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Attorneys for Qwest Corporation

BEFORE THE IDAHO PUBLIC UTILITITES COMMISSION

IN THE MATTER OF QWEST  
CORPORATION'S PETITION FOR  
APPROVAL OF NON-IMPAIRMENT  
STATUS FOR DS3 LOOPS IN THE  
BOISE MAIN WIRE CENTER

Case No. QWE-T-09-15

**AFFIDAVIT OF RENÉE ALBERSHEIM**

STATE OF COLORADO            )  
  ) ss.  
COUNTY OF DENVER            )

I, RENÉE ALBERSHEIM, being first duly sworn, depose and state that:

1. My name is Renée Albersheim. I am employed by Qwest Corporation as a Staff Witnessing Representative in the Wholesale Organization. My business address is 1801 California St., 24<sup>th</sup> Floor, Denver, Colorado 80202.

2. On June 20, 2008, Qwest filed various petitions for state commission approval of its “non-impaired” wire center lists pursuant to the Federal Communications Commission’s (“FCC’s”) *Triennial Review Remand Order* (“*TRRO*”) with various state regulatory commissions, including the Idaho Public Utilities Commission. This Commission docketed Qwest’s petition regarding its Idaho wire centers as Case No. QWE-T-08-07. Qwest also filed the list of non-impaired wire centers with the FCC.
3. On July 27, 2009, the Idaho Commission issued its Order No. 30866 in Case No. QWE-T-08-07, in which it found that Qwest’s Boise Main wire center, with five “fiber-based collocators,” as that term is defined in the *TRRO* and the FCC’s associated implementation rule, 47 CFR 51.5, is a “Tier 1” wire center and, therefore, is non-impaired with regard to DS1 and DS3 transport services. The Commission also found that Qwest’s Boise West wire center, with three fiber-based collocators, is a “Tier 2” wire center and, therefore, is non-impaired with regard to DS3 transport services.
4. However, in its Order No. 30866, the Commission declined to make a determination of non-impairment for DS3 loops at the Boise Main wire center, and stated: “The record does not reveal whether the 2008 year-end data supports a find of non-impairment for DS3 loops in the Boise Main wire center.” Order 30866, p. 5.
5. On August 31, 2009, Qwest will file a petition with the Idaho Commission requesting approval of non-impairment status for DS3 loops at the Boise Main wire center. DS3 loop non-impairment results when a wire center houses a minimum of four fiber-based collocators *and* supports at least 38,000 “business lines,” as that term is defined in the *TRRO* and the FCC’s associated implementation rule, 47 CFR 51.5. This affidavit speaks to the number of business lines at the Boise Main wire center. Rachel Torrence has filed an affidavit that speaks to the number of fiber-based collocators in the Boise Main wire center.

3. In support of the filing, Qwest has prepared business line data that is in compliance with the requirements of the *TRRO* and this Commission's Order No 30866. The Idaho business access line data are attached hereto as Highly-Confidential Attachments A, B, C and D to my affidavit.
4. Highly-Confidential Attachment A includes the December 2008 *TRRO* business line counts, by line type, for the Boise Main wire center. These data are based on the *TRRO* business line methodology that the Commission approved in Order No. 30866 in Case No. QWE-T-08-07 on July 27, 2009.
5. Highly-Confidential Attachment B includes December 2008 UNE-L and EEL data by type of circuit (voice grade, DS1, DS3) for the Boise Main wire center. These data, along with the data in Highly-Confidential Attachment C, are based on the *TRRO* business line methodology that the Commission approved in Order No. 30866 in Case No. QWE-T-08-07 on July 27, 2009.
6. Highly-Confidential Attachment C includes December 2008 UNE-L and EEL data by type of circuit (voice grade, DS1, DS3) and by Competitive Local Exchange Carrier ("CLEC") for the Boise Main wire center. These data, along with the data in Highly-Confidential Attachment B, are based on the *TRRO* business line methodology that the Commission approved in Order No. 30866 in Case No. QWE-T-08-07 on July 27, 2009.
7. Highly-Confidential Attachment D includes December 2008 Qwest Platform Plus ("QPP") business line data, by Competitive Local Exchange Carrier (CLEC), for the Boise Main wire center. These are based on the *TRRO* business line methodology that the Commission approved in Order No. 30866 in Case No. QWE-T-08-07 on July 27, 2009.
8. All of the data provided in Highly-Confidential Attachments A, B, C and D are prepared, to the best of my knowledge, in a manner that complies with the requirements of the *TRRO*, and the methodology are based on the *TRRO* business line methodology that the Commission approved in Order No. 30866

in Case No. QWE-T-08-07 on July 27, 2009. Redacted versions of Exhibits A, B, C and D are attached to this affidavit. Highly-Confidential versions of these exhibits will be provided upon request to parties that sign a confidentiality agreement with Qwest.

Further affiant sayeth not

*Renée Albersheim*  
RENÉE ALBERSHEIM

SUBSCRIBED AND SWORN to before me the 28<sup>th</sup> day of August, 2009.

*Candace K. Mowers*  
NOTARY PUBLIC

My Commission Expires:

4/13/10



# Idaho 2008 Business Line Counts - December 2008

		YRMO	200712	Data
WireCenter	CLL18	Report Super Category	Sum of INSVC	Sum of REPORT_QTY
BOISE MAIN	BOISIDMA	(1) BUSINESS		
		(2) PUBLIC		
		(5) QPP/QLSP		redacted
		(6) UNB LOOP		
		(7) EEL		
BOISE MAIN	Total			

Idaho Unbundled Loops and EEL Wire Center Detail - December 2008

WC_NAME	REPORT_SUPER_CAT	PRODUCT	FACTOR	Sum of INSVC	Sum of REPORT_QTY
BOISE MAIN	(6) UNB LOOP	UNB LOOP ANALOG	1		
		UNB LOOP DIG	1		
		UNB LOOP DIG-BRI	1		
		UNB LOOP DIG-DS1	24		
	(6) UNB LOOP Total				
	(7) EEL	DS1	24		
	(7) EEL Total				
BOISE MAIN Total					

Idaho Unbundled Loops/EEL Wire Center and CLEC Detail - December 2008

CLL18	Wire Center	CLEC Code	Factor	Physical Loops		TRRO Lines in Service	
				UNB LOOP	EEL	UNB LOOP	EEL
BOISIDMA	BOISE MAIN	CLEC N		1			
				24			
		CLEC J		24			
		CLEC F		1			
		CLEC O		24			
BOISE MAIN Total							

Idaho QPP Wire Center and CLEC Detail - December 2008

CLL18	WC NAME	CLEC Code	Total
BOISIDMA	BOISE MAIN	CLECA	
		CLECB	
		CLECI	
		CLECC	
		CLECD	
		CLECE	
		CLECF	
		CLECG	
		CLECM	
		CLECH	
BOISIDMA Total			