



**Qwest**

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**R. Hance Haney**

Executive Director - Federal Regulatory

July 15, 2002

Ex Parte

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW TW-B204  
Washington, DC 20554

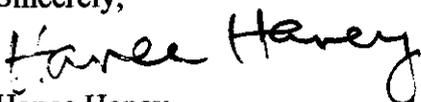
Re: Application by Qwest Communications International, Inc. for  
Authorization Under Section 271 of the Communications Act to Provide  
In-Region, InterLATA Service in the States of Colorado, Idaho, Nebraska,  
and North Dakota, WC Docket No. 02-148

Dear Ms. Dortch,

At their request, Qwest transmitted to DoJ staff the attached supplemental data regarding unbundling IDLC to provision ISDN/IDSL loops to CLECs.

The twenty page limit does not apply as set forth in DA 02-1390.

Sincerely,

  
Hance Haney

cc. M. Carowitz  
E. Yockus  
G. Remondino  
M. Cohen  
J. Jewel  
P. Baker  
C. Post  
P. Fahn  
B. Smith

**Unbundling IDLC to Provision ISDN/IDSL Loops to CLECs**

**Qwest is actually unbundling IDLC to provision unbundled ISDN and IDSL (xDSL-I) loops to CLECs, including New Edge, and has been for at least two years.**

- Qwest has been provisioning ISDN and IDSL loops that were unbundled from IDLC to CLECs since as early as February 2000. See Qwest's Comments Demonstrating Satisfaction of the FCC's Section 271 Change Management Evaluation Criteria, April 26, 2002, at 26-29, and Affidavit of Robert J. Hubbard, both attached to Qwest's 271 Application in Appendix K, Colorado Proceedings Vol. 1, Tabs 1309 and 1312.
- Regionwide, as of July 2002, Qwest has in service for CLECs 524 IDSL loops that were unbundled from IDLC.
- A comparison of the number of these loops Qwest has provisioned to CLECs to the number of these loops Qwest has in service for its own end-user customers shows that Qwest is not discriminating against CLECs. Only 162 of Qwest's retail IDSL lines have been unbundled from IDLC, compared to 524 IDSL lines provisioned for CLECs.
- The total number of ISDN and IDSL loops Qwest has in service further demonstrates that Qwest is not discriminating against CLECs. Regionwide, Qwest has 15,980 ISDN and IDSL loops in service for CLECs, compared to 2,045 for its own retail customers.

**Qwest's provisioning of unbundled loops over IDLC was examined in the state 271 proceedings.**

- Qwest's IDLC policies and procedures were vetted and honed in the state workshop process. For examples of discussions of IDLC issues in the Colorado workshops, see Qwest's 271 Application, Appendix K, Colorado Proceedings Vol. 1, Tab 659 (Tr. 4/17/01 pp. 92-99) and Tab 738 (pre-filed testimony of Jean M. Liston, pp. 9-13 and Exhibit JML-9, appended to Tr. 5/22/01).

- During the unbundled loop workshops, Qwest provided the CLECs with a detailed Engineering Decision Tree to describe the process Qwest employs to unbundle facilities when IDLC is present. The first box makes it clear that the Decision Tree applies to the unbundling of IDLC for any type of loop. A copy of this Decision Tree was filed with Qwest's 271 Application as Exhibit WMC-LOOP-6 to the Unbundled Loop Declaration of William M. Campbell.
- In Colorado, at staff's request, Qwest submitted data to demonstrate its success in provisioning unbundled loops over IDLC. *See* Qwest's Comments on Colorado Staff's Draft Volume VA Report regarding Checklist Items 2, 4 and 11 at 1-5 and Exhibit 2 (attached to Qwest's 271 Application in Appendix K, Colorado Proceedings Vol. 1, Tab 1092). The Colorado Hearing Commissioner specifically found that Qwest had "presented compelling evidence that it provisions loops over IDLC in a satisfactory manner." Colorado Volume VA Hearing Commissioner Report at 22 (attached to Qwest's 271 filing in Appendix K, Colorado Proceedings Vol. 1, Tab 1144).
- To ensure even greater clarity, Qwest has memorialized its commitment to provisioning loops over IDLC in its SGAT. SGAT § 9.2.2.1.3.
- The May 21, 2001 Colorado transcript excerpt included as an attachment to CompTel's July 3, 2002 comments needs to be looked at in context. Qwest's witness, Jean Liston, had just finished talking about the problems associated with converting POTS to analog loops in small rural offices where a high percent of IDLC was present. Although New Edge's representative was out of the room at the time, as the transcript reflects, the Colorado Commission staff asked how this issue would affect New Edge's entry strategy of targeting rural communities. New Edge primarily offers DSL service that requires short copper loops. The transcript makes it clear that Ms. Liston's response addressed that type of DSL deployment, not IDSL or ISDN loops.
- In her response, Ms. Liston explained that IDLC deployment in rural areas would not affect New Edge's services because in rural areas, customers tend to be far from the central offices and therefore would not be candidates for DSL service regardless of whether IDLC is deployed on those customers' loops. She then discussed a copper loop-based DSL service, which typically can

work only on loops of 18,000 feet or less. IDSL, in contrast, may be provided over loops of longer lengths.

**Qwest's documentation for CLECs makes clear that Qwest will provision unbundled loops over IDLC.**

- The relevant technical publication indicates that Qwest can provision ISDN and xDSL-I loops where IDLC is present. Qwest Technical Publication No. 77384, secs. 5.3, 5.4.
- Qwest's Wholesale Product Catalog ("PCAT") indicates that Qwest can provision ISDN and xDSL-I loops where IDLC is present. See <http://www.qwest.com/wholesale/pcat/unloop.html>.
- On April 11, 2002, Qwest augmented its PCAT and its Loop Qualification and Raw Loop Data Job Aid to ensure clarity that Qwest provisions unbundled digital loops where IDLC is present. This was not a policy change; as noted above, Qwest had been provisioning those loops to CLECs for some time. Rather, Qwest added greater detail to ensure that CLECs fully understand Qwest's offering. Qwest provided a CMP notification via a PCAT change. The Web Notification form clearly stated that the ISDN/IDSL (xDSL-I) product is available on IDLC.