



State of Utah
Department of Commerce
Division of Public Utilities

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Director, Division of Public Utilities

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July 30, 2008

TO: PUBLIC SERVICE COMMISSION

FROM: DIVISION OF PUBLIC UTILITIES

Philip J. Powlick, Director
Bill Duncan, Manager, Telecommunications
Casey J. Coleman, Technical Consultant

**Re: In the Matter of Qwest Corporation Petition for Commission Approval of
2008 Additions to Non-Impaired Wire Center List Docket No. 08-049-29**

RECOMMENDATION:

The Commission should grant Tier 2 status to the Draper exchange based on the number of lines

BACKGROUND:

On June 27, 2008, Qwest filed to have the Draper wire center classified as a Tier 2 exchange because it is above the 24,000 line threshold as outlined in the TRRO.

The Division also reviewed the line counts to ensure Qwest followed the methodology outlined by the Commission's order in Docket No. 06-049-40. In looking at the information provided, it appears that Qwest did follow the process of counting the number of lines as reported by ARMIS then adding any additional Voice Grade Equivalents for UNEs and EELs. Doing this review showed that the Draper wire center is above the 24,000 business line threshold for a Tier 2 designation.

CONCLUSION:

The Commission should grant Tier 2 status to the Draper exchange based on the number of lines.

CC: Alex Duarte, Qwest Corporation
Michael Ginsberg, Division of Public Utilities