

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Investigation into) Docket No. 06-049-40
Qwest Wire Center Data)
)
)

DIRECT TESTIMONY OF
OF
RACHEL TORRENCE
FOR
QWEST CORPORATION

MARCH 24, 2006

TABLE OF CONTENTS

	Page
EXECUTIVE SUMMARY	i
I. IDENTIFICATION OF WITNESS	1
II. PURPOSE OF DIRECT TESTIMONY	4
III. THE TRIENNIAL REVIEW REMAND ORDER SPECIFICALLY DEFINED WHAT CONSTITUTES A FIBER-BASED COLLOCATOR.....	6
IV. QWEST’S PROCESS FOR IDENTIFYING FIBER-BASED COLLOCATORS WAS BASED ON A LITERAL READING OF THE PARAMETERS SET FORTH IN THE <i>TRRO</i>.	9
V. QWEST FILED A REVISED LIST OF UNIMPAIRED WIRE CENTERS WITH THE FCC THAT REFLECTED A COMPREHENSIVE AND ACCURATE REVIEW OF FIBER-BASED COLLOCATORS.....	17
VI. SUMMARY OF TESTIMONY	21
VII. CONCLUSION	23

EXECUTIVE SUMMARY

The FCC's Triennial Review Remand Order ("*TRRO*") established new rules applicable to Incumbent Local Exchange Carriers ("ILECs") regarding their unbundling obligations for high-capacity loops and dedicated interoffice transport,¹ and laid down a clear methodology by which an ILEC could identify wire centers where Competitive Local Exchange Carriers ("CLECs") would not be impaired without the availability of these unbundled network elements ("UNEs"). Qwest filed a list of its non-impaired wire centers in Utah. In this proceeding, Qwest is seeking to have the Commission confirm through application of criteria in the *TRRO* that the data used to develop the list of non-impaired wire centers support Qwest's determinations of non-impairment. The wire centers on the list were identified using appropriate methodologies and processes, consistent with the *TRRO*. This testimony details the efforts that Qwest has undertaken in identifying fiber-based collocators within Utah wire centers, one of two determinative factors in satisfying the identification of non-impaired wire centers.

¹ Unbundling obligations for mass market local circuit switching were also addressed, but are not included in this proceeding.

1 **I. IDENTIFICATION OF WITNESS**

2
3 **Q. PLEASE STATE YOUR NAME, BUSINESS ADDRESS AND POSITION WITH**
4 **QWEST CORPORATION.**

5 A. My name is Rachel Torrence. My business address is 700 W. Mineral Ave., Littleton
6 Colorado. I am employed as a Director within the Network Policy Group of Qwest
7 Services Corporation, parent company of Qwest Corporation. I am testifying on behalf
8 of Qwest Corporation ("Qwest").

9
10 **Q. PLEASE DESCRIBE YOUR WORK EXPERIENCE, TECHNICAL TRAINING,**
11 **AND PRESENT RESPONSIBILITIES.**

12 A. I have been employed in the telecommunications industry for more than 32 years. I
13 began my career in 1973 and have worked my entire career for Qwest and its
14 predecessors, The Mountain States Telephone and Telegraph Company ("Mountain
15 Bell"), and US WEST Communications, Inc. For the major part of my career, I have
16 been employed in Network operations in these companies; within Qwest that
17 organization is known as the Local Network Organization. As an employee of the Local
18 Network Organization, I have held engineering positions in the Long Range Planning,
19 Capacity Provisioning and Tactical Planning organizations and have had responsibility
20 for projects that focuses on ensuring network efficiency and maintaining adequate levels
21 of network capacity. My years in the Local Network Organization have provided me
22 with an extensive telecommunications background and much in-depth experience with
23 virtually all aspects of the public switched telephone network ("PSTN").

1 In 1997, I accepted a position within the Technical, Regulatory and Interconnection
2 Planning Group. My responsibilities as a member of an Interconnection Negotiations
3 Team included maintaining the network integrity of the PSTN and ensuring the technical
4 feasibility of various interconnection arrangements between Qwest and wireline and
5 wireless co-providers, with an emphasis on emerging technologies.

6 In 2001, I accepted my current position as a Director within the Technical and Regulatory
7 Group, now known as Network Policy, where I am responsible for ensuring compliance
8 with the 1996 Telecommunications Act, other federal regulations and state regulations.
9 My responsibilities include, but are not limited to, providing litigation support in
10 proceedings before the Federal Communications Commission ("FCC") and state
11 commissions on issues relating to the network elements and architectures used in both
12 wireline and wireless networks. In addition, I represent Qwest on the Network
13 Reliability and Interoperability Council ("NRIC"), a body created by the FCC, and on
14 committees addressing the reliability and interoperability of wireline networks, wireless
15 networks and emerging cyber-networks. I currently serve on an NRIC committee
16 addressing commercial communications applications for Public Safety as part of federal
17 Homeland Security.

18
19 **Q. WHAT IS YOUR EDUCATIONAL BACKGROUND?**

20 A. I attended the University of Arizona, Chapman University and Pima Community College
21 where I studied Electronic Engineering, Management Theory, and Behavioral Science.

22 In addition, I have more than 3200 hours of continuing education in the

1 telecommunications field and I hold various telecommunications certifications in both
2 wireline and wireless disciplines.

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II. PURPOSE OF DIRECT TESTIMONY

Q. WHAT IS THE PURPOSE OF YOUR DIRECT TESTIMONY?

A. Responding to the remand and vacatur by the D.C. Circuit (“*USTA II*”) of certain portions of the FCC's *Triennial Review Order* (“*TRO*”),² on February 4, 2005, the FCC released its Order on Remand (“*TRRO*”) in the Triennial Review of the unbundled network elements (“*UNEs*”) to which incumbent LECs are required to provide access to competitors at “cost-based” (*i.e.*, Total Element Long Run Incremental Cost, or “*TELRIC*”) rates. In particular, the *TRRO* established new rules applicable to Incumbent Local Exchange Carrier (“*ILEC*”) unbundling obligations regarding high-capacity loops and dedicated inter-office transport. The *TRRO* was effective March 11, 2005. Based on the rule changes brought about by the *TRRO*, Qwest submitted a filing to the FCC on February 18, 2005, and a modification of that list on July 8, 2005, that identified the wire centers in Utah and other states in which Qwest no longer has an obligation to provide high-capacity loops and dedicated inter-office transport as *UNEs*. In this proceeding, Qwest is seeking to have the Commission confirm through application of criteria in the *TRRO* that the data used to develop the list of non-impaired wire centers support Qwest's determinations of non-impairment.

In compiling a list of its wire centers no longer subject to unbundling obligations, Qwest relied on the two determinative factors that the FCC established in the *TRRO* for

² See *United States Telecom Ass'n v. FCC*, 359 F.3d 554 (D.C. Cir. 2004), *vacating and remanding in part, affirming in part*, Review of the Section 251 Unbundling Obligations of Incumbent LECs, 18 FCC Rcd. 16978 (2003).

1 evaluating impairment in wire centers: (1) the number of business lines in a wire center,
2 and (2) the number of fiber-based collocators in a wire center.

3 As such, the purpose of my direct testimony is two-fold. First, as evidence of the validity
4 and accuracy of the list, I describe the process that Qwest undertook when identifying
5 fiber-based collocators within its Utah wire centers. I explain how Qwest took the FCC's
6 very specific criteria for defining a fiber-based collocator and applied those exact criteria
7 in assessing the number of fiber-based collocators within its Utah wire centers. Second,
8 my testimony presents the list of fiber-based collocators within Qwest's Utah wire
9 centers.

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1 **III. THE TRIENNIAL REVIEW REMAND ORDER SPECIFICALLY DEFINED**
2 **WHAT CONSTITUTES A FIBER-BASED COLLOCATOR.**

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4
5 **Q. PLEASE EXPLAIN IN GREATER DETAIL THE FRAMEWORK UNDER**
6 **WHICH CLECs ARE NO LONGER DEEMED IMPAIRED, AND HOW THE**
7 **NUMBER OF FIBER-BASED COLLOCATORS IS A CRITICAL FACTOR IN**
8 **MAKING A DETERMINATION OF NON-IMPAIRMENT.**

9 A. In her direct testimony, Ms. Renee Albersheim of Qwest gives a broad general summary
10 of both the *TRO* and the *TRRO*. In addition, the following summary gives a clear and
11 concise view of how the number of fiber-based collocators is a critical element of the
12 non-impairment tests set forth in the *TRRO*.

13 **DS1 Transport**

- 14 • DS1 Transport Unbundling Test. Unbundling of DS1 inter-office
15 transport is required on all routes except those connecting two wire
16 centers with ***four or more fiber-based collocations, or 38,000 or more***
17 ***business lines (i.e., “Tier 1” wire centers).***³

18
19 **DS3 / Dark Fiber Transport**

- 20 • DS3 / Dark Fiber Transport Unbundling Test. Unbundling of DS3 and
21 dark fiber inter-office transport is required on all routes except those
22 connecting wire centers where both of the wire centers contain ***three or***
23 ***more fiber-based collocations, or 24,000 or more business lines (i.e.,***
24 ***“Tier 1” or “Tier 2” wire centers).***

25
26 **DS1 Loops**

- 27 • Available as UNEs except in wire centers with 60,000 or more business
28 lines and ***four or more fiber-based collocations.***

29
30

³ While defined in more detail in Ms. Albersheim’s testimony, depending on the level of competitive presence in a given wire-center, a wire center will be ranked in one of three tiers. “Tier 1” wire centers serve a minimum of 38,000 business lines or contain a minimum of four fiber-based collocators in the wire center. “Tier 2” wire centers serve 24,000 business lines or contain a minimum of three fiber based collocators in the wire center. Wire centers not meeting Tier 1 or 2 parameters are ranked as “Tier 3” wire centers.

1 **DS3 Loops**

- 2 • Available as UNEs except in wire centers with at least 38,000 business
3 lines and *four or more fiber-based collocators*.
4

5 Simply put, the number of fiber-based collocators and the number of business lines are
6 the two determining factors in the FCC's tests for wire center impairment. Exhibit RA-3,
7 attached to Ms. Albersheim's direct testimony, is a simplified graphic illustration of the
8 impairment tests.
9

10 **Q. HOW DID THE TRRO DEFINE A "FIBER-BASED COLLOCATOR" FOR**
11 **PURPOSES OF DETERMINING NON-IMPAIRMENT?**

12 A. The TRRO was quite specific in defining what constituted a "fiber-based collocator." It
13 defined a fiber-based collocator as any carrier, unaffiliated with the incumbent LEC, that
14 maintains a collocation arrangement in an incumbent LEC wire center, with active
15 electrical power supply, and that operates a fiber-optic cable or comparable transmission
16 facility that (1) terminates at a collocation arrangement within the wire center; (2) leaves
17 the incumbent LEC wire center premises; and (3) is owned by a party other than the
18 incumbent LEC or any affiliate of the incumbent LEC. (TRRO, ¶ 102.) Dark fiber
19 obtained from an incumbent LEC on an indefeasible right of use ("IRU") basis is treated
20 as non-incumbent LEC fiber-optic cable. (TRRO, ¶ 102, fn. 292.) Two or more affiliated
21 fiber-based collocators in a single wire center are collectively counted as a single fiber-
22 based collocator. (TRRO, ¶ 102; see also 47 CFR § 51.5 ("Rule 51.5").) Fixed-wireless
23 collocation arrangements are included "if the carrier's alternative transmission facilities
24 both terminate in and leave the wire center." (TRRO, ¶ 102.) Finally, a competitor's

1 collocation arrangement counts toward the qualification of a wire center for a particular
2 tier irrespective of the services that the competing carrier offers. (*Id.*)
3

4 **Q. YOU TESTIFIED THAT THE OTHER ELEMENT CRITICAL TO THE**
5 **IMPAIRMENT TEST IS THE NUMBER OF BUSINESS LINES. HOW DID THE**
6 **TRRO DEFINE “BUSINESS LINES” FOR PURPOSES OF DETERMINING NON-**
7 **IMPAIRMENT?**

8 A. In his direct testimony, Mr. David Teitzel of Qwest discusses how business lines were
9 defined in the *TRRO*. Furthermore, his testimony details how Qwest compiled the data it
10 presented to the FCC when identifying which of its wire centers would no longer be
11 subject to unbundling requirements when provisioning dedicated inter-office transport
12 and high-capacity loops.
13
14
15

1 **IV. QWEST'S PROCESS FOR IDENTIFYING FIBER-BASED COLLOCATORS**
2 **WAS BASED ON A LITERAL READING OF THE PARAMETERS SET FORTH**
3 **IN THE *TRRO*.**

4
5 **Q. HOW DID QWEST IDENTIFY THE NUMBER OF FIBER-BASED**
6 **COLLOCATORS WITHIN ITS UTAH WIRE CENTERS?**

7 A. Qwest took the criteria set forth in the *TRRO* for determining a fiber-based collocator,
8 and adopted the *TRRO*'s definition for fiber-based collocators verbatim. (*TRRO*, ¶ 102.)
9 As such, the criteria that Qwest used in identifying fiber-based collocators within its wire
10 centers were:

- 11 a. having a collocation.
12 b. the collocation is being served by an active power supply.
13 c. the collocation operating a fiber-optic cable or comparable transmission facility
14 that:
15 (1) terminates at a collocation arrangement within the wire center;
16 (2) leaves the incumbent LEC's wire center premises; and
17 (3) is owned by a party other than the incumbent LEC or any affiliate of the
18 incumbent LEC.
19 d. in instances where two or more affiliated fiber-based collocators, or a single
20 collocator, had multiple collocations in a single wire center, they were collectively
21 counted as a single-fiber-based collocator.
22

23 Exhibit RT-1 is a graphic depiction of typical collocation architectures depicting each of
24 the elements identified above.

25
26 **Q. THE *TRRO* ALSO SET CRITERIA REGARDING DARK FIBER USERS AND**
27 **FIXED-WIRELESS PROVIDERS AS FIBER-BASED COLLOCATORS. WHY**
28 **ARE THEY NOT ADDRESSED IN QWEST'S CRITERIA AS OUTLINED**
29 **ABOVE?**

1 A. When Qwest undertook its efforts to identify fiber-based collocators as defined by the
2 *TRRO*, Qwest decided not to include fixed-wireless providers and dark fiber users in
3 counts of fiber collocators. Qwest took a very conservative approach for the sake of
4 increased accuracy, and thus focused its attention on the majority of qualifying
5 collocators, which were fiber-based collocators. Qualifying fixed wireless and dark fiber
6 users operating with an IRU constitute a very small percentage of the total numbers of
7 collocators, and thus identifying and verifying these types of collocators would have
8 required an extensive research effort. Given the short timeframe within which Qwest had
9 to accomplish its task, it seemed a more prudent approach to concentrate on compiling an
10 accurate list of the types of fiber-based collocators that constitute the vast majority of
11 fiber-based collocators within Qwest's Utah wire centers.

12
13 **Q. DESCRIBE THE PROCESS THAT QWEST UNDERTOOK IN IDENTIFYING**
14 **THE NUMBER OF FIBER-BASED COLLOCATORS IN UTAH.**

15 A. Qwest undertook two distinct efforts in identifying the number of fiber-based collocators
16 within its wire centers not only in Utah, but in all other states within its serving territory.
17 Qwest's initial effort used its collocation tracking records and billing data as a baseline
18 which coincided with the December 2003 ARMIS data, as Mr. Teitzel describes. The
19 second effort, which was a comprehensive validation of the data compiled during the
20 initial effort, incorporated CLEC responses to Qwest's requests for confirmation of data
21 and actual field verifications of wire centers.

22 **Q. PLEASE DETAIL THE INITIAL EFFORT WHICH RESULTED IN THE FIRST**
23 **FILING WITH THE FCC.**

1
2 A. For the initial effort, Qwest used an internal database that tracks all CLEC-submitted and
3 approved collocation requests in order to develop a list of fiber collocations. This list
4 was then edited to extract all collocations that did not have a record indicator for fiber
5 entrance facilities (as this would be an indicator that the fiber was not provided by Qwest
6 or one of its affiliates). After edits were completed, the resulting list was sent to Qwest's
7 Collocation Project Management Center for verification that there was active power in
8 those collocations. That center verified the presence of active power through records
9 indicating billing for power usage. Next, Qwest's Wholesale Markets team validated the
10 list against February 2005 billing data, providing confirmation that the carrier was indeed
11 being billed for collocation.

12 The resulting list was further verified by Qwest Central Office Technicians and State
13 Interconnection Managers. As I have previously stated, because of the relatively short
14 timeframe before a final determination of the number collocators was to be filed with the
15 FCC, Qwest chose to take a conservative and comprehensive approach that would yield a
16 smaller but more accurate result. When network field personnel were unable to confirm a
17 particular collocation, based on their records or personal knowledge of their particular
18 wire centers, Qwest did not include that collocation in its initial February 2005 list.

19 (Given the limited time that Qwest had between receipt of the FCC's request for the wire
20 center list and the date that the list was to be submitted to the FCC, questionable
21 collocations could not be verified, and as such were not included.)

1 Finally, Qwest analyzed the resulting list to ensure that multiple collocations at a single
2 wire center by the same or affiliated carriers, or multiple collocations by a single carrier,
3 were counted as only one fiber-based collocator. The number of fiber-based collocators
4 in any given wire center was counted as of the date of the *TRRO*'s release, February
5 2005. The resulting list was filed with the FCC on February 18, 2005.

6
7 As further verification of the accuracy of its initial list, on March 29, 2005, Qwest sent a
8 letter to each CLEC advising them of the wire centers in which Qwest showed the CLEC
9 to have a fiber-based collocation as reflected by the data on the initial list. In that March
10 29, 2005 letter, Qwest requested that the CLEC make sure its records agreed with
11 Qwest's records and, if there was a discrepancy, that the CLEC provide documentation to
12 Qwest regarding the collocation in question. Qwest requested that any such
13 documentation be provided by April 12, 2005.

14
15 **Q. DID ANY CLECs RESPOND TO THE REQUESTS FOR VALIDATION OF**
16 **THEIR FIBER-BASED COLLOCATION DATA IN UTAH?**

17 A. Yes. Two fiber-based collocators operating in Utah responded to the letter that Qwest
18 sent asking for validation of their fiber-based collocation data. After the field
19 verification, two collocations (in Murray and Ogden) for one of the responding
20 collocators were removed. I discuss these mis-designated collocations later in Section V
21 of my testimony. The second carrier's collocation dispute was resolved after the field
22 verification confirmed that the carrier indeed had a fiber-based collocation that met the

1 criteria set forth by the *TRRO*, and the carrier was informed. Thus, this fiber-based
2 collocator remained on the list.

3
4 **Q. WHY DID QWEST BELIEVE IT WAS NECESSARY TO UNDERTAKE A**
5 **SECOND EFFORT TO VALIDATE THE LIST OF NON-IMPAIRED WIRE**
6 **CENTERS?**

7 A. While Qwest was relatively confident in the accuracy of the initial list of non-impaired
8 wire centers, it recognized that because of its conservative approach, the list might not
9 necessarily be complete. In taking the approach that it did, Qwest recognized there was
10 potential for undercounting the number of collocators. For example, the possibility of
11 mergers and acquisitions that had not been properly communicated by CLECs to Qwest
12 created potential for mis-counting. Therefore, if there was any question as to whether or
13 not two given carriers were affiliated, the carriers were counted as one collocator, rather
14 than two. Furthermore, the databases that Qwest used as a source to identify fiber-based
15 collocations were designed for a much different purpose, and thus included all types of
16 collocation. Qwest was now reviewing these databases for much more specific
17 information and types of collocation that would not necessarily have been included in the
18 records. Again, however, if there was any question as to whether a collocator met the
19 FCC's definition of a fiber-based collocator, Qwest did *not* include the carrier in the
20 count of collocators. Finally, responses to the letters that Qwest sent to collocating
21 CLECs indicated that changes to the initial list might be necessary.

1 **Q. DESCRIBE THE SECOND EFFORT WHICH RESULTED IN QWEST RE-**
2 **FILING ITS WIRE CENTER LIST WITH THE FCC.**

3 A. As previously stated, Qwest recognized that while its initial list was accurate, it was not
4 necessarily complete. Again, Qwest looked to the language of the *TRRO* for direction in
5 compiling a more comprehensive list of fiber-based collocators operating in Utah. The
6 tier determinations as filed with the FCC were used as a baseline. Lists of Tier 1 and Tier
7 2 fiber-based collocations were sorted by wire center. For each wire center, all identified
8 collocations were entered into a template spreadsheet. The purpose of the spreadsheet
9 was to facilitate the documentation of the following via field verifications:

- 10 a. Verification of Operator/Carrier Name. What name, if any, was stenciled on
11 the collocation space? If stenciled, did the name on the space match that of
12 the operator/carrier on record?
- 13 b. Verification of Power. Upon visual inspection, was there active power to the
14 collocation space? Were complete electrical circuits in place to Qwest power
15 systems? If possible, could billing be verified?
- 16 c. Verification of Fiber Facilities. Could fiber be visually verified? Was it an
17 express fiber⁴? Upon a visual inspection, did the fiber terminate on
18 equipment within the collocation space? Did the fiber leave the wire center
19 premises?

20 The parameters which were to be verified were taken directly from the criteria set forth in
21 the *TRRO* in defining a fiber-based collocation. The spreadsheet, as sent to Qwest's field

⁴ Express fiber is a CLEC provided fiber that is brought directly in to the collocation with no Qwest-provided entrance facility.

1 personnel, was populated with the fiber-based collocators that had been identified by the
2 initial effort. The physical verification of each wire center that was part of the second
3 effort not only verified the inclusion of the collocators identified in the initial effort, but
4 allowed for the verification of collocations that had not previously been included for
5 whatever reason. Exhibit RT-2 is a blank example of the template spreadsheet document.

6 During the first week of June 2005, Qwest sent the template spreadsheet document to its
7 Utah central office field personnel and such personnel were then directed to physically
8 inspect the identified wire centers and to (1) verify the information for the fiber-based
9 collocations identified and listed in the initial FCC filing, (2) add any fiber-based
10 collocations that met the criteria but that were not captured in the initial list, and to
11 document the criteria, (3) investigate disputes or data, if any, provided by CLECs in their
12 responses to Qwest's letter, and (4) provide any pertinent anecdotal information or
13 comments they may have had regarding any of the collocations.

14 Qwest then edited the initial list of fiber-based collocators to reflect the information
15 gathered through the physical field verifications. This verified list was used in
16 determining the list of Qwest non-impaired wire centers that Qwest filed with the FCC on
17 July 8, 2005.

18
19 **Q. WITH THE FIELD VERIFICATION HAVING BEEN COMPLETED IN JUNE**
20 **2005, COULD IT ASSUMED THAT THE FIBER-BASED COLLOCATIONS**
21 **WERE IN PLACE AS OF THE MARCH 11, 2005 DATE?**

1 A. Yes. Consistent with the fact that the effective date of the *TRRO*, March 11, 2005, was,
2 in fact, the effective date for removing unbundling obligations where non-impairment
3 criteria are met, Qwest's personnel in the field only included those collocations that met
4 the criteria as of the March 11, 2005 date. Such personnel did not include any
5 collocations that may have met the criteria after the March 11, 2005 date.

6

1 **V. QWEST FILED A REVISED LIST OF UNIMPAIRED WIRE CENTERS WITH**
2 **THE FCC THAT REFLECTED A COMPREHENSIVE AND ACCURATE**
3 **REVIEW OF FIBER-BASED COLLOCATORS.**
4
5

6 **Q. PLEASE PROVIDE THE LIST OF FIBER-BASED COLLOCATORS BY UTAH**
7 **WIRE CENTER THAT QWEST USED IN DEVELOPING THE LIST OF NON-**
8 **IMPAIRED WIRE CENTERS THAT IT RE-FILED WITH THE FCC ON JULY 8,**
9 **2005.**

10 A. Highly Confidential Exhibit RT-3 is the list of fiber-based collocators in Utah that Qwest
11 used in determining the final list of non-impaired wire centers in this state.
12

13 **Q HOW MANY UTAH WIRE CENTERS REQUIRED CHANGES IN THE**
14 **NUMBER OF FIBER-BASED COLLOCATORS AS A RESULT OF THE**
15 **REVIEW AND FIELD VERIFICATIONS?**

16 A. The review and field verifications led to changes in the total number of fiber-based
17 collocators in five wire centers in Utah. One additional Utah wire center had a change,
18 but without a net change in the number of fiber-based collocators in that wire center.
19 Finally, the changes resulting from the review and field verification led to tier re-
20 designations for three wire centers in Utah.
21

22 **Q. PLEASE IDENTIFY THE SIX UTAH WIRE CENTERS FOR WHICH THERE**
23 **WERE CHANGES IN THE NUMBER OF FIBER COLLOCATORS, AND**
24 **EXPLAIN THE REASONS FOR THE CHANGES IN BOTH THE NUMBER OF**

FIBER-BASED COLLOCATORS AND THE CHANGES IN TIER DESIGNATION.

A. Table 1 below summarizes the changes that resulted from the review and physical field verification of fiber-based collocators in Utah wire centers.

Table 1

Wire Center	Change in Number of Collocators	Change in Tier Designation
Murray	Dropped from 5 to 4 collocations as result of field verification confirming one collocator was mis-designated.	No change in Tier designation, remained Tier 1
Ogden	No net change in number of collocators; dropped by one collocator that had been mis-designated, and gained a collocator as result of field verification.	No change in Tier designation, remained Tier 1
Salt Lake Main	Field verification resulted in an increase of collocators from 7 to 8.	No change in Tier designation, remained Tier 1
Salt Lake South	Field verification resulted in an increase of collocators from 1 to 4.	Resulting change from Tier 3 to Tier 1
Salt Lake West	Field verification resulted in an increase of collocators from 2 to 6.	Resulting change from Tier 2 to Tier 1
Midvale	Field verification resulted in a decrease of collocators from 3 to 2.	Resulting change from Tier 2 to Tier 3

Highly Confidential Exhibit RT-4 details the CLECs involved and the specific mis-designations.

1 **Q. DOES THE FACT THAT QWEST MADE CHANGES TO THE NUMBER OF**
2 **FIBER-BASED COLLOCATORS IN SIX UTAH WIRE CENTERS REFLECT**
3 **UPON THE RELIABILITY OF QWEST'S DATA?**

4 A. No. As I have previously stated, in its initial compilation of data, Qwest took a very
5 conservative approach in listing the number of collocators. If there was any doubt as to
6 whether a collocator met the criteria, Qwest did not include the collocator. The increases
7 in the numbers of fiber-based collocators occurred only after comprehensive physical
8 field verifications had been conducted, leaving little, if any, room for doubt.
9 Furthermore, in the two instances where a collocator was mis-designated, it was a case of
10 Qwest identifying a period of time during which it was transitioning to a new database
11 tracking tool, and thus some data for collocations provisioned during that period may
12 have been erroneously categorized. Nonetheless, as a result of the initial reviews, all
13 collocations provisioned during that timeframe were reviewed a second time to ensure
14 accuracy. While the majority of the collocations that were reviewed a second time did
15 not require any modifications, the subsequent additional effort yielded a much more
16 accurate list of collocators across Utah.

17
18 **Q. DOES QWEST'S PROCESS FOR IDENTIFYING FIBER-BASED**
19 **COLLOCATORS SUBSTANTIATE ITS POSITION THAT THE LIST OF NON-**
20 **IMPAIRED UTAH WIRE CENTERS IS ACCURATE AND SHOULD BE**
21 **VALIDATED BY THE UTAH COMMISSION?**

22 A. Yes. Qwest took great pains to ensure that the number of fiber-based collocators in Utah
23 wire centers was accurately counted. Its process for identifying qualifying collocators

1 produced an accurate and verified count. This accurate and verified data on the number
2 of fiber-based collocators was one of two determinative factors in determining which
3 Utah wire centers were non-impaired. The resulting list of non-impaired Utah wire
4 centers, having relied on this accurate and verified data, is by extension just as accurate
5 and thus should be validated by this Commission.

6

7

8

1 **VI. SUMMARY OF TESTIMONY**

2
3 **Q. PLEASE PROVIDE A BRIEF SUMMARY OF YOUR TESTIMONY.**

4 A. Qwest is seeking to have the Commission confirm through application of criteria in the
5 *TRRO* that the data used to develop the list of non-impaired wire centers support Qwest's
6 determinations of non-impairment. Using the criteria set forth by the *TRRO*, Qwest made
7 extensive efforts to compile a comprehensive and accurate list of fiber-based collocators
8 within its Utah wire centers, one of the determining factors in identifying non-impaired
9 wire centers.

10 With that objective in mind, Qwest undertook two distinct efforts at identifying the
11 number of fiber-based collocators within in its wire centers not only in Utah, but in all
12 other states within its serving territory. In its first effort, Qwest's used its collocation
13 tracking records and billing data as a baseline. The second effort verified the accuracy of
14 the initial list and incorporated CLEC responses to Qwest's requests for confirmation of
15 data and actual field verifications of wire centers. For both the initial and second efforts,
16 Qwest applied a literal interpretation of the criteria set forth in the *TRRO* for determining
17 a fiber-based collocator, and thus adopted the *TRRO*'s criteria, verbatim, as the baseline
18 for its process for identifying fiber-based collocators with in its wire centers. The
19 resulting list of fiber-based collocators in Utah wire centers is accurate, comprehensive
20 and has been verified in numerous ways, including through tracking records, power
21 records and billing records and through physical inspections. Qwest made extensive
22 efforts to obtain an accurate inventory of the fiber-based collocators in Utah wire centers

1 based on the reasonably available information to which it had access. As such, Qwest's
2 counts of fiber-based collocators used to prepare the list of non-impaired Utah wire
3 centers should be validated by this Commission.

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VII. CONCLUSION

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3 **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

4 **A.** Yes it does. Thank you.

INDEX OF EXHIBITS

DESCRIPTION

EXHIBIT

Fiber-Based Collocation Architectures

Exhibit RT-1

Collocation Verification Worksheet

Exhibit RT-2

Fiber Jobs

Highly Confidential Exhibit RT-3

Table of Responding CLECs

Highly Confidential Exhibit RT-4