



Qwest
607 14th Street, NW, Suite 950
Washington, DC 20005
Phone 202-429-3120
Facsimile 202-293-0561

Melissa E. Newman
Vice President – Federal Regulatory

EX PARTE

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Dana Shaffer
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 Ms. Shaffer:

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 filed updated lists on July 8, 2005 and July 10, 2007.²

Since its last update, Qwest has identified additional 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 A. These determinations are based on 2007 ARMIS 43-08 business line data (filed April 1, 2008), business line counts associated with Qwest Local Service Platform 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

Attachment

¹ *See* Letter to Jeffrey J. Carlisle, Chief, Wireline Competition Bureau, from Gary R. Lytle, Qwest, 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, Qwest, WC Docket No. 04-313 and CC Docket No. 01-338, dated July 8, 2005; Letter to Thomas Navin, Chief, Wireline Competition Bureau, from Melissa Newman, dated July 10, 2007.

**ATTACHMENT A:
2008 ADDITIONS TO QWEST NON-IMPAIRED WIRE CENTER LIST**

| STATE | WIRE CENTER | CLLI8 | TIER | NO IMPAIRMENT FOR |
|--------------|---------------------------------|--------------|-------------|----------------------------|
| AZ | Gilbert | MESAAZGI | Tier 2 | DS3 Transport & DF |
| | Deer Valley North | DRVYAZNO | Tier 1 | DS1 and DS3 Transport & DF |
| | Phoenix Southeast | PHNXAZSE | Tier 1 | DS1 and DS3 Transport & DF |
| IA | Des Moines | DESMIADT | Tier 2 | DS3 Transport & DF |
| | Davenport | DVNPIADT | Tier 2 | DS3 Transport & DF |
| | Sioux City | SXCYIADT | Tier 2 | DS3 Transport & DF |
| | Ashworth | DESMIAAW | Tier 2 | DS3 Transport & DF |
| ID | Boise West | BOISIDWE | Tier 2 | DS3 Transport & DF |
| | Boise Main | BOISIDMA | Tier 1 | DS1 and DS3 Transport & DF |
| MN | Minneapolis 7 th Ave | MPLSMN07 | Tier 1 | DS1 and DS3 Transport & DF |
| | Duluth Melrose | DLTHMNME | Tier 1 | DS1 and DS3 Transport & DF |
| | Bloomington South | BLTNMNSO | Tier 1 | DS1 and DS3 Transport & DF |
| | Crystal | CRYSMNCR | Tier 1 | DS1 and DS3 Transport & DF |
| | Rochester | ROCHMNRO | Tier 1 | DS1 and DS3 Transport & DF |
| | Fernbrook | PLMOMNFE | Tier 1 | DS1 and DS3 Transport & DF |
| | Burnsville | BRVLMNBU | Tier 2 | DS3 Transport & DF |
| | Cleveland | NWBTMNCL | Tier 2 | DS3 Transport & DF |
| | Fort Snelling | MPLSMNFS | Tier 2 | DS3 Transport & DF |
| | Hopkins | HPKNMNHO | Tier 2 | DS3 Transport & DF |
| | Little Falls | LTFLMNLF | Tier 2 | DS3 Transport & DF |
| ND | West Fargo | WFRGNDBC | Tier 2 | DS3 Transport & DF |
| | Fargo-Morehead | FARGNDBC | Tier 2 | DS3 Transport & DF |

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| | | | | |
|----|------------------|----------|--------|----------------------------|
| NM | Albuquerque Main | ALBQNMMA | Tier 1 | DS1 and DS3 Transport & DF |
| UT | Draper | DRPRUTMA | Tier 2 | DS3 Transport & DF |