



EX PARTE OR LATE FILED

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REDACTED

ORIGINAL

September 2, 2005

EX PARTE

RECEIVED

VIA HAND DELIVERY

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
Room TW B-204
445 12th Street, S.W.
Washington, DC 20554

DOCKET FILE COPY ORIGINAL

SEP - 2 2005

Federal Communications Commission
Office of Secretary

Re: *In the Matter of Petition of Qwest Corporation for Forbearance Pursuant to 47 U.S.C. § 160(c) in the Omaha Metropolitan Statistical Area – WC Docket No. 04-223*

Dear Ms. Dortch:

The Federal Communications Commission (“Commission”) has asked for further information regarding the data Qwest Corporation (“Qwest”) has provided in the above-referenced proceeding. Specifically, the Commission has requested that Qwest provide a clarification/comparison of the data contained in the Teitzel Affidavit and the data provided in Tabs 17 and 19 of the Data Notebook discussed with Commission Staff on July 25, 2005 and filed on July 27, 2005. Following is Qwest’s response to the Commission’s inquiries (each inquiry is summarized before the Qwest response):

1. Provide detail on the services included in the “Business Retail Lines in Service” category of the chart on page 3 of the Teitzel Affidavit that was filed as part of Qwest’s Forbearance Petition.

Page 3 of the Teitzel Affidavit provides the “in-service” totals of Qwest retail *switched* residential and business access lines in the Omaha Metropolitan Statistical Area (“MSA”). The business quantities referenced in the Teitzel Affidavit include all switched business services of DS0 and above and include standard switched flat business service, Centrex, Centrex Prime, Centrex 21, Centrex Plus, Digital Switched Service (DSS), ISDN Basic, ISDN Primary Rate, Integrated T-1, PBX Trunks, Switchnet 56, Simultaneous Voice and Data Service (SVDS) and Uniform Access Solution (UAS). These totals *EXCLUDE private line/special access* quantities.

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As Qwest has shown throughout this proceeding, there has been a [REDACTED]% decline in the retail business access lines from December 2000 through year end 2004.

2. Explain how the numbers on page 3 of the Teitzel Affidavit relate to the quantities provided in Tab 17, Attachment A.

Tab 17, Attachment A ("Tab 17A") was produced to answer a specific Commission Staff request about services Qwest provides in the Omaha MSA at DS1 levels and higher. The data in Tab 17A includes switched and non-switched (private line/special access) services at DS1 and above, and the line counts include only "lit" or "active" channels, consistent with the units that are the base for the Voice Grade Equivalent quantities included in the annual ARMIS reports. Qwest's initial filing on July 27, 2005 of Tab 17A included services purchased by carriers. At the request of the Commission Staff Qwest has revised Tab 17A to include exclusively DS1 and above services purchased as retail services and *contains no Special Access services purchased by carriers.*

The data in the attached revised Tab 17A is a picture of the Omaha MSA retail marketplace, and reflects all retail customers who purchase non-switched private lines at DS1 levels and above, or who purchase switched DS1s. The data provided on page 3 of the Teitzel Affidavit reflects only retail switched access lines, and as such is a subset of the data in revised Tab 17A.

3. Explain how the numbers in Tab 19, Attachment 1 relate to Tab 17, Attachment A.

The data in Tab 19, Attachment 1 represents only *wholesale* DS1 and DS3 special access services purchased by carriers. As previously stated, the information in revised Tab 17A includes only *retail* switched and non-switched (private line/special access) services at DS1 and above. As such, there is no "overlap" between the numbers provided in revised Tab 17A and those provided in Tab 19, Attachment 1.

Pursuant to paragraph 5 of the *Protective Order* in this proceeding (19 FCC Rcd 11377 (2004)), the data contained on page 2 of this ex parte presentation as well as in the revised Tab 17A are considered by Qwest to be confidential information (and thus are redacted from this correspondence). Qwest is submitting that data contained on page 2 of this ex parte presentation as well as the revised confidential version of Tab 17A today via hand delivery under separate cover. Pursuant to the *Protective Order*, Qwest requests that the data contained on page 2 of this ex parte presentation as well as the revised confidential version of Tab 17A be withheld from the public record. Included are an original and four copies of this letter (without the revised confidential version of Tab 17A attached).

This ex parte is being filed pursuant to 47 C.F.R. § 1.1206(b).

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A fifth copy of this letter is being provided, for which acknowledgment is requested. Please date-stamp the copy and return it to the courier. If you have any questions regarding this submission, please contact the undersigned at the contact information reflected in the letterhead. Thank you for your assistance with this matter.

Sincerely,

A handwritten signature in black ink that reads "Ronan Connell/CSK". The signature is written in a cursive style with a large initial "R" and "C".

Attachment

cc:

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