

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of)
)
Petition of Qwest Corporation for Forbearance) WC Docket No. 07-97
Pursuant to 47 U.S.C. § 160(c) in the Minneapolis/)
St. Paul Metropolitan Statistical Area)

EX PARTE

**Comments of the
Minnesota Public Utilities Commission**

February 8, 2008
St. Paul, Minnesota

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I. Summary

The Minnesota Public Utilities Commission (“MNPUC”) respectfully submits these comments in the above-captioned proceeding. On April 27, 2007, Qwest Corporation (“Qwest”) filed a petition (“MSP Petition”) pursuant to Section 10 of the Communications Act of 1934 as amended (“Act”), requesting the Federal Communications Commission (“Commission”) to forbear from applying a broad range of federal regulations that currently apply to its interstate service offerings in the Minneapolis/St. Paul Metropolitan Statistical Area (“MSP MSA”). The MNPUC recommends that the Commission deny the MSP Petition because the scope of the relief Qwest requests would substantially impede or entirely eliminate telecommunications competition in the MSP MSA.

II. Introduction

Qwest petitions the Commission to forbear from continuing to apply a broad

array of federal regulations to its operations in the MSP MSA. The MSP Petition uses Section 10 of the Act as the basis for eliminating existing statutory obligations applied to its interstate service offerings, including unbundled loops and transport and special access services sold to end users and competitors.

The MSP Petition is joined by companion forbearance petitions for Qwest's operations in the Phoenix, Seattle and Denver Metropolitan Statistical Areas. Collectively, the petitions come on the heels of action the Commission took in 2005 on a similar petition regarding Qwest's operations in Omaha, Nebraska. The Commission's order on Omaha, by its own terms, is not precedent and specifically states that petitions for other areas must be evaluated based on the circumstances in those areas.

The MNPUC has grave concerns regarding the scope of Qwest's MSP Petition and the adverse effects it will have on competition if granted in whole. The Minnesota Legislature has given the MNPUC statutory authority to regulate telecommunications companies in the public interest, to promote customer choice, and to encourage efficient deployment of infrastructure.¹ In numerous regulatory proceedings over the past decade, the MNPUC has endeavored to establish balanced policies to ensure that effective competition develops in the state wherever possible and to ensure conditions that promote competition.

The evidence presented to the MNPUC as part of its investigations demonstrates that Competitive Local Exchange Carriers ("CLECs") rely on Qwest's

¹ Minn. Stat. § 237.011.

wholesale facilities to enable them to offer telecommunications customers effective competitive alternatives to Qwest's services, and that for a large portion of the market it is infeasible for the CLECs to duplicate Qwest's facilities ... facilities constructed by Qwest over decades under the regulatory protection of the MNPUC. However, the vast scope of the relief Qwest seeks in the MSP Petition, if granted, would undercut the very foundation and delicate balance of the MNPUC's past decisions regarding the promotion of competition

III. The MSP Petition

An Incumbent Local Exchange Carrier ("ILEC") requesting forbearance must show that three elements of Section 10 of the Act are satisfied. In particular, Section 10(a) provides that the Commission shall forbear from applying any regulation or any provision of the Act to a telecommunications carrier or telecommunications service, or class of telecommunications carriers or telecommunications services, in any or some of the carriers geographic markets, if the Commission determines that:

- (1) enforcement of such regulation or provision is not necessary to ensure that the charges, practices, classifications or regulations by, for, or in connection with that telecommunications carrier or telecommunications service are just and reasonable, and are not unjustly or unreasonably discriminatory;
- (2) enforcement of such regulation or provision is not necessary for the protection of consumers; and
- (3) forbearance from applying such provision or regulation is consistent with the public interest.

In the MSP Petition, Qwest argues that mass market consumers have access to a wide range of competitive alternatives, including cable television providers,

wireline CLECs, wireless carriers, and voice over internet protocol (“VOIP”) providers, and that extensive wholesale alternatives are available to its competitors. Qwest similarly argues that enterprise consumers have access to a range of competitive options including cable television providers, CLECs, VOIP providers and competitive fiber-based alternatives. To support its position, Qwest cites the apparent decline in the number of mass market and enterprise access lines it serves as evidence of robust competition in those market segments, particularly competition from wireline carriers and intermodal competitors.

As a consequence, Qwest seeks forbearance from applying the following:

- (a) Loop and transport unbundling obligations pursuant to 47 U.S.C. § 251(c)(3);
- (b) Dominant tariffing requirements and Section 214 procedures for acquiring and disposing of network facilities and discontinuing interstate services;
- (c) Price cap regulation of its interstate switched and special access services; and,
- (d) Existing Computer IE requirements including Comparably Efficient Interconnection (“CEI”) and Open Network Architecture (“ONA”) services offered pursuant to tariff.

IV. Summary of Minnesota Proceeding

The MNPUC sought input from interested parties as to whether it should file comments with the Commission.² The MNPUC initiated two cycles of written

² *In the Matter of the Minnesota Public Utilities Commission’s Inquiry Regarding the Petition of Qwest Corporation, Filed with the Federal Communications Commission, for Forbearance Pursuant to 47 U.S.C. Section 160(c) in the Minneapolis-St. Paul Minnesota Metropolitan Statistical Area, Docket No. P-421/CI-07-661.*

comments, allowing the parties to present statements of fact and verified pleadings. Additionally, the MNPUC heard several hours of oral argument. Based on consideration of the Minnesota record, the MNPUC has grave concerns regarding Qwest's MSP Petition and urges the Commission to deny Qwest's petition.

V. Qwest's Petition Focuses on Competition Faced by Qwest, Not on the Competitive Services Available to Consumers

Qwest has presented considerable data to the MNPUC, arguing that it faces substantial competition in the MSP MSA. However, even without challenging Qwest's figures, much of its analytical argument is not on point. Qwest may indeed face competition in aggregate, but the more relevant issue is the extent to which competitive services are available to consumers in the MSP MSA. Consumer service requirements vary considerably across the MSP MSA and, for the most part, consumers are bounded by their geographical location. Thus, even though Qwest may face competitive erosion of its total services revenues, consumers requiring a specific service in a particular location may have no alternative to Qwest as a provider of that service. It is of little matter to a mid-sized business of 50 data lines if the only alternatives to Qwest are wireless and cable providers that cannot provide the bandwidth and security required by the business. All services are not good substitutes for each other, and a service available in one location is not a substitute for that service in another location. As such, Qwest's analysis is flawed in its focus. It is not sufficiently granular to indicate whether effective alternatives are sufficiently widespread to allow the MNPUC to conclude that the markets, as characterized by

Qwest, are competitive. Any analysis must account for a much finer distinction between customers than the enterprise/mass-market dichotomy proposed by Qwest.

VI. Evidence Suggests There Are No Significant Alternatives to Qwest's Wholesale Facilities

The most compelling data in the MNPUC record were provided by the CLEC Coalition (a group of 8 CLECs providing service in Minnesota). The Coalition provided data obtained from GeoResults, a third-party vendor of telecommunication network data.³ These data indicate that the proportion of commercial businesses within the MSP MSA that are connected to CLEC-owned loops is less than 3 percent, and the number of commercial buildings connected to "lit" CLEC-owned fibre loops is only 0.3 percent. Furthermore, wireless and cable options are effectively nonexistent for business customers. GeoResults data indicate that cable deployment to business is almost nonexistent in the MSP MSA. Integra, McLeodUSA and Popp.com reported that, in total in 2006 and a portion of 2007, they have lost only 0.14 percent of their customers to cable providers and 0.10 percent to wireless providers. Thus, for a wide range of business customers, the CLECs, by purchasing Qwest's wholesale facilities, provide the only alternative to Qwest's retail services. To the extent that Qwest can restrict the sale of wholesale services (via price or otherwise), the CLECs will not be able to offer competition to Qwest.

The GeoResults data is supported by an analysis provided by the Minnesota Department of Commerce ("MNDOC")(see Attachment A). In a survey of ten

³ Filed on August 17, 2007; Ibid.

Minnesota CLECs, the MNDOC determined that for small businesses (1 to 3 lines) 91 percent of the CLECs relied on Qwest wholesale facilities. For medium businesses (4 to 200 lines) CLECs relied on Qwest facilities to serve 92 percent of their lines.

For the largest of business customers (a small segment of the industry) CLECs compete with Qwest by way of constructing their own facilities, obviating the need for Qwest's UNEs. As such, reduced regulatory oversight of Qwest's wholesale facilities offers neither Qwest, the CLECs, nor the large business customers any benefit.

In the residential sector, cable and wireless alternatives are somewhat more attractive to customers than in the business sector. However, wireless service still remains much more of a complement to wireline service than it is a substitute. And with respect to a cable alternative, Comcast has announced that it is withdrawing its basic residential service offering in Minnesota, thus leaving the CLEC community as the single option to Qwest for a subgroup of customers. In the absence of the CLEC option, and for those customers seeking more advanced services, the industry offers a Qwest/Comcast duopoly, generating little confidence that competitive forces will be robust and lasting. Note that the MNDOC determined that 27 percent of residential lines served by CLECs relied upon Qwest's facilities (Attachment A).

VII. It is Economically Infeasible for the CLECs to Duplicate Most of Qwest's Wholesale Facilities

Given the front-end cost of constructing facilities, the CLECs require a large volume of assured traffic to make construction feasible. For instance, XO Communications

reported that constructing interoffice transport does not make economic sense until the company has accumulated at least 9 to 12 DS3s of traffic on a relevant route.

VIII. Qwest's Rates for DS0 Loops and Special Access are Significantly Higher Than Rates That Would Prevail in a Competitive Market

The Commission has established that the Total Element Long Run Incremental Cost (TELRIC) of the provision of service is an appropriate proxy for competitive market rates where such a market does not exist. When granted forbearance in portions of the Omaha MSA, Qwest raised its rates for DS0 Loops quite significantly. If granted forbearance in the MSP MSA, Qwest may raise rates in Minnesota as it did in Omaha. With respect to Special Access rates (DS1 and DS3) Qwest, if it succeeds in its petition, will offer these elements at its tariffed rates, which presently are a multiple of the prevailing TELRIC rates. Given that the TELRIC standard is designed to approximate competitive market rates, any rates set above TELRIC (to the extent purchases are made at those rates) indicate that the market is not competitive, that is, the rates reflect monopoly power. Thus, even though transactions may occur at rates above TELRIC, such rates can not be considered the result of a competitive market process.

IX. An Error in Predictive Judgement, Effectively, May Be Irreversible

The decision before the Commission calls for evaluation of numerous factors in the absence of contested and ideally sufficient data, thus rendering uncertain any predictive judgement. In the presence of such uncertainty, it is of critical importance to consider the potential impacts of misjudgement. Rejection by the Commission of

Qwest's MSP Petition does not leave Qwest without an avenue to reduce regulatory oversight. The Commission's *Triennial Review Remand Order* sets forth an alternative process and criteria for relaxing oversight, where such relaxation does not impair competition. By this process, Qwest has already limited or eliminated CLEC access to certain high capacity UNEs in 9 of Qwest's 58 wire centers in the MSP MSA.⁴ In contrast, consider the CLEC community which, for a large proportion of their customers, rely on Qwest's infrastructure. Evidence presented before the MNPUC strongly suggests that many Minnesota CLECs may withdraw entirely from the market should Qwest's MSP Petition be granted. In such case, in today's capital markets, it is highly unlikely that these providers would re-enter the market in any foreseeable future. In sum, any misjudgement in the granting of Qwest's MSP Petition may be catastrophic, irreversible.

X. Conclusion

Qwest's petition does not provide meaningful data or other sufficient justification to warrant the broad scope of the requested relief. Eliminating UNE availability throughout the MSP MSA, coupled with removing any effective price capping of interstate special access services, would significantly impair the prospects for effective competition in the MSP MSA, particularly in the enterprise market segment. The MNPUC strongly recommends that the MSP Petition be denied in entirety.

⁴ At present, the MNPUC is reviewing Qwest's request, pursuant to the TRRO, for relaxed oversight of an additional four MSP MSA exchanges.

Respectfully submitted this 8th day of February, 2008

/s/ Burl W. Haar

Burl W. Haar
Executive Secretary
Minnesota Public Utilities Commission
121 Seventh Place East
Suite 350
St. Paul, MN 55101-2147

Attachment A



September 19, 2007

Burl W. Haar
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101-2147

RE: In the Matter of the Minnesota Public Utilities Commission's Inquiry Regarding the Petition of Qwest Corporation, Filed with the Federal Communications Commission, for Forbearance Pursuant to 47 U.S.C. Section 160(c) in the Minneapolis-St. Paul Minnesota Metropolitan Statistical Area, Docket No. P421/CI-07-661

Dear Dr. Haar:

The attached tables are supplements to the materials submitted by the Department in this case on September 14, 2007.

The following materials are attached:

1. A revised copy of the Summary table submitted earlier. The revisions involve a minor adjustment for a few lines not in the MSA and the inclusion of percentages inadvertently left off the earlier table. [1 page]
2. A new table showing the breakdown of the line counts by wire center into Customer Type and Method of Provision. The wire center detail information is available only for nine of the ten CLECs¹ for which MSA-wide information is available, so the wire center detail shown in the enclosed table is scaled up to the ten CLEC totals.² [16 pages]

This table includes a Summary by UNE Zone table that gives the wire center detail for the four zones that have been approved by the Commission to geographically deaverage the UNE loop prices.

3. A table summarizing the Customer Type by wire center, showing the percentage of the lines in the wire center. The Customer Type subtotals by wire center come from item 2 above. [4 pages]

¹ The ten CLECs that submitted data are ATT/TCG, Covad, Eschelon, Integra, MCImetro, McLeodUSA, Onvoy, Popp, TDS Metrocom and XO.

² The total lines for each wire center are somewhat different in this table compared to the Summary by Wire Center submitted on September 14 because the earlier scaling was done based on the total lines while the current more detailed table is scaled based on subtotals by Customer Type and Method of Provision. Note that the more detailed scaling approach places significantly more lines in the Minneapolis Downtown wire center.

Burl W. Haar
September 19, 2007
Page 2

All of this information involves a summation of data from various CLECs, so none of it is Trade Secret.

Feel free to contact me with any questions concerning this information.

Sincerely,

/s/ EDWARD FAGERLUND
Telecommunications Unit

EF/ja
Attachment

Reported line counts for Ten CLEC serving the Twin Cities MSA
 Minnesota Department of Commerce
 Qwest Forbearance Case (Docket No. P421/CI-07-661)
September 14, 2007 (revised September 19, 2007)

Lines by Customer Type		Lines by Method of Provision and Customer Type											
		all own facil		other CLEC facil		Q-UNEs (partial)		Q-resale		Q - Sp Ac/Cm Ag		Unknown	Total
		lines	%	lines	%	lines	%	lines	%	lines	%	Method	lines
Residence	46,456	0	0%	0	0%	12,348	27%	1,050	2%	33,058	71%		46,456
Small business (1-3 lines)	<u>20,020</u>	<u>0</u>	0%	<u>0</u>	0%	<u>17,138</u>	91%	<u>14</u>	0%	<u>1,688</u>	9%	<u>1,180</u>	20,020
Mass market lines	66,476	0	0%	0	0%	29,486	45%	1,064	2%	34,746	53%	1,180	66,476
Medium business (4-200 lines)	181,838	7,776	5%	0	0%	136,582	92%	3,250	2%	1,437	1%	32,793	181,838
Large business lines (over 200)	32,545	18,720	62%	0	0%	9,619	32%	1,840	6%	0	0%	2,366	32,545
Other enterprise-mostly lg bus	<u>99,747</u>	<u>74,822</u>	75%	<u>1,385</u>	1%	<u>6,467</u>	6%	<u>0</u>	0%	<u>17,073</u>	17%	<u>0</u>	99,747
Enterprise market lines	314,130	101,318	36%	1,385	0%	152,668	55%	5,090	2%	18,510	7%	35,159	314,130
Total lines	380,606	101,318	29%	1,385	0%	182,154	53%	6,154	2%	53,256	15%	36,339	380,606

Percentages are of the lines excluding lines with unknown method of provision.

This Summary table is revised to remove a few lines not in the MSA and to show all the percentages on the Other enterprise line.

Reported line counts by wire center for certain CLECs serving the Twin Cities MSA
Qwest Forbearance Case (Docket No. P421/CI-07-661)

	A	B	C	D	E	F	G	H	I	J
1	Customer Type			Res	%	Res	%	Res	%	Res
2	Method of Provision:			SpAc/ComAg		Q UNE		Resale		Subtotal
3										
4	wire center	CLI	zone							
5	Minneapolis Dow	MPLSMNDT	1	372	61%	195	32%	45	7%	612
6	Cedar	BLTNMNCE	2	219	77%	43	15%	21	7%	283
7	Normandale	BLTNMNNO	2	503	72%	178	26%	16	2%	697
8	Crystal	CRYSMNCR	2	639	66%	322	33%	12	1%	974
9	Orchard	GLVYMNOR	2	850	70%	282	23%	79	7%	1,212
10	Minneapolis 7th A	MPLSMN07	2	277	63%	152	34%	13	3%	442
11	Minneapolis Fran	MPLSMNFR	2	382	71%	149	28%	10	2%	541
12	Fort Snelling	MPLSMNFS	2	71	75%	22	24%	2	2%	95
13	Beech	STPLMNBE	2	991	74%	335	25%	6	0%	1,331
14	Emerson	STPLMNEM	2	441	55%	354	44%	6	1%	801
15	Front	STPLMNH	2	581	70%	244	29%	8	1%	834
16	Midway	STPLMNMI	2	530	59%	316	35%	52	6%	897
17	Market	STPLMNMK	2	783	70%	294	26%	39	3%	1,116
18	South	BLTNMNNO	3	1,085	72%	392	26%	26	2%	1,503
19	Fridley	FRDLMNFR	3	443	68%	194	30%	10	2%	647
20	Hopkins	HPKMNHO	3	1,013	70%	393	27%	32	2%	1,438
21	Minneapolis Bear	MPLSMNBE	3	1,510	79%	388	20%	16	1%	1,913
22	Central Avenue	MPLSMNGE	3	721	70%	295	29%	8	1%	1,024
23	Penn Avenue	MPLSMNPE	3	321	77%	91	22%	3	1%	414
24	Pillsbury Avenue	MPLSMNPI	3	971	69%	416	30%	22	2%	1,408
25	Minneapolis 24th	MPLSMNTE	3	951	69%	402	29%	28	2%	1,380
26	Maplewood	MPWDMNMA	3	923	72%	346	27%	13	1%	1,282
27	Cleveland	NWBTMNCL	3	399	63%	203	32%	37	6%	638
28	Minneapolis 66th	RCFDMN66	3	985	77%	290	23%	12	1%	1,287
29	Oakdale West	WSPLMNWS	3	718	68%	324	31%	19	2%	1,061
30	Afton	AFTNMNAF	4	188	99%	1	0%	1	1%	189
31	Anoka	ANOKMNAN	4	881	61%	477	33%	80	6%	1,439
32	Buffalo	BFLOMNBU	4	481	83%	87	15%	8	1%	576
33	Blaine	BLANMNBL	4	1,027	73%	361	26%	27	2%	1,415
34	Brooklyn Center	BRCTMNBC	4	674	66%	335	33%	6	1%	1,015
35	Braham	BRHMMNBR	4	184	100%	0	0%	0	0%	184
36	Burnsville-Qwest	BRVLMNBU	4	657	75%	184	21%	40	5%	882
37	Cambridge	CMBRMNCA	4	353	100%	1	0%	0	0%	354
38	Coon Rapids	CNRPMNND	4	872	61%	532	37%	24	2%	1,428
39	Cottage Grove	CTGVMNCG	4	450	68%	211	32%	4	1%	665
40	Lexington	EAGNMNLB	4	994	68%	358	25%	102	7%	1,455
41	Eden Prairie	EDPRMNPE	4	783	70%	287	26%	52	5%	1,122
42	Glen Prairie	EDPRMNPG	4	710	80%	170	19%	9	1%	890
43	Elk River	EKRVMNER	4	499	65%	260	34%	3	0%	762
44	Excelsior	EXCLMNEX	4	494	68%	230	32%	6	1%	730
45	Forest Lake	FRLKMNFL	4	346	68%	162	32%	2	0%	510
46	Hamel	HAMLMNHB	4	91	78%	26	22%	0	0%	117
47	Hanover	HNVRMNHB	4	44	97%	1	3%	0	0%	45
48	Isanti	ISNTMNIS	4	273	100%	0	0%	0	0%	273
49	Bryant	MPLSMNBB	4	1,200	82%	260	18%	10	1%	1,469
50	North Branch	NBRNMNBN	4	284	76%	87	23%	2	1%	373
51	Park Row	NSPLMNPR	4	619	67%	300	32%	11	1%	930
52	Navarre	NVRRMNNA	4	80	95%	4	5%	0	0%	85
53	Oak Grove	OKGVMNOG	4	330	97%	5	1%	4	1%	338
54	Plymouth Fernbro	PLMOMNFE	4	419	60%	248	36%	26	4%	693
55	Rockford	RCFRMNRO	4	100	100%	0	0%	0	0%	100
56	Rush City	RSCVMNRC	4	151	98%	0	0%	2	1%	153
57	Soderville	SDVLMNSO	4	372	99%	1	0%	3	1%	375
58	Shakopee	SHKPMNSH	4	557	65%	288	34%	11	1%	856
59	Rice Street	SHVVMNRI	4	663	71%	232	25%	42	4%	936
60	Stillwater	STWRMNST	4	357	67%	168	32%	5	1%	530
61	White Bear Lake	WBLKMNWB	4	659	69%	285	30%	14	1%	958
62	Wayzata	WYZTMNWA	4	588	76%	164	21%	23	3%	775
63	Total for 58 exchgs			33,058	71%	12,348	27%	1,050	2%	46,456
64										

Reported line counts by wire center for certain CLECs serving the Twin Cities MSA
Qwest Forbearance Case (Docket No. P421/CI-07-661)

	A	B	C	K	L	M	N	O	P	Q	R
1	Customer Type			Sm B	%	Sm B	%	Sm B	%	Sm B	Sm B
2	Method of Provision:			SpAc/ComAg		Q UNE		Resale		Unknown	Subtotal
3											
4	wire center	CLLI	zone								
5	Minneapolis Dow	MPLSMNDT	1	310	31%	686	69%	1	0%	57	1,054
6	Cedar	BLTNMNCE	2	12	11%	91	89%	0	0%	27	130
7	Normandale	BLTNMNNO	2	35	3%	1,191	97%	0	0%	20	1,247
8	Crystal	CRYSMNCR	2	22	4%	546	96%	0	0%	16	584
9	Orchard	GLVYMNOR	2	11	3%	404	97%	0	0%	100	515
10	Minneapolis 7th A	MPLSMNO7	2	22	3%	842	97%	0	0%	17	881
11	Minneapolis Fran	MPLSMNFR	2	30	16%	158	84%	0	0%	11	199
12	Fort Snelling	MPLSMNFS	2	8	27%	20	73%	0	0%	2	30
13	Beech	STPLMNBE	2	29	12%	207	88%	0	0%	7	244
14	Emerson	STPLMNEM	2	18	10%	160	90%	0	0%	8	185
15	Front	STPLMNH B	2	28	14%	169	86%	0	0%	11	208
16	Midway	STPLMNMI	2	23	4%	589	96%	0	0%	65	677
17	Market	STPLMNMK	2	41	4%	989	96%	0	0%	49	1,079
18	South	BLTNMNSO	3	22	5%	446	95%	0	0%	33	500
19	Fridley	FRDLMNFR	3	20	10%	192	90%	0	0%	11	223
20	Hopkins	HPKMNH O	3	44	7%	606	93%	1	0%	41	692
21	Minneapolis Bear	MPLSMNBE	3	48	4%	1,158	96%	1	0%	20	1,226
22	Central Avenue	MPLSMNGE	3	38	22%	133	77%	1	1%	9	180
23	Penn Avenue	MPLSMNPE	3	26	17%	132	83%	0	0%	3	161
24	Pillsbury Avenue	MPLSMNPI	3	45	20%	183	80%	0	0%	7	236
25	Minneapolis 24th	MPLSMNTF	3	29	7%	369	93%	1	0%	10	408
26	Maplewood	MPWDMNMA	3	51	8%	606	92%	0	0%	14	671
27	Cleveland	NWBTMNCL	3	29	9%	302	91%	0	0%	45	377
28	Minneapolis 66th	RCFDMN66	3	11	9%	115	91%	0	0%	14	140
29	Oakdale West	WSPLMNWS	3	50	18%	227	82%	0	0%	23	300
30	Afton	AFTNMNAF	4	14	64%	8	36%	0	0%	1	24
31	Anoka	ANOKMNAN	4	54	21%	202	79%	0	0%	36	293
32	Buffalo	BFLOMNBU	4	26	48%	28	52%	0	0%	11	65
33	Blaine	BLANMNBL	4	59	11%	457	89%	0	0%	34	550
34	Brooklyn Center	BRCTMNBC	4	12	9%	118	91%	0	0%	7	137
35	Braham	BRHMMNBR	4	0	0%	1	100%	0	0%	0	1
36	Burnsville-Qwest	BRVLMNBU	4	19	2%	941	98%	3	0%	51	1,014
37	Cambridge	CMBRMNCA	4	0	0%	4	100%	0	0%	0	4
38	Coon Rapids	CNRPMNND	4	32	16%	168	83%	3	1%	21	223
39	Cottage Grove	CTGVMNCG	4	12	10%	106	90%	0	0%	5	124
40	Lexington	EAGLMNLB	4	54	9%	524	91%	0	0%	117	695
41	Eden Prairie	EDPRMN EP	4	22	3%	651	97%	0	0%	66	740
42	Glen Prairie	EDPRMN GP	4	17	4%	434	96%	1	0%	11	464
43	Elk River	EKRVMNER	4	19	15%	106	85%	0	0%	0	125
44	Excelsior	EXCLMNEX	4	23	14%	138	86%	0	0%	8	168
45	Forest Lake	FRLKMNFL	4	21	12%	150	88%	0	0%	3	174
46	Hamel	HAMLMNHB	4	0	0%	23	96%	1	4%	0	24
47	Hanover	HNVRMNHB	4	5	63%	3	37%	0	0%	0	8
48	Isanti	ISNTMNIS	4	24	89%	3	11%	0	0%	0	26
49	Bryant	MPLSMNBB	4	19	12%	134	88%	0	0%	11	163
50	North Branch	NBRNMNNB	4	0	0%	14	100%	0	0%	3	17
51	Park Row	NSPLMNPR	4	45	17%	217	83%	0	0%	14	276
52	Navarre	NVRRMNNA	4	0	0%	36	100%	0	0%	0	36
53	Oak Grove	OKGVMNOG	4	19	28%	49	72%	0	0%	5	73
54	Plymouth Fernbr	PLMOMNFE	4	24	6%	368	94%	1	0%	33	426
55	Rockford	RCFRMNRO	4	15	89%	2	11%	0	0%	0	17
56	Rush City	RSCYMNRC	4	0	0%	4	100%	0	0%	3	7
57	Soderville	SDVLMNSO	4	25	48%	27	52%	0	0%	3	56
58	Shakopee	SHKPMNSH	4	15	3%	489	97%	0	0%	14	518
59	Rice Street	SHVWMNRI	4	34	8%	370	92%	0	0%	53	457
60	Stillwater	STWRMNST	4	19	9%	202	91%	0	0%	5	227
61	White Bear Lake	WBLKMNBW	4	40	11%	337	89%	0	0%	17	394
62	Wayzata	WYZTMNWA	4	20	6%	300	94%	0	0%	29	349
63	Total for 58 exchgs			1,688	9%	17,138	91%	14	0%	1,180	20,020
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Reported line counts by wire center for certain CLECs serving the Twin Cities MSA
Qwest Forbearance Case (Docket No. P421/CI-07-661)

	A	B	C	S	T	U	V	W	X	Y	Z
1	Customer Type			Mass Mkt	%	Mass Mkt	%	Mass Mkt	%	Mass Mkt	Mass Mkt
2	Method of Provision:			SpAc/ComAg		Q UNE		Resale		Unknown	Subtotal
3											
4	wire center	CLLI	zone								
5	Minneapolis Dow	MPLSMNDT	1	681	42%	881	55%	46	3%	57	1,665
6	Cedar	BLTNMNCE	2	230	60%	134	35%	21	5%	27	412
7	Normandale	BLTNMNNO	2	538	28%	1,370	71%	16	1%	20	1,944
8	Crystal	CRYSMNCR	2	661	43%	869	56%	12	1%	16	1,558
9	Orchard	GLVYMNOR	2	861	53%	686	42%	79	5%	100	1,727
10	Minneapolis 7th A	MPLSMN07	2	299	23%	993	76%	13	1%	17	1,322
11	Minneapolis Fran	MPLSMNFR	2	413	57%	307	42%	10	1%	11	740
12	Fort Snelling	MPLSMNFS	2	79	64%	42	35%	2	1%	2	125
13	Beech	STPLMNBE	2	1,020	65%	542	35%	6	0%	7	1,575
14	Emerson	STPLMNEM	2	458	47%	514	53%	6	1%	8	986
15	Front	STPLMNHB	2	609	59%	414	40%	8	1%	11	1,042
16	Midway	STPLMNMI	2	553	37%	905	60%	52	3%	65	1,574
17	Market	STPLMNMK	2	824	38%	1,283	60%	39	2%	49	2,195
18	South	BLTNMNSO	3	1,107	56%	838	43%	26	1%	33	2,004
19	Fridley	FRDLMNFR	3	463	54%	386	45%	10	1%	11	870
20	Hopkins	HPKMNHO	3	1,056	51%	1,000	48%	33	2%	41	2,130
21	Minneapolis Bear	MPLSMNBE	3	1,558	50%	1,545	50%	17	1%	20	3,139
22	Central Avenue	MPLSMNGE	3	759	63%	428	36%	9	1%	9	1,204
23	Penn Avenue	MPLSMNPE	3	347	61%	223	39%	3	0%	3	575
24	Pillsbury Avenue	MPLSMNPI	3	1,015	62%	599	37%	22	1%	7	1,644
25	Minneapolis 24th	MPLSMNTF	3	979	55%	771	43%	29	2%	10	1,788
26	Maplewood	MPWDMNMA	3	975	50%	952	49%	13	1%	14	1,953
27	Cleveland	NWBTMNCL	3	428	44%	505	52%	37	4%	45	1,015
28	Minneapolis 66th	RCFDMN66	3	996	70%	405	29%	12	1%	14	1,427
29	Oakdale West	WSPLMNWS	3	767	57%	552	41%	19	1%	23	1,360
30	Afton	AFTNMNAF	4	202	95%	9	4%	1	0%	1	213
31	Anoka	ANOKMNAN	4	935	55%	680	40%	80	5%	36	1,731
32	Buffalo	BFLOMNBU	4	507	80%	115	18%	8	1%	11	641
33	Blaine	BLANMNBL	4	1,086	56%	818	42%	27	1%	34	1,965
34	Brooklyn Center	BRCTMNBC	4	686	60%	454	40%	6	0%	7	1,152
35	Braham	BRHMMNBR	4	184	100%	1	0%	0	0%	0	185
36	Burnsville-Qwest	BRVLMNBU	4	676	37%	1,126	61%	43	2%	51	1,896
37	Cambridge	CMBRMNCA	4	353	99%	5	1%	0	0%	0	358
38	Coon Rapids	CNRPMNND	4	904	55%	699	43%	27	2%	21	1,652
39	Cottage Grove	CTGVMNCG	4	462	59%	317	41%	4	1%	5	789
40	Lexington	EAGMNLB	4	1,048	52%	882	43%	102	5%	117	2,150
41	Eden Prairie	EDPRMNPE	4	805	45%	938	52%	52	3%	66	1,862
42	Glen Prairie	EDPRMNGP	4	727	54%	605	45%	10	1%	11	1,353
43	Elk River	EKRVMNER	4	518	58%	366	41%	3	0%	0	887
44	Excelsior	EXCLMNEX	4	516	58%	368	41%	6	1%	8	898
45	Forest Lake	FRLKMNFL	4	367	54%	312	46%	2	0%	3	684
46	Hamel	HAMLMNHB	4	91	65%	49	35%	1	1%	0	141
47	Hanover	HNVRMNHB	4	49	92%	4	8%	0	0%	0	53
48	Isanti	ISNTMNIS	4	297	99%	3	1%	0	0%	0	300
49	Bryant	MPLSMNBB	4	1,219	75%	393	24%	10	1%	11	1,632
50	North Branch	NBRMNNB	4	284	73%	101	26%	2	1%	3	390
51	Park Row	NSPLMNPR	4	664	56%	517	43%	11	1%	14	1,207
52	Navarre	NVRRMNNA	4	80	66%	40	33%	0	0%	0	121
53	Oak Grove	OKGVMNOG	4	349	86%	54	13%	4	1%	5	411
54	Plymouth Fernbr	PLMOMNFE	4	442	41%	616	57%	27	3%	33	1,119
55	Rockford	RCFRMNRO	4	115	98%	2	2%	0	0%	0	118
56	Rush City	RSCVMNRC	4	151	96%	4	3%	2	1%	3	160
57	Soderville	SDVLMNSO	4	397	93%	28	7%	3	1%	3	431
58	Shakopee	SHKPMNSH	4	572	42%	777	57%	11	1%	14	1,374
59	Rice Street	SHVWMNRI	4	697	52%	602	45%	42	3%	53	1,393
60	Stillwater	STWRMNST	4	376	50%	370	49%	5	1%	5	757
61	White Bear Lake	WBLKMNWB	4	699	52%	622	47%	14	1%	17	1,352
62	Wayzata	WYZTMNWA	4	608	56%	464	42%	23	2%	29	1,124
63	Total for 58 exchs			34,746	53%	29,486	45%	1,064	2%	1,180	66,476
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Reported line counts by wire center for certain CLECs serving the Twin Cities MSA
Qwest Forbearance Case (Docket No. P421/CI-07-661)

	A	B	C	AA	AB	AC	AD	AE	AF	AG	AH	AI	AJ
1	Customer Type			Med B	%	Med B	%	Med B	%	Med B	%	Med B	Med B
2	Method of Provision:			Own		SpAc/ComAg		Q UNE		Resale		Unknown	Subtotal
3													
4	wire center	CLI	zone										
5	Minneapolis Dow	MPLSMNDT	1	1,584	13%	1,437	12%	7,093	60%	1,707	14%	1,579	13,400
6	Cedar	BLTNMNCE	2	0	0%	0	0%	1,079	100%	2	0%	743	1,824
7	Normandale	BLTNMNNO	2	456	6%	0	0%	7,465	94%	2	0%	566	8,490
8	Crystal	CRYSMNCR	2	48	1%	0	0%	4,802	98%	51	1%	436	5,337
9	Orchard	GLVYMNOR	2	336	5%	0	0%	7,033	95%	2	0%	2,781	10,153
10	Minneapolis 7th A	MPLSMN07	2	216	3%	0	0%	6,842	96%	51	1%	469	7,578
11	Minneapolis Fran	MPLSMNFR	2	240	16%	0	0%	1,268	84%	6	0%	304	1,819
12	Fort Snelling	MPLSMNFS	2	72	22%	0	0%	249	77%	2	1%	56	379
13	Beech	STPLMNBE	2	96	8%	0	0%	1,130	92%	0	0%	200	1,426
14	Emerson	STPLMNEM	2	0	0%	0	0%	902	100%	0	0%	214	1,116
15	Front	STPLMNHB	2	96	7%	0	0%	1,201	93%	0	0%	296	1,594
16	Midway	STPLMNMI	2	384	8%	0	0%	4,425	92%	3	0%	1,814	6,626
17	Market	STPLMNMK	2	120	1%	0	0%	8,677	99%	9	0%	1,355	10,161
18	South	BLTNMNNSO	3	24	1%	0	0%	3,145	99%	2	0%	911	4,082
19	Fridley	FRDLMNFR	3	24	1%	0	0%	1,751	99%	0	0%	315	2,090
20	Hopkins	HPKNMNHO	3	48	1%	0	0%	4,460	99%	3	0%	1,132	5,643
21	Minneapolis Bear	MPLSMNBE	3	216	3%	0	0%	7,570	97%	24	0%	548	8,358
22	Central Avenue	MPLSMNGE	3	24	2%	0	0%	949	98%	0	0%	238	1,211
23	Penn Avenue	MPLSMNPE	3	72	7%	0	0%	932	93%	0	0%	95	1,099
24	Pillsbury Avenue	MPLSMNPI	3	96	9%	0	0%	1,001	91%	6	1%	206	1,309
25	Minneapolis 24th	MPLSMNTF	3	192	7%	0	0%	2,458	93%	3	0%	269	2,922
26	Maplewood	MPWDMNMA	3	0	0%	0	0%	3,076	100%	0	0%	380	3,456
27	Cleveland	NWBTMNCL	3	720	17%	0	0%	3,435	83%	6	0%	1,250	5,411
28	Minneapolis 66th	RCFDMN66	3	0	0%	0	0%	697	100%	3	0%	385	1,085
29	Oakdale West	WSPLMNWS	3	0	0%	0	0%	2,164	100%	0	0%	628	2,793
30	Afton	AFTNMNAF	4	0	0%	0	0%	97	100%	0	0%	34	131
31	Anoka	ANOKMNAN	4	72	3%	0	0%	2,126	94%	57	3%	1,012	3,267
32	Buffalo	BFLOMNBU	4	72	16%	0	0%	389	84%	0	0%	299	760
33	Blaine	BLANMNBL	4	264	7%	0	0%	3,543	92%	65	2%	947	4,819
34	Brooklyn Center	BRCTMNBC	4	48	3%	0	0%	1,481	97%	1	0%	200	1,730
35	Braham	BRHMMNBR	4	0	-	0	-	0	-	0	-	0	0
36	Burnsville-Qwest	BRVLMNBU	4	144	3%	0	0%	4,744	96%	48	1%	1,414	6,350
37	Cambridge	CMBRMNCA	4	96	47%	0	0%	108	53%	0	0%	0	204
38	Coon Rapids	CNRPMNND	4	48	4%	0	0%	1,252	96%	0	0%	571	1,870
39	Cottage Grove	CTGVMNCG	4	24	3%	0	0%	777	94%	24	3%	153	978
40	Lexington	EAGNMNLB	4	312	6%	0	0%	4,875	94%	7	0%	3,246	8,440
41	Eden Prairie	EDPRMNPE	4	408	5%	0	0%	6,832	87%	576	7%	1,843	9,660
42	Glen Prairie	EDPRMNPG	4	336	10%	0	0%	3,038	90%	2	0%	314	3,690
43	Elk River	EKRVMNER	4	24	3%	0	0%	705	83%	120	14%	0	849
44	Excelsior	EXCLMNEX	4	0	0%	0	0%	945	100%	1	0%	218	1,164
45	Forest Lake	FRLKMNFL	4	24	3%	0	0%	798	94%	24	3%	82	928
46	Hamel	HAMLMNHB	4	0	0%	0	0%	202	100%	0	0%	8	210
47	Hanover	HNVRMNHB	4	0	0%	0	0%	76	100%	0	0%	6	82
48	Isanti	ISNTMNIS	4	0	0%	0	0%	26	100%	0	0%	0	26
49	Bryant	MPLSMNBB	4	96	6%	0	0%	1,505	93%	11	1%	303	1,915
50	North Branch	NBRNMNBB	4	0	0%	0	0%	11	100%	0	0%	78	89
51	Park Row	NSPLMNPR	4	72	5%	0	0%	1,491	95%	2	0%	393	1,957
52	Navarre	NVRRMNNA	4	0	0%	0	0%	723	86%	120	14%	10	853
53	Oak Grove	OKGVMNOG	4	0	0%	0	0%	389	100%	0	0%	128	517
54	Plymouth Fernbr	PLMOMNFE	4	432	8%	0	0%	4,639	89%	158	3%	929	6,158
55	Rockford	RCFRMNRO	4	0	0%	0	0%	100	100%	0	0%	7	107
56	Rush City	RSCYMNRC	4	0	0%	0	0%	49	100%	0	0%	70	119
57	Soderville	SDVLMNSO	4	24	5%	0	0%	440	95%	0	0%	94	558
58	Shakopee	SHKPMNSH	4	24	1%	0	0%	2,738	96%	97	3%	382	3,241
59	Rice Street	SHVWMNRI	4	24	1%	0	0%	2,216	99%	2	0%	1,464	3,706
60	Stillwater	STWRMNST	4	48	3%	0	0%	1,492	95%	24	2%	141	1,705
61	White Bear Lake	WBLKMNBW	4	48	2%	0	0%	2,614	97%	25	1%	475	3,162
62	Wayzata	WYZTMNWA	4	72	3%	0	0%	2,353	97%	4	0%	804	3,233
63	Total for 58 exchs			7,776	5%	1,437	1%	136,582	92%	3,250	2%	32,793	181,838
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Reported line counts by wire center for certain CLECs serving the Twin Cities MSA
Qwest Forbearance Case (Docket No. P421/CI-07-661)

	A	B	C	AK	AL	AM	AN	AO	AP	AQ	AR
1	Customer Type			Lg B	%	Lg B	%	Lg B	%	Lg B	Lg B
2	Method of Provision:			Own		Q UNE		Resale		Unknown	Subtotal
3											
4	wire center	CLLI	zone								
5	Minneapolis Dow	MPLSMNDT	1	2,016	39%	1,416	28%	1,680	33%	114	5,226
6	Cedar	BLTNMNCE	2	0	0%	93	100%	0	0%	54	146
7	Normandale	BLTNMNNO	2	672	91%	68	9%	0	0%	41	781
8	Crystal	CRYSMNCR	2	0	0%	115	100%	0	0%	31	147
9	Orchard	GLVYMNOR	2	0	0%	703	100%	0	0%	201	904
10	Minneapolis 7th A	MPLSMN07	2	1,344	80%	316	19%	24	1%	34	1,718
11	Minneapolis Fran	MPLSMNFR	2	0	0%	33	100%	0	0%	22	55
12	Fort Snelling	MPLSMNFS	2	0	0%	166	100%	0	0%	4	170
13	Beech	STPLMNBE	2	0	0%	106	100%	0	0%	14	120
14	Emerson	STPLMNEM	2	2,344	98%	42	2%	0	0%	15	2,401
15	Front	STPLMNH	2	0	0%	55	100%	0	0%	21	77
16	Midway	STPLMNMI	2	6,250	95%	362	5%	0	0%	131	6,743
17	Market	STPLMNMK	2	0	0%	352	100%	0	0%	98	450
18	South	BLTNMNNSO	3	0	0%	183	100%	0	0%	66	249
19	Fridley	FRDLMNFR	3	0	0%	84	100%	0	0%	23	107
20	Hopkins	HPKMNHNO	3	0	0%	383	100%	0	0%	82	465
21	Minneapolis Bear	MPLSMNBE	3	0	0%	702	100%	3	0%	40	745
22	Central Avenue	MPLSMNGE	3	0	0%	58	100%	0	0%	17	75
23	Penn Avenue	MPLSMNPE	3	0	0%	41	100%	0	0%	7	48
24	Pillsbury Avenue	MPLSMNPI	3	0	0%	43	92%	4	8%	15	62
25	Minneapolis 24th	MPLSMNTF	3	0	0%	74	100%	0	0%	19	93
26	Maplewood	MPWDMNMA	3	0	0%	149	100%	0	0%	27	176
27	Cleveland	NWBTMNCL	3	2,734	91%	286	9%	0	0%	90	3,111
28	Minneapolis 66th	RCFDMN66	3	0	0%	54	100%	0	0%	28	82
29	Oakdale West	WSPLMNWS	3	0	0%	389	100%	0	0%	45	434
30	Afton	AFTNMNAF	4	0	0%	12	100%	0	0%	2	14
31	Anoka	ANOKMNAN	4	0	0%	293	93%	22	7%	73	388
32	Buffalo	BFLOMNBU	4	0	0%	10	100%	0	0%	22	32
33	Blaine	BLANMNBL	4	0	0%	162	81%	37	19%	68	267
34	Brooklyn Center	BRCTMNBC	4	0	0%	113	100%	0	0%	14	127
35	Braham	BRHMNBR	4	0	-	0	-	0	-	0	0
36	Burnsville-Qwest	BRVLMNBU	4	672	88%	95	12%	0	0%	102	869
37	Cambridge	CMBRMNCA	4	0	0%	1	100%	0	0%	0	1
38	Coon Rapids	CNRPMNND	4	0	0%	355	100%	1	0%	41	397
39	Cottage Grove	CTGVMNCG	4	0	0%	31	100%	0	0%	11	42
40	Lexington	EAGNMNLB	4	672	64%	362	34%	21	2%	234	1,290
41	Eden Prairie	EDPRMNPE	4	0	0%	390	100%	0	0%	133	523
42	Glen Prairie	EDPRMNPG	4	0	0%	76	100%	0	0%	23	98
43	Elk River	EKRVMNER	4	0	0%	28	100%	0	0%	0	28
44	Excelsior	EXCLMNEX	4	0	0%	90	100%	0	0%	16	106
45	Forest Lake	FRLKMNFL	4	0	0%	37	62%	22	38%	6	64
46	Hamel	HAMLMNHB	4	0	0%	18	100%	0	0%	1	18
47	Hanover	HNVRMNHB	4	0	0%	40	100%	0	0%	0	40
48	Isanti	ISNTMNIS	4	0	-	0	-	0	-	0	0
49	Bryant	MPLSMNBB	4	0	0%	51	100%	0	0%	22	72
50	North Branch	NBRNMNBN	4	0	0%	5	100%	0	0%	6	11
51	Park Row	NSPLMNPR	4	0	0%	181	100%	0	0%	28	209
52	Navarre	NVRRMNNA	4	0	0%	10	100%	0	0%	1	11
53	Oak Grove	OKGVMNOG	4	0	0%	69	100%	0	0%	9	78
54	Plymouth Fernbr	PLMOMNFE	4	672	70%	283	30%	0	0%	67	1,022
55	Rockford	RCFRMNRO	4	0	-	0	-	0	-	1	1
56	Rush City	RSCYMNR	4	0	-	0	-	0	-	5	5
57	Soderville	SDVLMNSO	4	0	0%	18	100%	0	0%	7	24
58	Shakopee	SHKPMNSH	4	0	0%	96	100%	0	0%	28	124
59	Rice Street	SHVWMNRI	4	1,344	90%	134	9%	17	1%	106	1,600
60	Stillwater	STWRMNST	4	0	0%	47	84%	9	16%	10	66
61	White Bear Lake	WBLKMNB	4	0	0%	123	100%	0	0%	34	157
62	Wayzata	WYZTMNWA	4	0	0%	219	100%	0	0%	58	277
63	Total for 58 exchgs			18,720	62%	9,619	32%	1,840	6%	2,366	32,545
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Reported line counts by wire center for certain CLECs serving the Twin Cities MSA
Qwest Forbearance Case (Docket No. P421/CI-07-661)

	A	B	C	AS	AT	AU	AV	AW	AX	AY	AZ	BA
1	Customer Type			Med/Lg	%	Med/Lg	%	Med/Lg	%	Med/Lg	%	Med/Lg
2	Method of Provision:			Own		SpA/ComA		Q UNE		CLEC		Subtotal
3												
4	wire center	CLLI	zone									
5	Minneapolis Dow	MPLSMNDT	1	74,559	95%	2,268	3%	1,007	1%	587	1%	78,420
6	Cedar	BLTNMNCE	2	0	0%	355	84%	70	16%	0	0%	425
7	Normandale	BLTNMNNO	2	0	0%	388	50%	387	50%	0	0%	774
8	Crystal	CRYSMNCR	2	0	0%	87	40%	132	60%	0	0%	219
9	Orchard	GLVYMNOR	2	0	0%	2,414	69%	324	9%	773	22%	3,511
10	Minneapolis 7th A	MPLSMN07	2	0	0%	370	95%	20	5%	0	0%	390
11	Minneapolis Fran	MPLSMNFR	2	0	0%	12	24%	38	76%	0	0%	50
12	Fort Snelling	MPLSMNFS	2	0	0%	791	98%	18	2%	0	0%	808
13	Beech	STPLMNBE	2	0	0%	21	100%	0	0%	0	0%	21
14	Emerson	STPLMNEM	2	0	0%	58	41%	85	59%	0	0%	144
15	Front	STPLMNH B	2	0	0%	0	0%	16	100%	0	0%	16
16	Midway	STPLMNMI	2	0	0%	130	8%	1,593	92%	0	0%	1,722
17	Market	STPLMNMK	2	0	0%	279	52%	230	43%	24	5%	533
18	South	BLTNMNNSO	3	0	0%	378	74%	134	26%	0	0%	512
19	Fridley	FRDLMNFR	3	0	0%	98	76%	30	24%	0	0%	128
20	Hopkins	HPKNMNH O	3	0	0%	1,108	85%	198	15%	0	0%	1,306
21	Minneapolis Bear	MPLSMNBE	3	0	0%	278	60%	186	40%	0	0%	463
22	Central Avenue	MPLSMNGE	3	0	0%	120	83%	25	17%	0	0%	145
23	Penn Avenue	MPLSMNPE	3	0	-	0	-	0	-	0	-	0
24	Pillsbury Avenue	MPLSMNPI	3	0	0%	10	37%	17	63%	0	0%	27
25	Minneapolis 24th	MPLSMNTF	3	0	0%	0	0%	25	96%	1	4%	26
26	Maplewood	MPWDMNMA	3	0	0%	404	80%	100	20%	0	0%	504
27	Cleveland	NWBTMNCL	3	263	25%	510	48%	297	28%	0	0%	1,070
28	Minneapolis 66th	RCFDMN66	3	0	0%	208	87%	30	13%	0	0%	238
29	Oakdale West	WSPLMNWS	3	0	0%	105	66%	54	34%	0	0%	160
30	Afton	AFTNMNAF	4	0	0%	11	100%	0	0%	0	0%	11
31	Anoka	ANOKMNAN	4	0	0%	136	50%	135	50%	0	0%	272
32	Buffalo	BFLOMNBU	4	0	0%	351	99%	5	1%	0	0%	357
33	Blaine	BLANMNBL	4	0	0%	387	84%	74	16%	0	0%	461
34	Brooklyn Center	BRCTMNBC	4	0	0%	290	86%	49	14%	0	0%	339
35	Braham	BRHMNBR	4	0	-	0	-	0	-	0	-	0
36	Burnsville-Qwest	BRVLMNBU	4	0	0%	239	56%	186	44%	0	0%	425
37	Cambridge	CMBRMNCA	4	0	-	0	-	0	-	0	-	0
38	Coon Rapids	CNRPMNND	4	0	0%	46	75%	16	25%	0	0%	62
39	Cottage Grove	CTGVMNCG	4	0	0%	34	82%	7	18%	0	0%	41
40	Lexington	EAGMNLB	4	0	0%	1,471	94%	101	6%	0	0%	1,572
41	Eden Prairie	EDPRMNEP	4	0	0%	977	74%	348	26%	0	0%	1,326
42	Glen Prairie	EDPRMN GP	4	0	0%	51	86%	8	14%	0	0%	59
43	Elk River	EKRVMNER	4	0	0%	57	100%	0	0%	0	0%	57
44	Excelsior	EXCLMNEX	4	0	0%	41	100%	0	0%	0	0%	41
45	Forest Lake	FRLKMNFL	4	0	0%	29	100%	0	0%	0	0%	29
46	Hamel	HAMLMNHB	4	0	0%	11	100%	0	0%	0	0%	11
47	Hanover	HNVRMNHB	4	0	-	0	-	0	-	0	-	0
48	Isanti	ISNTMNIS	4	0	-	0	-	0	-	0	-	0
49	Bryant	MPLSMNBB	4	0	0%	37	38%	61	62%	0	0%	99
50	North Branch	NBRNMNBE	4	0	-	0	-	0	-	0	-	0
51	Park Row	NSPLMNPR	4	0	0%	187	80%	46	20%	0	0%	233
52	Navarre	NVRRMNNA	4	0	-	0	-	0	-	0	-	0
53	Oak Grove	OKGVMNOG	4	0	-	0	-	0	-	0	-	0
54	Plymouth Fernbr	PLMOMNFE	4	0	0%	954	84%	176	16%	0	0%	1,131
55	Rockford	RCFRMNRO	4	0	-	0	-	0	-	0	-	0
56	Rush City	RSCVMNRC	4	0	-	0	-	0	-	0	-	0
57	Soderville	SDVLMNSO	4	0	0%	26	100%	0	0%	0	0%	26
58	Shakopee	SHKPMNSH	4	0	0%	136	81%	31	19%	0	0%	167
59	Rice Street	SHVWMNRI	4	0	0%	964	94%	64	6%	0	0%	1,028
60	Stillwater	STWRMNST	4	0	0%	30	85%	5	15%	0	0%	35
61	White Bear Lake	WBLKMNBW	4	0	0%	87	57%	65	43%	0	0%	151
62	Wayzata	WYZTMNWA	4	0	0%	131	64%	74	36%	0	0%	205
63	Total for 58 exchgs			74,822	75%	17,073	17%	6,467	6%	1,385	1%	99,747
64												

Reported line counts by wire center for certain CLECs serving the Twin Cities MSA
Qwest Forbearance Case (Docket No. P421/CI-07-661)

	A	B	C	BB	BC	BD	BE	BF	BG	BH	BI	BJ	BK	BL	BM
1	Customer Type			Enterprise	%	Enterprise	%	Enterprise	%	Enterprise	%	Enterprise	%	Enterprise	Enterprise
2	Method of Provision:			Own		CLEC		SpAc/ComAg		Q UNE		Resale		Unknown	Subtotal
3															
4	wire center	CLLI	zone												
5	Minneapolis Dow	MPLSMNDT	1	78,159	82%	587	1%	3,705	4%	9,516	10%	3,387	4%	1,693	97,046
6	Cedar	BLTNMNCE	2	0	0%	0	0%	355	22%	1,242	78%	2	0%	797	2,395
7	Normandale	BLTNMNNO	2	1,128	12%	0	0%	388	4%	7,920	84%	2	0%	607	10,045
8	Crystal	CRYSMNCR	2	48	1%	0	0%	87	2%	5,050	96%	51	1%	467	5,703
9	Orchard	GLVYMNOR	2	336	3%	773	7%	2,414	21%	8,061	70%	2	0%	2,982	14,568
10	Minneapolis 7th A	MPLSMN07	2	1,560	17%	0	0%	370	4%	7,178	78%	75	1%	503	9,686
11	Minneapolis Fran	MPLSMNFR	2	240	15%	0	0%	12	1%	1,339	84%	6	0%	326	1,923
12	Fort Snelling	MPLSMNFS	2	72	6%	0	0%	791	61%	433	33%	2	0%	60	1,358
13	Beech	STPLMNBE	2	96	7%	0	0%	21	2%	1,236	91%	0	0%	214	1,567
14	Emerson	STPLMNEM	2	2,344	68%	0	0%	58	2%	1,030	30%	0	0%	229	3,661
15	Front	STPLMNHB	2	96	7%	0	0%	0	0%	1,272	93%	0	0%	318	1,686
16	Midway	STPLMNMI	2	6,634	50%	0	0%	130	1%	6,380	49%	3	0%	1,945	15,091
17	Market	STPLMNMK	2	120	1%	24	0%	279	3%	9,259	96%	9	0%	1,453	11,144
18	South	BLTNMNNO	3	24	1%	0	0%	378	10%	3,463	90%	2	0%	976	4,843
19	Fridley	FRDLMNFR	3	24	1%	0	0%	98	5%	1,866	94%	0	0%	337	2,325
20	Hopkins	HPKMNHNO	3	48	1%	0	0%	1,108	18%	5,041	81%	3	0%	1,213	7,414
21	Minneapolis Bear	MPLSMNBE	3	216	2%	0	0%	278	3%	8,458	94%	27	0%	587	9,566
22	Central Avenue	MPLSMNGE	3	24	2%	0	0%	120	10%	1,032	88%	0	0%	256	1,431
23	Penn Avenue	MPLSMNPE	3	72	7%	0	0%	0	0%	973	93%	0	0%	101	1,147
24	Pillsbury Avenue	MPLSMNPI	3	96	8%	0	0%	10	1%	1,061	90%	10	1%	221	1,398
25	Minneapolis 24th	MPLSMNTF	3	192	7%	1	0%	0	0%	2,557	93%	3	0%	289	3,042
26	Maplewood	MPWDMNMA	3	0	0%	0	0%	404	11%	3,325	89%	0	0%	408	4,137
27	Cleveland	NWBTMNCL	3	3,717	45%	0	0%	510	6%	4,018	49%	6	0%	1,340	9,591
28	Minneapolis 66th	RCFDMN66	3	0	0%	0	0%	208	21%	781	79%	3	0%	413	1,404
29	Oakdale West	WSPLMNWS	3	0	0%	0	0%	105	4%	2,607	96%	0	0%	674	3,386
30	Afton	AFTNMNAF	4	0	0%	0	0%	11	9%	109	91%	0	0%	37	156
31	Anoka	ANOKMNAN	4	72	3%	0	0%	136	5%	2,554	90%	79	3%	1,085	3,926
32	Buffalo	BFLOMNBU	4	72	9%	0	0%	351	42%	405	49%	0	0%	320	1,148
33	Blaine	BLANMNBL	4	264	6%	0	0%	387	9%	3,779	83%	102	2%	1,015	5,547
34	Brooklyn Center	BRCTMNBC	4	48	2%	0	0%	290	15%	1,643	83%	1	0%	214	2,196
35	Braham	BRHMNBR	4	0	-	0	-	0	-	0	-	0	-	0	0
36	Burnsville-Qwest	BRVLMNBU	4	816	13%	0	0%	239	4%	5,025	82%	48	1%	1,516	7,644
37	Cambridge	CMBRMNCA	4	96	47%	0	0%	0	0%	109	53%	0	0%	0	205
38	Coon Rapids	CNRPMNND	4	48	3%	0	0%	46	3%	1,622	94%	1	0%	612	2,329
39	Cottage Grove	CTGVMNCG	4	24	3%	0	0%	34	4%	815	91%	24	3%	164	1,061
40	Lexington	EAGNMNLB	4	984	13%	0	0%	1,471	19%	5,339	68%	28	0%	3,480	11,302
41	Eden Prairie	EDPRMNBP	4	408	4%	0	0%	977	10%	7,570	79%	576	6%	1,976	11,508
42	Glen Prairie	EDPRMNGP	4	336	10%	0	0%	51	1%	3,122	89%	2	0%	336	3,847
43	Elk River	EKRVMNER	4	24	3%	0	0%	57	6%	733	78%	120	13%	0	934
44	Excelsior	EXCLMNEX	4	0	0%	0	0%	41	4%	1,035	96%	1	0%	234	1,310
45	Forest Lake	FRLKMNFL	4	24	3%	0	0%	29	3%	835	89%	46	5%	87	1,021
46	Hamel	HAMLMNHB	4	0	0%	0	0%	11	5%	220	95%	0	0%	8	240
47	Hanover	HNVRMNHB	4	0	0%	0	0%	0	0%	115	100%	0	0%	7	122
48	Isanti	ISNTMNIS	4	0	0%	0	0%	0	0%	26	100%	0	0%	0	26
49	Bryant	MPLSMNBB	4	96	5%	0	0%	37	2%	1,617	92%	11	1%	325	2,087
50	North Branch	NBRNMNNB	4	0	0%	0	0%	0	0%	16	100%	0	0%	84	100
51	Park Row	NSPLMNPR	4	72	4%	0	0%	187	9%	1,717	87%	2	0%	421	2,399
52	Navarre	NVRRMNNA	4	0	0%	0	0%	0	0%	733	86%	120	14%	10	863
53	Oak Grove	OKGVMNOG	4	0	0%	0	0%	0	0%	458	100%	0	0%	137	595
54	Plymouth Fernbr	PLMOMNFE	4	1,104	15%	0	0%	954	13%	5,098	70%	158	2%	996	8,311
55	Rockford	RCFRMNRO	4	0	0%	0	0%	0	0%	100	100%	0	0%	8	108
56	Rush City	RSCVMNRC	4	0	0%	0	0%	0	0%	49	100%	0	0%	75	125
57	Soderville	SDVLMNSO	4	24	5%	0	0%	26	5%	457	90%	0	0%	101	608
58	Shakopee	SHKPMNSH	4	24	1%	0	0%	136	4%	2,865	92%	97	3%	410	3,532
59	Rice Street	SHVWMNRI	4	1,368	29%	0	0%	964	20%	2,413	51%	19	0%	1,569	6,334
60	Stillwater	STWRMNST	4	48	3%	0	0%	30	2%	1,544	93%	33	2%	151	1,806
61	White Bear Lake	WBLKMNWB	4	48	2%	0	0%	87	3%	2,802	95%	25	1%	509	3,471
62	Wayzata	WYZTMNWA	4	72	3%	0	0%	131	5%	2,647	93%	4	0%	862	3,715
63	Total for 58 exchs			101,318		1,385		18,510		152,668		5,090		35,159	314,130
64															

Reported line counts by wire center for certain CLECs serving the Twin Cities MSA
Qwest Forbearance Case (Docket No. P421/CI-07-661)

	A	B	C	BN	BO	BP	BQ	BR	BS	BT	BU	BV	BW	BX	BY	BZ
1	Customer Type			Total	%	Total	%	Total	%	Total	%	Total	%	Total	Grand	
2	Method of Provision:			Own		CLEC		SpAc/ComAg		Q. UNE		Resale		Unknown	Total	
3																
4	wire center	CLLI	zone													
5	Minneapolis Dow	MPLSMNDT	1	78,159	81%	587	1%	4,386	5%	10,397	11%	3,433	4%	1,749	98,711	
6	Cedar	BLTNMNCE	2	0	0%	0	0%	585	29%	1,376	69%	23	1%	824	2,807	
7	Normandale	BLTNMNNO	2	1,128	10%	0	0%	926	8%	9,289	82%	18	0%	627	11,989	
8	Crystal	CRYSMNCR	2	48	1%	0	0%	748	11%	5,918	87%	63	1%	483	7,261	
9	Orchard	GLVYMNOR	2	336	3%	773	6%	3,275	25%	8,747	66%	81	1%	3,082	16,294	
10	Minneapolis 7th A	MPLSMN07	2	1,560	15%	0	0%	669	6%	8,171	78%	88	1%	520	11,008	
11	Minneapolis Fran	MPLSMNFR	2	240	10%	0	0%	425	18%	1,646	71%	16	1%	337	2,663	
12	Fort Snelling	MPLSMNFS	2	72	5%	0	0%	869	61%	475	33%	4	0%	62	1,482	
13	Beech	STPLMNBE	2	96	3%	0	0%	1,041	36%	1,778	61%	6	0%	221	3,142	
14	Emerson	STPLMNEM	2	2,344	53%	0	0%	517	12%	1,544	35%	6	0%	237	4,648	
15	Front	STPLMNHB	2	96	4%	0	0%	609	25%	1,686	70%	8	0%	328	2,728	
16	Midway	STPLMNMI	2	6,634	45%	0	0%	682	5%	7,284	50%	55	0%	2,011	16,666	
17	Market	STPLMNMK	2	120	1%	24	0%	1,103	9%	10,542	89%	48	0%	1,502	13,339	
18	South	BLTNMNNO	3	24	0%	0	0%	1,485	25%	4,300	74%	28	0%	1,009	6,847	
19	Fridley	FRDLMNFR	3	24	1%	0	0%	561	20%	2,251	79%	10	0%	349	3,194	
20	Hopkins	HPKNMNHO	3	48	1%	0	0%	2,165	26%	6,041	73%	36	0%	1,254	9,544	
21	Minneapolis Bear	MPLSMNBE	3	216	2%	0	0%	1,836	15%	10,003	83%	44	0%	607	12,705	
22	Central Avenue	MPLSMNGE	3	24	1%	0	0%	879	37%	1,460	62%	9	0%	264	2,636	
23	Penn Avenue	MPLSMNPE	3	72	4%	0	0%	347	21%	1,196	74%	3	0%	105	1,722	
24	Pillsbury Avenue	MPLSMNPI	3	96	3%	0	0%	1,025	36%	1,660	59%	32	1%	228	3,041	
25	Minneapolis 24th	MPLSMNTF	3	192	4%	1	0%	979	22%	3,328	73%	32	1%	298	4,830	
26	Maplewood	MPWDMNMA	3	0	0%	0	0%	1,379	24%	4,276	75%	13	0%	422	6,090	
27	Cleveland	NWBTMNCL	3	3,717	40%	0	0%	938	10%	4,523	49%	43	0%	1,385	10,606	
28	Minneapolis 66th	RCFDMN66	3	0	0%	0	0%	1,204	50%	1,187	49%	15	1%	426	2,832	
29	Oakdale West	WSPLMNWS	3	0	0%	0	0%	873	22%	3,159	78%	19	0%	696	4,747	
30	Afton	AFTNMNAF	4	0	0%	0	0%	213	64%	117	35%	1	0%	38	369	
31	Anoka	ANOKMNAN	4	72	2%	0	0%	1,072	24%	3,234	71%	159	3%	1,121	5,657	
32	Buffalo	BFLOMNBU	4	72	5%	0	0%	858	59%	519	36%	8	1%	331	1,790	
33	Blaine	BLANMNBL	4	264	4%	0	0%	1,473	23%	4,597	71%	129	2%	1,049	7,512	
34	Brooklyn Center	BRCTMNBC	4	48	2%	0	0%	976	31%	2,097	67%	7	0%	221	3,349	
35	Braham	BRHMMNBR	4	0	0%	0	0%	184	100%	1	0%	0	0%	0	185	
36	Burnsville-Qwest	BRVLMNBU	4	816	10%	0	0%	915	11%	6,150	77%	91	1%	1,567	9,540	
37	Cambridge	CMBRMNCA	4	96	17%	0	0%	353	63%	114	20%	0	0%	0	564	
38	Coon Rapids	CNRPMNND	4	48	1%	0	0%	950	28%	2,321	69%	28	1%	632	3,980	
39	Cottage Grove	CTGVMNCG	4	24	1%	0	0%	496	29%	1,133	67%	28	2%	169	1,850	
40	Lexington	EAGNMNLB	4	984	10%	0	0%	2,519	26%	6,221	63%	130	1%	3,597	13,451	
41	Eden Prairie	EDPRMNPE	4	408	4%	0	0%	1,782	16%	8,508	75%	628	6%	2,043	13,370	
42	Glen Prairie	EDPRMNPG	4	336	7%	0	0%	778	16%	3,727	77%	12	0%	348	5,200	
43	Elk River	EKRVMNER	4	24	1%	0	0%	575	32%	1,099	60%	123	7%	0	1,821	
44	Excelsior	EXCLMNEX	4	0	0%	0	0%	557	28%	1,403	71%	7	0%	242	2,209	
45	Forest Lake	FRLKMNFL	4	24	1%	0	0%	396	25%	1,147	71%	48	3%	90	1,705	
46	Hamel	HAMLMNHB	4	0	0%	0	0%	102	27%	269	72%	1	0%	9	381	
47	Hanover	HNVRMNHB	4	0	0%	0	0%	49	29%	120	71%	0	0%	17	175	
48	Isanti	ISNTMNIS	4	0	0%	0	0%	297	91%	29	9%	0	0%	0	325	
49	Bryant	MPLSMNBB	4	96	3%	0	0%	1,256	37%	2,010	59%	21	1%	336	3,719	
50	North Branch	NBRMNBNB	4	0	0%	0	0%	284	71%	117	29%	2	1%	86	489	
51	Park Row	NSPLMNPR	4	72	2%	0	0%	851	27%	2,235	70%	13	0%	435	3,606	
52	Navarre	NVRRMNNA	4	0	0%	0	0%	80	8%	773	79%	120	12%	11	984	
53	Oak Grove	OKGVMNOG	4	0	0%	0	0%	349	40%	512	59%	4	0%	142	1,006	
54	Plymouth Fernbr	PLMOMNFE	4	1,104	13%	0	0%	1,397	17%	5,714	68%	185	2%	1,030	9,430	
55	Rockford	RCFRMNRO	4	0	0%	0	0%	115	53%	102	47%	0	0%	8	226	
56	Rush City	RSCVMNRC	4	0	0%	0	0%	151	73%	54	26%	2	1%	78	285	
57	Soderville	SDVLMNSO	4	24	3%	0	0%	423	45%	486	52%	3	0%	104	1,040	
58	Shakopee	SHKPMNSH	4	24	1%	0	0%	709	16%	3,642	81%	108	2%	423	4,906	
59	Rice Street	SHVVMNRI	4	1,368	22%	0	0%	1,661	27%	3,016	49%	61	1%	1,622	7,727	
60	Stillwater	STWRMNST	4	48	2%	0	0%	406	17%	1,914	80%	38	2%	156	2,562	
61	White Bear Lake	WBLKMNWB	4	48	1%	0	0%	786	18%	3,424	80%	39	1%	526	4,822	
62	Wayzata	WYZTMNWA	4	72	2%	0	0%	739	19%	3,111	79%	27	1%	891	4,839	
63	Total for 58 exchs			101,318		1,385		53,256		182,154		6,154		36,339	380,606	
64																

Reported line counts by wire center for certain CLECs serving the Twin Cities MSA
 Qwest Forbearance Case (Docket No. P421/CI-07-661)

	A	B	C	D	E	F	G	H	I	J
1	Customer Type			Res	%	Res	%	Res	%	Res
2	Method of Provision:			SpAc/ComAg		Q UNE		Resale		Subtotal
3										
65	UNE zones									
66	zone 1			372	61%	195	32%	45	7%	612
67	zone 2			6,267	68%	2,693	29%	264	3%	9,223
68	zone 3			10,038	72%	3,734	27%	224	2%	13,996
69	zone 4			16,381	72%	5,726	25%	518	2%	22,625
70	Total			33,058	71%	12,348	27%	1,050	2%	46,456
71										
72				The UNE zones are the zones approved by the Commission for						
73				geographically deaveraged UNE loop prices.						
74				Percentages are of the lines excluding lines with unknown method of provision.						
75										

Reported line counts by wire center for certain CLECs serving the Twin Cities MSA
 Qwest Forbearance Case (Docket No. P421/CI-07-661)

	A	B	C	K	L	M	N	O	P	Q	R
1	Customer Type			Sm B	%	Sm B	%	Sm B	%	Sm B	Sm B
2	Method of Provision:			SpAc/ComAg		Q UNE		Resale		Unknown	Subtotal
3											
65	UNE zones										
66	zone 1			310	31%	686	69%	1	0%	57	1,054
67	zone 2			279	5%	5,366	95%	0	0%	332	5,977
68	zone 3			413	8%	4,468	91%	4	0%	229	5,114
69	zone 4			686	9%	6,618	90%	9	0%	562	7,875
70	Total			1,688	9%	17,138	91%	14	0%	1,180	20,020
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Reported line counts by wire center for certain CLECs serving the Twin Cities MSA
 Qwest Forbearance Case (Docket No. P421/CI-07-661)

	A	B	C	S	T	U	V	W	X	Y	Z
1	Customer Type			Mass Mkt	%	Mass Mkt	%	Mass Mkt	%	Mass Mkt	Mass Mkt
2	Method of Provision:			SpAc/ComAg		Q UNE		Resale		Unknown	Subtotal
3											
65	UNE zones										
66	zone 1			681	42%	881	55%	46	3%	57	1,665
67	zone 2			6,545	44%	8,059	54%	264	2%	332	15,200
68	zone 3			10,451	55%	8,202	43%	228	1%	229	19,110
69	zone 4			17,068	57%	12,344	41%	527	2%	562	30,501
70	Total			34,746	53%	29,486	45%	1,064	2%	1,180	66,476
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Reported line counts by wire center for certain CLECs serving the Twin Cities MSA
 Qwest Forbearance Case (Docket No. P421/CI-07-661)

	A	B	C	AA	AB	AC	AD	AE	AF	AG	AH	AI	AJ
1	Customer Type			Med B	%	Med B	%	Med B	%	Med B	%	Med B	Med B
2	Method of Provision:			Own		SpAc/ComAg		Q UNE		Resale		Unknown	Subtotal
3													
65	UNE zones												
66	zone 1			1,584	13%	1,437	12%	7,093	60%	1,707	14%	1,579	13,400
67	zone 2			2,064	4%	0	0%	45,075	95%	128	0%	9,235	56,502
68	zone 3			1,416	4%	0	0%	31,639	96%	47	0%	6,357	39,459
69	zone 4			2,712	5%	0	0%	52,775	93%	1,368	2%	15,623	72,477
70	Total			7,776	5%	1,437	1%	136,582	92%	3,250	2%	32,793	181,838
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Reported line counts by wire center for certain CLECs serving the Twin Cities MSA
 Qwest Forbearance Case (Docket No. P421/CI-07-661)

	A	B	C	AK	AL	AM	AN	AO	AP	AQ	AR
1	Customer Type			Lg B	%	Lg B	%	Lg B	%	Lg B	Lg B
2	Method of Provision:			Own		Q UNE		Resale		Unknown	Subtotal
3											
65	UNE zones										
66	zone 1			2,016	39%	1,416	28%	1,680	33%	114	5,226
67	zone 2			10,610	81%	2,412	18%	24	0%	666	13,712
68	zone 3			2,734	53%	2,446	47%	7	0%	459	5,646
69	zone 4			3,360	49%	3,345	49%	129	2%	1,127	7,962
70	Total			18,720	62%	9,619	32%	1,840	6%	2,366	32,545
71											
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73											
74											
75											

Reported line counts by wire center for certain CLECs serving the Twin Cities MSA
 Qwest Forbearance Case (Docket No. P421/CI-07-661)

	A	B	C	AS	AT	AU	AV	AW	AX	AY	AZ	BA
1	Customer Type			Med/Lg	%	Med/Lg	%	Med/Lg	%	Med/Lg	%	Med/Lg
2	Method of Provision:			Own		SpA/ComA		Q UNE		CLEC		Subtotal
3												
65	UNE zones											
66	zone 1			74,559	95%	2,268	3%	1,007	1%	587	1%	78,420
67	zone 2			0	0%	4,904	57%	2,912	34%	797	9%	8,613
68	zone 3			263	6%	3,218	70%	1,096	24%	1	0%	4,579
69	zone 4			0	0%	6,683	82%	1,452	18%	0	0%	8,135
70	Total			74,822	75%	17,073	17%	6,467	6%	1,385	1%	99,747
71												
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73												
74												
75												

Reported line counts by wire center for certain CLECs serving the Twin Cities MSA
 Qwest Forbearance Case (Docket No. P421/CI-07-661)

	A	B	C	BB	BC	BD	BE	BF	BG	BH	BI	BJ	BK	BL	BM
1	Customer Type			Enterprise	%	Enterprise	Enterprise								
2	Method of Provision:			Own		CLEC		SpAc/ComAg		Q UNE		Resale		Unknown	Subtotal
3															
65	UNE zones														
66	zone 1			78,159		587		3,705		9,516		3,387		1,693	97,046
67	zone 2			12,674		797		4,904		50,398		152		9,902	78,827
68	zone 3			4,413		1		3,218		35,182		54		6,815	49,683
69	zone 4			6,072		0		6,683		57,572		1,497		16,750	88,574
70	Total			101,318		1,385		18,510		152,668		5,090		35,159	314,130
71															
72															
73															
74															
75															

Reported line counts by wire center for certain CLECs serving the Twin Cities MSA
 Qwest Forbearance Case (Docket No. P421/CI-07-661)

	A	B	C	BN	BO	BP	BQ	BR	BS	BT	BU	BV	BW	BX	BY	BZ
1	Customer Type			Total	%	Total	%	Total	%	Total	%	Total	%	Total	Grand	
2	Method of Provision:			Own		CLEC		SpAc/ComAg		Q. UNE		Resale		Unknown	Total	
3																
65	UNE zones															
66	zone 1			78,159		587		4,386		10,397		3,433		1,749	98,711	
67	zone 2			12,674		797		11,449		58,457		416		10,234	94,027	
68	zone 3			4,413		1		13,669		43,384		282		7,044	68,793	
69	zone 4			6,072		0		23,751		69,916		2,024		17,312	119,075	
70	Total			101,318		1,385		53,256		182,154		6,154		36,339	380,606	
71																
72																
73																
74																
75																

Line counts and percentages by Method of Provision and by wire center for certain CLECs
Qwest Forbearance Case (Docket No. P421/CI-07-661)

	A	B	C	D	E	F	G	H	I
1					% of WC		% of WC		% of WC
2	Customer Type			Res	total	Sm B	total	Mass Mkt	total
3									
4	wire center	CLLI	zone						
5	Minneapolis Dow	MPLSMNDT	1	612	1%	1,054	1%	1,665	2%
6	Cedar	BLTNMNCE	2	283	10%	130	5%	412	15%
7	Normandale	BLTNMNNO	2	697	6%	1,247	10%	1,944	16%
8	Crystal	CRYSMNCR	2	974	13%	584	8%	1,558	21%
9	Orchard	GLVYMNOR	2	1,212	7%	515	3%	1,727	11%
10	Minneapolis 7th A	MPLSMN07	2	442	4%	881	8%	1,322	12%
11	Minneapolis Fran	MPLSMNFR	2	541	20%	199	7%	740	28%
12	Fort Snelling	MPLSMNFS	2	95	6%	30	2%	125	8%
13	Beech	STPLMNBE	2	1,331	42%	244	8%	1,575	50%
14	Emerson	STPLMNEM	2	801	17%	185	4%	986	21%
15	Front	STPLMNH	2	834	31%	208	8%	1,042	38%
16	Midway	STPLMNMI	2	897	5%	677	4%	1,574	9%
17	Market	STPLMNMK	2	1,116	8%	1,079	8%	2,195	16%
18	South	BLTNMNNSO	3	1,503	22%	500	7%	2,004	29%
19	Fridley	FRDLMNFR	3	647	20%	223	7%	870	27%
20	Hopkins	HPKNMNHO	3	1,438	15%	692	7%	2,130	22%
21	Minneapolis Bear	MPLSMNBE	3	1,913	15%	1,226	10%	3,139	25%
22	Central Avenue	MPLSMNGE	3	1,024	39%	180	7%	1,204	46%
23	Penn Avenue	MPLSMNPE	3	414	24%	161	9%	575	33%
24	Pillsbury Avenue	MPLSMNPI	3	1,408	46%	236	8%	1,644	54%
25	Minneapolis 24th	MPLSMNTF	3	1,380	29%	408	8%	1,788	37%
26	Maplewood	MPWDMNMA	3	1,282	21%	671	11%	1,953	32%
27	Cleveland	NWBTMNCL	3	638	6%	377	4%	1,015	10%
28	Minneapolis 66th	RCFDMN66	3	1,287	45%	140	5%	1,427	50%
29	Oakdale West	WSPLMNWS	3	1,061	22%	300	6%	1,360	29%
30	Afton	AFTNMNAF	4	189	51%	24	6%	213	58%
31	Anoka	ANOKMNAN	4	1,439	25%	293	5%	1,731	31%
32	Buffalo	BFLOMNBU	4	576	32%	65	4%	641	36%
33	Blaine	BLANMNBL	4	1,415	19%	550	7%	1,965	26%
34	Brooklyn Center	BRCTMNBC	4	1,015	30%	137	4%	1,152	34%
35	Braham	BRHMMNBR	4	184	100%	1	0%	185	100%
36	Burnsville-Qwest	BRVLMNBU	4	882	9%	1,014	11%	1,896	20%
37	Cambridge	CMBRMNCA	4	354	63%	4	1%	358	64%
38	Coon Rapids	CNRPMNND	4	1,428	36%	223	6%	1,652	41%
39	Cottage Grove	CTGVMNCG	4	665	36%	124	7%	789	43%
40	Lexington	EAGNMNLB	4	1,455	11%	695	5%	2,150	16%
41	Eden Prairie	EDPRMNPE	4	1,122	8%	740	6%	1,862	14%
42	Glen Prairie	EDPRMNGP	4	890	17%	464	9%	1,353	26%
43	Elk River	EKRVMNER	4	762	42%	125	7%	887	49%
44	Excelsior	EXCLMNEX	4	730	33%	168	8%	898	41%
45	Forest Lake	FRLKMNFL	4	510	30%	174	10%	684	40%
46	Hamel	HAMLMNHB	4	117	31%	24	6%	141	37%
47	Hanover	HNVRMNHB	4	45	26%	8	5%	53	30%
48	Isanti	ISNTMNIS	4	273	84%	26	8%	300	92%
49	Bryant	MPLSMNBB	4	1,469	40%	163	4%	1,632	44%
50	North Branch	NBRNMNBN	4	373	76%	17	3%	390	80%
51	Park Row	NSPLMNPR	4	930	26%	276	8%	1,207	33%
52	Navarre	NVRRMNNA	4	85	9%	36	4%	121	12%
53	Oak Grove	OKGVMNOG	4	338	34%	73	7%	411	41%
54	Plymouth Fernbr	PLMOMNFE	4	693	7%	426	5%	1,119	12%
55	Rockford	RCFRMNRO	4	100	45%	17	8%	118	52%
56	Rush City	RSCYMNRC	4	153	54%	7	2%	160	55%
57	Soderville	SDVLMNSO	4	375	36%	56	5%	431	41%
58	Shakopee	SHKPMNSH	4	856	17%	518	11%	1,374	28%
59	Rice Street	SHVWMNRI	4	936	12%	457	6%	1,393	18%
60	Stillwater	STWRMNST	4	530	21%	227	9%	757	30%
61	White Bear Lake	WBLKMNVB	4	958	20%	394	8%	1,352	28%
62	Wayzata	WYZTMNWA	4	775	16%	349	7%	1,124	23%
63	Total for 58 exchs			46,456	12%	20,020	5%	66,476	17%
64									

Line counts and percentages by Method of Provision and by wire center for certain CLECs
 Qwest Forbearance Case (Docket No. P421/CI-07-661)

	A	B	C	J	K	L	M	N	O	P	Q	R	S
1					% of WC		% of WC		% of WC		% of WC		
2	Customer Type			Med B	total	Lg B	total	Med/Lg	total	Enterprise	total	WC Total	
3													
4	wire center	CLLI	zone										
5	Minneapolis Dow	MPLSMNDT	1	13,400	14%	5,226	5%	78,420	79%	97,046	98%	98,711	
6	Cedar	BLTNMNC	2	1,824	65%	146	5%	425	15%	2,395	85%	2,807	
7	Normandale	BLTNMNO	2	8,490	71%	781	7%	774	6%	10,045	84%	11,989	
8	Crystal	CRYSMNCR	2	5,337	74%	147	2%	219	3%	5,703	79%	7,261	
9	Orchard	GLVYMNR	2	10,153	62%	904	6%	3,511	22%	14,568	89%	16,294	
10	Minneapolis 7th A	MPLSMN07	2	7,578	69%	1,718	16%	390	4%	9,686	88%	11,008	
11	Minneapolis Fran	MPLSMNFR	2	1,819	68%	55	2%	50	2%	1,923	72%	2,663	
12	Fort Snelling	MPLSMNFS	2	379	26%	170	11%	808	55%	1,358	92%	1,482	
13	Beech	STPLMNBE	2	1,426	45%	120	4%	21	1%	1,567	50%	3,142	
14	Emerson	STPLMNEM	2	1,116	24%	2,401	52%	144	3%	3,661	79%	4,648	
15	Front	STPLMNHB	2	1,594	58%	77	3%	16	1%	1,686	62%	2,728	
16	Midway	STPLMNMI	2	6,626	40%	6,743	40%	1,722	10%	15,091	91%	16,666	
17	Market	STPLMNMK	2	10,161	76%	450	3%	533	4%	11,144	84%	13,339	
18	South	BLTNMNS	3	4,082	60%	249	4%	512	7%	4,843	71%	6,847	
19	Fridley	FRDLMNFR	3	2,090	65%	107	3%	128	4%	2,325	73%	3,194	
20	Hopkins	HPKNMNHO	3	5,643	59%	465	5%	1,306	14%	7,414	78%	9,544	
21	Minneapolis Bear	MPLSMNBE	3	8,358	66%	745	6%	463	4%	9,566	75%	12,705	
22	Central Avenue	MPLSMNGE	3	1,211	46%	75	3%	145	5%	1,431	54%	2,636	
23	Penn Avenue	MPLSMNPE	3	1,099	64%	48	3%	0	0%	1,147	67%	1,722	
24	Pillsbury Avenue	MPLSMNPI	3	1,309	43%	62	2%	27	1%	1,398	46%	3,041	
25	Minneapolis 24th	MPLSMNTF	3	2,922	61%	93	2%	26	1%	3,042	63%	4,830	
26	Maplewood	MPWDMNMA	3	3,456	57%	176	3%	504	8%	4,137	68%	6,090	
27	Cleveland	NWBTMNCL	3	5,411	51%	3,111	29%	1,070	10%	9,591	90%	10,606	
28	Minneapolis 66th	RCFDMN66	3	1,085	38%	82	3%	238	8%	1,404	50%	2,832	
29	Oakdale West	WSPLMNWS	3	2,793	59%	434	9%	160	3%	3,386	71%	4,747	
30	Afton	AFTNMNAF	4	131	36%	14	4%	11	3%	156	42%	369	
31	Anoka	ANOKMNAN	4	3,267	58%	388	7%	272	5%	3,926	69%	5,657	
32	Buffalo	BFLOMNBU	4	760	42%	32	2%	357	20%	1,148	64%	1,790	
33	Blaine	BLANMNBL	4	4,819	64%	267	4%	461	6%	5,547	74%	7,512	
34	Brooklyn Center	BRCTMNBC	4	1,730	52%	127	4%	339	10%	2,196	66%	3,349	
35	Braham	BRHMNBR	4	0	0%	0	0%	0	0%	0	0%	185	
36	Burnsville-Qwest	BRVLMNBU	4	6,350	67%	869	9%	425	4%	7,644	80%	9,540	
37	Cambridge	CMBRMNCA	4	204	36%	1	0%	0	0%	205	36%	564	
38	Coon Rapids	CNRPMNND	4	1,870	47%	397	10%	62	2%	2,329	59%	3,980	
39	Cottage Grove	CTGVMNCG	4	978	53%	42	2%	41	2%	1,061	57%	1,850	
40	Lexington	EAGNMNLB	4	8,440	63%	1,290	10%	1,572	12%	11,302	84%	13,451	
41	Eden Prairie	EDPRMNPE	4	9,660	72%	523	4%	1,326	10%	11,508	86%	13,370	
42	Glen Prairie	EDPRMNPG	4	3,690	71%	98	2%	59	1%	3,847	74%	5,200	
43	Elk River	EKRVMNER	4	849	47%	28	2%	57	3%	934	51%	1,821	
44	Excelsior	EXCLMNEX	4	1,164	53%	106	5%	41	2%	1,310	59%	2,209	
45	Forest Lake	FRLKMNFL	4	928	54%	64	4%	29	2%	1,021	60%	1,705	
46	Hamel	HAMLMNHB	4	210	55%	18	5%	11	3%	240	63%	381	
47	Hanover	HNVRMNHB	4	82	47%	40	23%	0	0%	122	70%	175	
48	Isanti	ISNTMNIS	4	26	8%	0	0%	0	0%	26	8%	325	
49	Bryant	MPLSMNBB	4	1,915	52%	72	2%	99	3%	2,087	56%	3,719	
50	North Branch	NBRNMNNB	4	89	18%	11	2%	0	0%	100	20%	489	
51	Park Row	NSPLMNPR	4	1,957	54%	209	6%	233	6%	2,399	67%	3,606	
52	Navarre	NVRRMNNA	4	853	87%	11	1%	0	0%	863	88%	984	
53	Oak Grove	OKGVMNOG	4	517	51%	78	8%	0	0%	595	59%	1,006	
54	Plymouth Fernbro	PLMOMNFE	4	6,158	65%	1,022	11%	1,131	12%	8,311	88%	9,430	
55	Rockford	RCFRMNRO	4	107	48%	1	0%	0	0%	108	48%	226	
56	Rush City	RSCVMNRC	4	119	42%	5	2%	0	0%	125	44%	285	
57	Soderville	SDVLMNSO	4	558	54%	24	2%	26	3%	608	59%	1,040	
58	Shakopee	SHKPMNSH	4	3,241	68%	124	3%	167	3%	3,532	72%	4,906	
59	Rice Street	SHVVMNRI	4	3,706	48%	1,600	21%	1,028	13%	6,334	82%	7,727	
60	Stillwater	STWRMNST	4	1,705	67%	66	3%	35	1%	1,806	70%	2,562	
61	White Bear Lake	WBLKMNVB	4	3,162	66%	157	3%	151	3%	3,471	72%	4,822	
62	Wayzata	WYZTMNWA	4	3,233	67%	277	6%	205	4%	3,715	77%	4,839	
63	Total for 58 exchs			181,838	48%	32,545	9%	99,747	26%	314,130	83%	380,606	
64													

Line counts and percentages by Method of Provision and by wire center for certain CLECs
 Qwest Forbearance Case (Docket No. P421/CI-07-661)

1	A	B	C	D	E	F	G	H	I
2	Customer Type			Res	% of WC total	Sm B	% of WC total	Mass Mkt	% of WC total
3									
65	UNE zones								
66	zone 1			612	1%	1,054	1%	1,665	2%
67	zone 2			9,223	10%	5,977	6%	15,200	16%
68	zone 3			13,996	20%	5,114	7%	19,110	28%
69	zone 4			22,625	19%	7,875	7%	30,501	26%
70	Total			46,456	12%	20,020	5%	66,476	17%
71									
72				Each percentage is the percentage of wire center total lines.					
73									
74									

Line counts and percentages by Method of Provision and by wire center for certain CLECs
 Qwest Forbearance Case (Docket No. P421/CI-07-661)

	A	B	C	J	K	L	M	N	O	P	Q	R	S
1					% of WC		% of WC		% of WC		% of WC	WC	
2	Customer Type			Med B	total	Lg B	total	Med/Lg	total	Enterprise	total	Total	
3													
65	UNE zones												
66	zone 1			13,400	14%	5,226	5%	78,420	79%	97,046	98%	98,711	
67	zone 2			56,502	60%	13,712	15%	8,613	9%	78,827	84%	94,027	
68	zone 3			39,459	57%	5,646	8%	4,579	7%	49,683	72%	68,793	
69	zone 4			72,477	61%	7,962	7%	8,135	7%	88,574	74%	119,075	
70	Total			181,838	48%	32,545	9%	99,747	26%	314,130	83%	380,606	
71													
72													
73													
74													