

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

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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. QWEST'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 A. 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,

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?**

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

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IV. SUMMARY OF TESTIMONY

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Q. PLEASE PROVIDE A BRIEF SUMMARY OF YOUR TESTIMONY.

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A. Qwest's methodology for determining the number of fiber-based collocators in the affected

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non-impaired Utah wire centers is sound and is objectively applied. This methodology

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yields an accurate list of non-impaired wire centers in the state of Utah. The listing of the

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wire centers appropriately shows those fiber based collocators as of the FCC's stated

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effective date of the TRRO Order (FCC 04-290) as March 11, 2005.

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IV. CONCLUSION

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Q. DOES THIS CONCLUDE YOUR TESTIMONY?

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A. Yes it does. Thank you.