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EX PARTE

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July 10, 2007

Thomas Navin
Federal Communications Commission
Wireline Competition Bureau
445 12th Street, S.W.
Washington, DC 20554

Re: Unbundled Access to Network Elements, WC Docket No. 04-313; Review of Section 251 Unbundling Obligations for Incumbent Local Exchange Carriers, CC Docket No. 01-338

Dear Mr. Navin:

On February 18, 2005, in response to a request by the Wireline Competition Bureau, Qwest submitted lists identifying, by Common Language Location Identifier code, the wire centers in Qwest's operating area satisfying the non-impairment thresholds for high-capacity transport and loop facilities established in the *Triennial Review Remand Order* ("TRRO").¹ Qwest subsequently undertook a detailed verification process to ensure the accuracy of its initial lists, and, on July 8, 2005, Qwest filed revised lists of the wire centers in Qwest's region meeting the TRRO's non-impairment thresholds for high-capacity transport and loop facilities.²

Since that time, Qwest has worked with competitive local exchange carriers ("CLECs") in its service area to implement the Federal Communications Commission's TRRO requirements. As a part of that effort, dockets were opened in six states in Qwest's operating territory: Arizona, Colorado, Minnesota, Oregon, Utah and Washington. Qwest worked with CLECs in these dockets to arrive at an agreed-upon list of wire centers that meet the TRRO's non-impairment thresholds. As a result of those negotiations, Qwest entered into a settlement agreement with several CLECs, whereby Qwest modified its list of non-impaired wire centers.

¹ See Letter to Jeffrey J. Carlisle, Chief, Wireline Competition Bureau, from Gary R. Lytle, WC Docket No. 04-313 and CC Docket No. 01-338, dated Feb. 18, 2005.

² See Letter to Thomas Navin, Chief, Wireline Competition Bureau, from Cronan O'Connell, WC Docket No. 04-313 and CC Docket No. 01-338, dated July 8, 2005.

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We have attached the modified wire center list as Attachment A (“Qwest’s Initial List of Non-impaired Wire Centers”).

In addition to the wire centers identified in Attachment A, Qwest has identified other wire centers that now satisfy the Tier 1 or Tier 2 thresholds established in the *TRRO*, given increases in the number of access lines and/or fiber-based collocators in those wire centers. *See* Attachment B. This determination is based on 2006 ARMIS 43-08 business line data (filed April 1, 2007), business line counts associated with Qwest Platform Plus and other similar platform services, and UNE-loop data and fiber-based collocation information.

Please let me know if you have any questions about this matter.

Sincerely,

/s/ Melissa E. Newman

TRRO - Non-impaired Wire Centers

State	Wire center	CLLI Code	Non-impairment Classification	Non-impaired Elements	Date
AZ	McClintock	TEMPAZMC	Tier 1	DS1 and DS3 Transport	11-Mar-05
	Mesa	MESAAZMA	Tier 2	DS3 Transport	11-Mar-05
	Phoenix East	PHNXAZE	Tier 1	DS1 and DS3 Transport	11-Mar-05
	Phoenix Main	PHNXAZMA	Tier 1, DS3	DS1 and DS3 Transport; DS3 Loops	11-Mar-05
	Phoenix North	PHNXAZNO	Tier 1, DS3	DS1 and DS3 Transport; DS3 Loops	11-Mar-05
	Phoenix Northeast	PHNXAZNE	Tier 1	DS1 and DS3 Transport	11-Mar-05
	Scottsdale Main	SCDLAZMA	Tier 2	DS3 Transport	11-Mar-05
	Tempe	TEMPAZMA	Tier 1, DS3	DS1 and DS3 Transport; DS3 Loops	11-Mar-05
	Thunderbird	SCDLAZTH	Tier 1	DS1 and DS3 Transport	11-Mar-05
	Tucson Main	TCSNAZMA	Tier 2	DS3 Transport	11-Mar-05
CO	Aberdeen	ENWDCOAB	Tier 2	DS3 Transport	11-Mar-05
	Arvada	ARVDCOMA	Tier 2	DS3 Transport	11-Mar-05
	Aurora	AURRCOMA	Tier 2	DS3 Transport	11-Mar-05
	Boulder	BLDRCOMA	Tier 1	DS1 and DS3 Transport	11-Mar-05
	Capitol Hill	DNVRCOCH	Tier 1	DS1 and DS3 Transport	Tier 2 - 11-Mar-05, Tier 1 - 8-Jul-05
	Colo. Springs Main	CLSPCOMA	Tier 1, DS3	DS1 and DS3 Transport; DS3 Loops	Tier 2 - 11-Mar-05, Tier 1 - 8-Jul-05, DS3-L 30+ED
	Curtis Park	DNVRCOCP	Tier 1	DS1 and DS3 Transport	11-Mar-05
	Denver East	DNVRCOEA	Tier 1, DS3	DS1 and DS3 Transport; DS3 Loops	Tier 1 - 11-Mar-05, DS3-L 30+ED
	Denver Main	DNVRCOMA	Tier 1, DS3	DS1 and DS3 Transport; DS3 Loops	11-Mar-05
	Denver South	DNVRCOSO	Tier 2	DS3 Transport	11-Mar-05
	Denver Southeast	DNVRCOSE	Tier 2	DS3 Transport	8-Jul-05
	Dry Creek	DNVRCODC	Tier 1, DS3	DS1 and DS3 Transport; DS3 Loops	11-Mar-05
	Lakewood	LKWDCOMA	Tier 2	DS3 Transport	8-Jul-05
	Northglenn	NGLNCOMA	Tier 2	DS3 Transport	8-Jul-05
	Pikeview	CLSPCOPV	Tier 1	DS1 and DS3 Transport	Tier 2 - 11-Mar-05, Tier 1 - 8-Jul-05
	Sullivan	DNVRCOSL	Tier 1	DS1 and DS3 Transport	Tier 2 - 11-Mar-05, Tier 1 - 8-Jul-05
MN	Crystal	CRYSMNCR	Tier 2	DS3 Transport	11-Mar-05
	Eagan-Lexington	EAGNMNLB	Tier 2	DS3 Transport	11-Mar-05
	Eden Prairie	EDPRMNEP	Tier 2	DS3 Transport	8-Jul-05
	Maplewood	MPWDMNMA	Tier 2	DS3 Transport	11-Mar-05
	St. Paul Market	STPLMNMK	Tier 1, DS3	DS1 and DS3 Transport; DS3 Loops	11-Mar-05
	Mpls 7th Av.	MPLSMN07	Tier 2	DS3 Transport	11-Mar-05
	Mpls Downtown	MPLSMNDT	Tier 1, DS3, DS1	DS1 and DS3 Transport; DS3 and DS1 Loops	11-Mar-05
	Normandale	BLTNMNNO	Tier 1	DS1 and DS3 Transport	Tier 2 - 11-Mar-05, Tier 1 - 8-Jul-05
	Orchard	GLVYMNOR	Tier 1	DS1 and DS3 Transport	11-Mar-05
	Rochester	ROCHMNRO	Tier 2	DS3 Transport	11-Mar-05
	St. Cloud	STCDMNTO	Tier 2	DS3 Transport	11-Mar-05
Fargo/Moorhead (ND & Mir	FARGNDBC	Tier 2	DS3 Transport	11-Mar-05	

OR	Bend	BENDOR24	Tier 2	DS3 Transport	11-Mar-05
	Eugene 10th Av.	EUGNOR53	Tier 1	DS1 and DS3 Transport	11-Mar-05
	Medford	MDFDOR33	Tier 2	DS3 Transport	11-Mar-05
	Portland Alpine	PTLDOR11	Tier 2	DS3 Transport	11-Mar-05
	Portland Belmont	PTLDOR13	Tier 2	DS3 Transport	11-Mar-05
	Portland Capitol	PTLDOR69	Tier 1, DS3, DS1	DS1 and DS3 Transport; DS3 and DS1 Loops	11-Mar-05
UT	Salem Main	SALMOR58	Tier 1	DS1 and DS3 Transport	11-Mar-05
	Murray	MRRYUTMA	Tier 1	DS1 and DS3 Transport	11-Mar-05
	Ogden Main	OGDNUTMA	Tier 1	DS1 and DS3 Transport	11-Mar-05
	Provo	PROVUTMA	Tier 1	DS1 and DS3 Transport	11-Mar-05
	Salt Lake City Main	SLKCUTMA	Tier 1, DS3	DS1 and DS3 Transport; DS3 Loops	11-Mar-05
	Salt Lake City South	SLKCUTSO	Tier 1	DS1 and DS3 Transport	Tier 1 - 8-Jul-05
WA	Salt Lake City West	SLKCUTWE	Tier 1	DS1 and DS3 Transport	Tier 2 - 11-Mar-05, Tier 1 8-Jul-05
	Bellevue Glencourt	BLLVWAGL	Tier 2	DS1 and DS3 Transport	11-Mar-05
	Bellevue Sherwood	BLLVWASH	Tier 1	DS1 and DS3 Transport	11-Mar-05
	Kent O'Brien	KENTWAOB	Tier 1	DS1 and DS3 Transport	11-Mar-05
	Olympia Whitehall	OLYMWA02	Tier 1	DS1 and DS3 Transport	11-Mar-05
	Seattle Atwater	STTLWA05	Tier 1	DS1 and DS3 Transport	8-Jul-05
	Seattle Campus	STTLWACA	Tier 1	DS1 and DS3 Transport	8-Jul-05
	Seattle Cherry	STTLWACH	Tier 2	DS3 Transport	11-Mar-05
	Seattle Dumwamish	STTLWADU	Tier 2	DS3 Transport	8-Jul-05
	Seattle East	STTLWA03	Tier 1	DS1 and DS3 Transport	11-Mar-05
	Seattle Elliott	STTLWAEL	Tier 1	DS1 and DS3 Transport	11-Mar-05
	Seattle Main	STTLWA06	Tier 1, DS3, DS1	DS1 and DS3 Transport; DS3 and DS1 Loops	11-Mar-05
	Spokane Riverside	SPKNWA01	Tier 1	DS1 and DS3 Transport	11-Mar-05
Tacoma Fawcett	TACMWAFA	Tier 2	DS3 Transport	11-Mar-05	

NOTES:

DS1Transport circuits provided by Qwest that originate in a "Tier 1" wire center and terminate in a "Tier 1" wire center are considered non-impaired.

DS3 Transport circuits provided by Qwest that originate in a "Tier 1" or "Tier 2" wire center and terminate in a "Tier 1" or "Tier 2" wire center are considered non-impaired.

DS1 loops provided by Qwest that reside in a wire center classified as "DS1 Loops" are considered to be non-impaired.

DS3 loops provided by Qwest that reside in a wire center classified as "DS3 Loops" are considered to be non-impaired.

30 days + ED = 30 days after Commission Order approving Settlement Agreement with Attachment A

2007 ADDITIONS TO QWEST NON-IMPAIRED WIRE CENTER LIST

STATE	WIRE CENTER	CLLI8	TIER	NO IMPAIREMENT FOR	BASIS FOR DESIGNATION
AZ	Chandler Main	CHNDAZMA	Tier 2	DS3 Transport & DF	Business Lines
	Chandler West	CHNDAZWE	Tier 2	DS3 Transport & DF	Business Lines
	Phoenix Cactus	PHNXAZCA	Tier 2	DS3 Transport & DF	Business Lines
	Phoenix Greenway	PHNXAZGR	Tier 2	DS3 Transport & DF	Business Lines
	Phoenix Southeast	PHNXAZSE	Tier 1	DS1 and DS3 Transport & DF	Fiber-Based Collocations
	Phoenix Sunnyslope	PHNXAZSY	Tier 2	DS3 Transport & DF	Business Lines
	Phoenix West	PHNXAZWE	Tier 2	DS3 Transport & DF	Business Lines
	Superstition West	SPRSAZWE	Tier 2	DS3 Transport & DF	Business Lines
CO	Broomfield Main	BRFDCOMA	Tier 2	DS3 Transport & DF	Business Lines
	Colo. Springs East	CLSPCOEA	Tier 2	DS3 Transport & DF	Business Lines
	Dry Creek	DNVRCODC	Tier 1	DS1 and DS3 Transport; DF; DS1 & DS3 Loops	Business Lines
	Aberdeen	ENWDCOAB	Tier 1	DS1 and DS3 Transport & DF	Business Lines
MN	Brainard	BRNRMNBR	Tier 1	DS1 and DS3 Transport & DF	Fiber-Based Collocations
	Eagan-Lexington	EAGNMNLB	Tier 1	DS1 and DS3 Transport & DF	Business Lines
	Eden Prairie	EDPRMNEP	Tier 1	DS1 and DS3 Transport & DF	Fiber-Based Collocations
	Owatonna	OWTNMNOW	Tier 2	DS3 Transport & DF	Fiber-Based Collocations
	Fernbrook	PLMOMNFE	Tier 2	DS3 Transport & DF	Fiber-Based Collocations
	St.Paul-Midway	STPLMNMI	Tier 2	DS3 Transport & DF	Business Lines
OR	Eugene 10 th Ave	EUGNOR53	Tier 1	DS1 & DS3 Transport; DF; DS3 Loops	Fiber-Based Collocations
	Roseberg	RSBGOR57	Tier 2	DS3 Transport & DF	Fiber-Based Collocations
	Salem-Main	SALMOR58	Tier 1	DS1 & DS3 Transport; DF; DS3 Loops	Fiber-Based Collocations

2007 ADDITIONS TO QWEST NON-IMPAIRED WIRE CENTER LIST

STATE	WIRE CENTER	CLLI8	TIER	NO IMPAIREMENT FOR	BASIS FOR DESIGNATION
UT	Midvale Main	MDVAUTMA	Tier 2	DS3 Transport & DF	Business Lines or Fiber-Based Collocations
	Orem Main	OREMUTMA	Tier 2	DS3 Transport & DF	Business Lines
WA	Bellevue Glencourt	BLLVWAGL	Tier 1	DS1 and DS3 Transport; DF	Business Lines
	Orchards	ORCHWA01	Tier 2	DS3 Transport & DF	Business Lines
	Spokane Walnut	SPKNWAWA	Tier 2	DS3 Transport & DF	Business Lines

FCC PRESCRIBED THRESHOLDS FOR NON-IMPAIRMENT:

TIER 1 WIRE CENTERS: At least four (4) Fiber-Based Collocators OR 38,000 Business Lines

TIER 2 WIRE CENTERS: At least three (3) Fiber-Based Collocators OR 24,000 Business Lines

DS1 LOOPS: At least 60,000 Business Lines AND four (4) or more Fiber-Based Collocators

DS3 LOOPS: At least 38,000 Business Lines AND four (4) or more Fiber-Based Collocators