

Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, D.C. 20554

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

**DECLARATION OF DR. AUGUST H. ANKUM**

1. My name is August H. Ankum, Ph.D. I am a Senior Vice President at QSI Consulting, Inc., a consulting firm specializing in economics and telecommunications issues. My business address is 1027 Arch Street, Suite #304, Philadelphia, PA 19107. I received a Ph.D. in Economics from the University of Texas at Austin in 1992, an M.A. in Economics from the University of Texas at Austin in 1987, and a B.A. in Economics from Quincy College, Illinois, in 1982.

2. My professional background covers work experiences in private industry and at state regulatory agencies. As a consultant, I have worked with large companies, such as AT&T and AT&T Wireless (prior to their acquisition and merger with SBC Communications) and MCI WorldCom (“MCIW”) (prior to its acquisition and merger with Verizon), as well as with smaller carriers, including a variety of competitive local exchange carriers (“CLECs”) and wireless carriers. I have worked on many of the arbitration proceedings between new entrants and incumbent local exchange carriers (“ILECs”). Specifically, I have been involved in arbitrations between new entrants and NYNEX, Bell Atlantic, U S WEST, BellSouth, Ameritech, SBC, GTE and Puerto Rico Telephone and their successor companies, including Verizon. Prior to practicing as a telecommunications consultant, I worked for MCI Telecommunications Corporation (“MCI”) as a senior economist. At MCI, I provided expert witness testimony and

conducted economic analyses for internal purposes. Before I joined MCI in early 1995, I worked for Teleport Communications Group, Inc. (“TCG”), as a Manager in the Regulatory and External Affairs Division. In this capacity, I testified on behalf of TCG in proceedings concerning local exchange competition issues, such as Ameritech’s Customer First proceeding in Illinois. From 1986 until early 1994, I was employed as an economist by the Public Utility Commission of Texas (“PUCT”) where I worked on a variety of electric power and telecommunications issues. During my last year at the PUCT, I held the position of chief economist. Prior to joining the PUCT, I taught undergraduate courses in economics as an Assistant Instructor at the University of Texas from 1984 to 1986. I have more than ten years experience in development and implementation of strategic business plans in the competitive telecommunications industry. I have factual knowledge relating to the information described in this Declaration.

3. Based on my extensive work reviewing Qwest Corporation cost models with respect to the installation of Section 251(c)(3) unbundled network elements (“UNEs”), I am familiar with the systems and order processing centers used by Qwest to provision UNEs.

4. Qwest generally uses centralized order processing centers to provision UNEs across all fourteen states of its serving area, and the cost of developing the UNE order processing system has already been incurred. Eliminating Qwest’s obligation to process UNEs in a limited subset of nine wire centers within one individual state will not have a material impact on the incremental cost Qwest incurs in maintaining its order processing centers and provisioning UNEs out of the service centers covering that state.

5. Further, many of Qwest’s OSS and other operational support for provisioning services and facilities are shared between Qwest’s various wholesale operations. For example, the provisioning processes of special access and UNE facilities are nearly indistinguishable.

Thus, relieving Qwest of its obligations to provide services and facilities as UNEs in a select subset of wire centers will not materially reduce Qwest's costs.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed July 23, 2007

A handwritten signature in cursive script, appearing to read "A. Ankum", written in black ink.

August H. Ankum, Ph.D