

ATTACHMENT A

Docket No. 17-049-13

CenturyLink Letter

October 27, 2017

Additional information regarding the interconnection agreement between Qwest Corporation d/b/a CenturyLink QC and Cascade Access, LLC d/b/a Reliance:

- Cascade is a Competitive Local Exchange Carrier (CLEC) affiliate of Rio Virgin an Incumbent Local Exchange Carrier (ILEC). Rio Virgin serves in Mesquite, Nevada.
 - Cascade is a CLEC in Nevada and has informed CenturyLink that it will not be providing intrastate telecommunications services in Utah.
- This ICA is almost identical to the ICA between Emery Telecom and CenturyLink which was previously filed and acknowledged by the Utah PSC.¹
 - Direct Trunk Transport was added to this ICA, which is really the only difference from the Emery Telecom and CenturyLink ICA.
 - Like the agreement with Emery Telecom (CLEC) and its affiliate ILEC, this agreement allows Cascade to utilize the same meet point facility of its affiliate ILEC (Rio Virgin) for interconnection with CenturyLink.
- Because the Utah Local Access Transport Area (LATA) 660 covers areas in Utah and a small area in Nevada, Cascade needs to interconnect with the CenturyLink access tandem switch (CDCYUTMA02T) which is physically located in the Cedar City Utah area. Cascade needs to do this so that it can compete and serve customers located within the 660 LATA area in Nevada.
- This is a unique circumstance because LATAs for the most part usually fall within one state boundary.
- One of the core requirements that CenturyLink (ILEC) has is to provide interconnection for any requesting telecommunications carrier. Interconnection is to be provided for the transmission and routing of telephone exchange service and **exchange access**. Exchange access is defined as providing telephone exchange services for access to telephone toll services. Because Cascade is competing and serving within the 660 LATA in Nevada, it needs to be able to interconnect with the access tandem switch that serves the 660 LATA. That tandem switch (CDCYUTMA02T) is located within the Cedar City area.
- CenturyLink's obligation to interconnect is pursuant to 47 USC §251 (c)(2). All section 251 ICAs must be filed with the state commission under section §252 of the federal Act. The reason this specific agreement needs to be filed with the Utah PSC, and not the Nevada PUC, is because this ICA covers the Nevada portion of the 660 LATA, and the tandem switch serving the 660 LATA is within Utah.

¹ Docket No. 15-049-12, In the Matter of the Interconnection Agreement between Qwest Corporation dba CenturyLink QC and Emery Telecommunications & Video, Inc. dba Emery Telcom. PSC website link to Docket No. 15-049-11: <https://psc.utah.gov/2016/06/29/docket-no-15-049-11/>