

3. In support of the filing, I supervised an inventory of Fiber-Based Collocators in CenturyLink 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 oversaw 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 (The Collocation Verification Worksheets) are contained in Highly Confidential Attachment B to this affidavit.
5. Additionally, I supervised research of 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.
6. CenturyLink 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 oversaw the reconciliation of 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 letters, and Highly Confidential Attachment D for a summary of the responses received and copies of the correspondence between CenturyLink and responding CLECs).¹

¹ On 9/10/12 CenturyLink made filings similar to this one in several states. The affidavit filed in Utah inadvertently stated that no CLECs replied to CenturyLink’s letter requesting validation of their status as

7. CenturyLink undertook a thorough analysis to ensure that the number of Fiber-Based Collocators in CenturyLink 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 determination of a change in the non-impairment status of Utah Wire Centers, having relied on this accurate and verified data, is by extension just as accurate and should be validated by this Commission.

8. This accurate and verified data on the number of Fiber-Based Collocators was the sole determining factor in establishing which additional Utah wire centers were Non-Impaired. The numbers of Business Lines in each Wire Center based on the most recently filed ARMIS 43-08 data, and having no impact on the non-impairment status of any Utah wire centers at this time, were not considered for this filing.

fiber-based collocators. In fact one CLEC did reply. This reply was contained in Highly Confidential Attachment D which was filed on 9/10/13 with the original affidavit.

Further this affiant sayeth not.

DATE: September 11, 2013

RENÉE ALBERSHEIM

SUBSCRIBED AND SWORN to before me the 11th day of September, 2013.

NOTARY PUBLIC

My Commission Expires:
