

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

<p>In the Matter of QWEST CORPORATION</p> <p>Petition for Commission Approval of 2010 Additions to the Non-Impaired Wire Center List</p>	<p>Docket No. 10-049-22</p> <p>QWEST CORPORATION'S PETITION FOR COMMISSION APPROVAL OF 2010 ADDITIONS TO NON-IMPAIRED WIRE CENTER LIST AND MOTION FOR EXPEDITED ISSUANCE OF PROTECTIVE ORDER</p>
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AFFIDAVIT OF RACHEL TORRENCE

STATE OF COLORADO)
) ss.
COUNTY OF ARAPAHOE)

I, RACHEL TORRENCE, being first duly sworn, depose and state that:

1. My name is Rachel Torrence. I am employed by Qwest Corporation as a Director of Legal Issues supporting the Local Network Organization. My business address is 700 W. Mineral Avenue, Littleton, Colorado 80120.
2. Subsequent to and in adherence to terms of the "Multi-State Settlement Agreement Regarding Wire Center Designations and Related Issues" which was filed with this Commission on Friday, June 22, 2007 (here after referred to as the "Settlement Agreement"), Qwest filed a list of additional Non-Impaired Wire Centers on June 14, 2010 with the various state regulatory commissions including the Utah Public Service Commission. The Settlement Agreement was adopted by Utah Public Service Commission in Docket No. 06-049-40 on July 31, 2007.

3. In support of the filing, I conducted an inventory of Fiber-Based Collocators in Qwest Wire Centers to ascertain the number of fiber-based collocators in each wire center and the appropriate "Tier" designation. The Tier was subsequently used to establish Non-Impairment. Highly-Confidential Attachment A to this affidavit, "Collocations by Wire Center", details the Tier designation by wire center and details the number and identity of the fiber-based collocators in each wire center.
4. As part of that inventory, and as required under the terms of the Settlement Agreement, I conducted a physical field verification of the inventoried fiber-based collocators, and cross-referenced the physical inventory data with the corresponding order and construction records and billing data. The results of that physical field verification are contained in Highly Confidential Attachment B; "Collocation Verification Worksheets".
5. As necessary to validate the inventory data, I researched actual order records and engineering design and construction records to validate the physical configurations and the presence of an active power supply. Additionally, I researched and validated the Ready for Service ("RFS") dates which are also noted on Highly Confidential Attachment A; "Collocations by Wire Center".
6. I further researched the billing records for the collocation space and the active power supply to each collocation to ensure that each collocation was indeed an active fiber-based collocation and that the operators of these fiber-based collocations met the FCC's definition of a Fiber-Based Collocator.

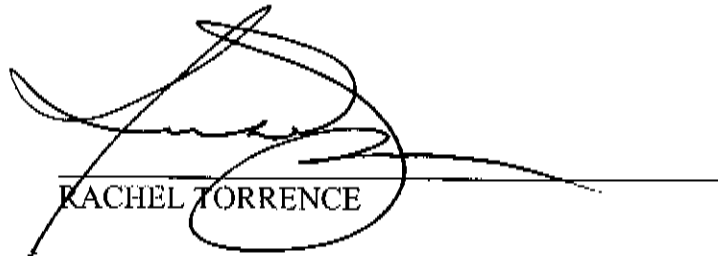
7. Qwest sent each of the identified Fiber-Based Collocators a letter requesting further validation of their status as a Fiber-Based Collocator. Based on their responses, and if necessary, I reconciled any discrepancies as to the physical aspects of the collocation (as noted on the physical verification worksheets) or in information with respect to changes in ownership, mergers and/or acquisitions (See Highly-Confidential Attachment C for a copy of the letter(s), and Highly Confidential Attachment D for a summary of the responses received and copies of the correspondence between Qwest and responding CLECs).

8. Qwest undertook a thorough analysis to ensure that the number of Fiber-Based Collocators in Qwest Wire Centers was accurately counted. Its process for identifying fiber-based collocators meeting the FCC's definition produced an accurate and verified count. The resulting list of additional Non-Impaired Utah Wire Centers, having relied on this accurate and verified data, is by extension just as accurate and should be validated by this Commission.

9. Qwest undertook a thorough analysis to ensure that the number of Fiber-Based Collocators in Qwest Wire Centers was accurately counted. Its process for identifying qualifying collocators produced an accurate and verified count. This accurate and verified data on the number of Fiber-Based Collocators was one of two factors in determining which Utah wire centers were Non-Impaired. The other factor was the number of Business Lines in each Wire Center based on the most recently filed ARMIS 43-08 data. The resulting list of additional Non-Impaired Utah Wire Centers, having relied on this accurate and verified data, is by extension just as accurate and should be validated by this Commission.

Further this affiant sayeth not.

DATE: June 21, 2010


RACHEL TORRENCE

SUBSCRIBED AND SWORN to before me the 21st day of June, 2010.


NOTARY PUBLIC

My Commission Expires:

SEP 04 2011

