE CENTER CLASSIFICATION FOR DEDICATED TRANSPORT**  
Sorted by Wire Center Classification

<b>State</b>	<b>Wire Center Name</b>	<b>CLLID</b>	<b>Wire Center Classification</b>
OR	VALE	VALEORXC	Tier 3
OR	VENETA	VENTOR54	Tier 3
OR	WOODBURN	WDBNOR59	Tier 3
OR	WINSTON	WNTNOR57	Tier 3
OR	WARM SPRINGS	WRSPOR52	Tier 3
OR	WARRENTON	WRTNOR64	Tier 3
OR	WESTPORT	WSPTOR64	Tier 3
SD	ABERDEEN	ABRDSDCO	Tier 3
SD	ARLINGTON	ARTNSDCO	Tier 3
SD	BELLE FOURCHE	BLFRSDCO	Tier 3
SD	BLACKHAWK	BLHKSDCE	Tier 3
SD	CAVOUR	CAVRSDCO	Tier 3
SD	CHAMBERLAIN	CHBLSDCO	Tier 3
SD	COLMAN	CLMNSDCO	Tier 3
SD	CANTON	CNTNSDCO	Tier 3
SD	DEADWOOD	DDWSDCO	Tier 3
SD	DESMET	DEMSDCO	Tier 3
SD	ELK POINT	ELPNSDCO	Tier 3
SD	FLANDREAU	FLNDSDCO	Tier 3
SD	FT PIERRE	FTPRSDCE	Tier 3
SD	HILL CITY	HLCYSDCO	Tier 3
SD	HARRISBURG	HRBGSDCO	Tier 3
SD	HURON	HURNSDCO	Tier 3
SD	IROQUOIS	IRQSSDCO	Tier 3
SD	LEAD	LEADSDCO	Tier 3
SD	LAKE PRESTON	LKPRSDCO	Tier 3
SD	MCINTOSH	MCINSDCO	Tier 3
SD	MADISON	MDSNSDCE	Tier 3
SD	MILBANK	MLBNSDCO	Tier 3
SD	MILLER	MLLRSDCO	Tier 3
SD	MORRISTOWN	MRTWSDCO	Tier 3
SD	MITCHELL	MTCHSDCO	Tier 3
SD	PIERRE	PIRRSDCO	Tier 3
SD	REDFIELD	RDFSDCO	Tier 3
SD	RAPID CITY	RPCYSDCO	Tier 3
SD	RAPID VALLEY	RPVYSDCO	Tier 3
SD	SPEARFISH	SPRFSDCO	Tier 3
SD	STURGIS	STRGSDCO	Tier 3
SD	SIoux FALLS SOUTHEAS	SXFLSDSE	Tier 3
SD	SIoux FALLS SOUTHWE	SXFLSDSW	Tier 3
SD	TEA	TEA-SDCO	Tier 3
SD	TIMBER LAKE	TMLKSDCO	Tier 3
SD	VOLGA	VOLGSDCO	Tier 3
SD	VERMILLION	VRMLSDCO	Tier 3
SD	WHITEWOOD	WHWSDCO	Tier 3
SD	WARWICK	WRWKSDCO	Tier 3
SD	WATERTOWN	WTTWSDCO	Tier 3
SD	YANKTON	YNTNSDCO	Tier 3
UT	ALTA	ALTAUTMA	Tier 3
UT	AMERICAN FORK	AMFKUTMA	Tier 3
UT	BEAVER	BEVRUTMA	Tier 3
UT	BRIGHAM CITY	BGCYUTMA	Tier 3
UT	BRIANHEAD	BNHDUTMA	Tier 3
UT	BOUNTIFUL	BNTFUTMA	Tier 3
UT	CEDAR CITY	CDCYUTMA	Tier 3
UT	CLEARFIELD	CLFDUTMA	Tier 3
UT	CORINNE	CRNNUTMA	Tier 3
UT	COTTONWOOD	CTWDUTMA	Tier 3
UT	DRAPER	DRPRUTMA	Tier 3
UT	FARMINGTON	FRTNUTMA	Tier 3
UT	GRANTSVILLE	GTVLUTMA	Tier 3
UT	HEBER CITY	HBCYUTMA	Tier 3
UT	HOLLADAY	HLDYUTMA	Tier 3
UT	HUNTSVILLE	HNVIUTMA	Tier 3
UT	HURRICANE	HRCNUTMA	Tier 3
UT	HYRUM	HYRMUTMA	Tier 3
UT	KEARNS	KRNSUTMA	Tier 3
UT	KAYSVILLE	KYVLUTMA	Tier 3
UT	LEEDS	LEDSUTMA	Tier 3
UT	LEHI	LEHIUTMA	Tier 3

**TRIENNIAL REVIEW REMAND ORDER**  
**QWEST WIRE CENTER CLASSIFICATION FOR DEDICATED TRANSPORT**  
Sorted by Wire Center Classification

<b>State</b>	<b>Wire Center Name</b>	<b>CLLID</b>	<b>Wire Center Classification</b>
UT	LOGAN	LOGNUTMA	Tier 3
UT	LAYTON EAST	LYTNUTMA	Tier 3
UT	MAGNA	MAGNUTNM	Tier 3
UT	MIDVALE	MDVAUTMA	Tier 3
UT	MONROE	MONRUTMA	Tier 3
UT	MORGAN	MRGNUTMA	Tier 3
UT	MOUNTAIN GREEN	MTGNUTMA	Tier 3
UT	NEPHI	NEPHUTMA	Tier 3
UT	OGDEN NORTH	OGDNUTNO	Tier 3
UT	OGDEN SOUTH	OGDNUTSO	Tier 3
UT	OGDEN WEST	OGDNUTWE	Tier 3
UT	OREM	OREMUTMA	Tier 3
UT	PLEASANT GROVE	PLGVUTMA	Tier 3
UT	PARK CITY	PRCYUTMA	Tier 3
UT	PAROWAN	PRWNUTMA	Tier 3
UT	PAYSON	PYSNUTMA	Tier 3
UT	RICHFIELD	RCFDUTMA	Tier 3
UT	RICHMOND	RCMDUTMA	Tier 3
UT	RIVERTON	RVTNUTMA	Tier 3
UT	SALEM	SALMUTMA	Tier 3
UT	SALINA	SALNUTMA	Tier 3
UT	SLKC EAST	SLKCTEA	Tier 3
UT	SMITHFIELD	SMFDUTMA	Tier 3
UT	SANTAQUIN	SNTQUTMA	Tier 3
UT	SPRINGDALE	SPDLUTMA	Tier 3
UT	SPANISH FORK	SPFKUTMA	Tier 3
UT	SPRINGVILLE	SPVLUTMA	Tier 3
UT	ST GEORGE	STGRUTMA	Tier 3
UT	TOOELE	TOOLUTMA	Tier 3
UT	VEYO	VEYQUTMA	Tier 3
UT	WASHINGTON	WASHUTMA	Tier 3
UT	WEST JORDAN	WJRDUTMA	Tier 3
WA	ABERDEEN	ABRDWA01	Tier 3
WA	AUBURN	AUBNWA01	Tier 3
WA	BUCKLEY	BCKLWA01	Tier 3
WA	BLACK DIAMOND	BDMDWA01	Tier 3
WA	BELFAIR	BLFRWA01	Tier 3
WA	BELLINGHAM REGENT	BLHMWA01	Tier 3
WA	BELLINGHAM LUMMI	BLHMWALU	Tier 3
WA	BREMERTON ESSEX	BMTNWA01	Tier 3
WA	BAINBRIDGE ISLAND	BNISWA01	Tier 3
WA	BATTLEGROUND	BTLGWA01	Tier 3
WA	BONNEY LAKE	BYLKWA01	Tier 3
WA	CENTRALIA	CENLWA01	Tier 3
WA	CHEHALIS	CHHLWA01	Tier 3
WA	COULEE DAM	CLDMWA01	Tier 3
WA	CLE ELUM	CLELWA01	Tier 3
WA	COLFAX	CLFXWA01	Tier 3
WA	COLVILLE	CLVLWA01	Tier 3
WA	COLBY	COLBWA01	Tier 3
WA	CRYSTAL MOUNTAIN	CRMTWA01	Tier 3
WA	CROSBY	CRSBWA01	Tier 3
WA	CASTLE ROCK	CSRKWA01	Tier 3
WA	DES MOINES-TA-TR	DESMWA01	Tier 3
WA	DEER PARK	DRPKWA01	Tier 3
WA	DAYTON	DYTNWA01	Tier 3
WA	ELK	ELK-WA01	Tier 3
WA	ENUMCLAW	ENMCWA01	Tier 3
WA	EPHRATA	EPHRWA01	Tier 3
WA	EASTON	ESTNWA01	Tier 3
WA	FEDERAL WAY	FDWYWA01	Tier 3
WA	GREEN BLUFF	GRBLWA01	Tier 3
WA	GRAHAM	GRHMWAGR	Tier 3
WA	HOODSPORT	HDPTWA01	Tier 3
WA	ISSAQUAH	ISQHWAEX	Tier 3
WA	JOYCE	JOYCWA01	Tier 3
WA	KENT ULRICK	KENTWA01	Tier 3
WA	KENT MERIDIAN	KENTWAME	Tier 3
WA	LACEY	LACYWA01	Tier 3
WA	LIBERTY LAKE	LBLKWA01	Tier 3

**TRIENNIAL REVIEW REMAND ORDER**  
 QWEST WIRE CENTERS THAT SATISFY THE NONIMPAIRMENT STANDARDS FOR DS1 AND DS3 LOOPS  
 SORTED BY LOOP TYPE

State	Wire Center Name	CIIB	No Impairment for the following:
AZ	TEMPE	TEMPAZMA	DS3 loops
AZ	PHOENIX NORTH	PHNXAZNO	DS3 loops
AZ	PHOENIX MAIN	PHNXAZMA	DS3 loops
CO	DENVER MAIN	DNVRCOMA	DS3 loops
CO	DRY CREEK	DNVRCODC	DS3 loops
ID	BOISE MAIN	BOISIDMA	DS3 loops
MN	MARKET	STPLMNMK	DS3 loops
MN	MPLS DOWNTOWN	MPLSMNDT	DS1 & DS3 loops
OR	PTLD CAPITOL	PTLDOR69	DS1 & DS3 loops
UT	SLKC MAIN	SLKCUTMA	DS1 & DS3 loops
WA	SEATTLE MAIN	STTLWA06	DS1 & DS3 loops