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BEFORE THE IDAHO PUBLIC UTILITIES 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~~XX~~

AFFIDAVIT OF RACHEL TORRENCE

STATE OF COLORADO)
) ss.
COUNTY OF ARAPAHOE)

I, RACHEL TORRENCE, being first duly sworn, depose and state that:

1. My name is Rachel Torrence. I am employed by Qwest Corporation as a Director specializing in Network Issues. My business address is 700 W. Mineral Avenue, Littleton, Colorado 80120.
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. In support of these filings, I had conducted an inventory of "fiber-based collocators," as that term is defined in the *TRRO* and the FCC's associated implementation rule, 47 CFR 51.5, in Qwest's wire centers to ascertain the number of fiber-based collocators in each wire center, and the appropriate "tier" designation. The tier designations were subsequently used to establish non-impairment of those wire centers that qualify as being non-impaired.

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, was a "Tier 1" wire center and therefore, is non-impaired with regard to DS1 and DS3 transport services.
4. However, in its Order No. 30866, the Commission declined to make a determination of non-impairment for DS3 loops, 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 fiber-based collocators at the Boise Main wire center. Renee Albersheim has also filed an affidavit that speaks to the number of business lines at the Boise Main wire center.
6. Having already been designated by this Commission as a "Tier 1" wire center by virtue of having exceeded the minimum number of fiber-based collocators,

the Boise Main wire center will remain a Tier 1 non-impaired wire center in perpetuity. Thus, the Boise Main wire center already meets the minimum fiber-based collocator requirement for DS3 loop non-impairment.

7. Because this Commission has already established the Boise Main wire center as a Tier 1 non-impaired wire center, based on the number of fiber-based collocators in that wire center, Qwest does not believe that the number of fiber-based collocators at that wire center needs to be readdressed for purposes of a finding that the wire center has the requisite number of fiber-based collocators for DS3 loop non-impairment. Nevertheless, I have reviewed the number of fiber-based collocators in the Boise Main wire center and have once again confirmed the presence of five fiber-based collocators in that wire center, which is sufficient for non-impairment status.
8. Specifically, during the first quarter of each year, I conduct a review of the number of fiber-based collocators in Qwest wire centers, in preparation for Qwest's annual filings for additions to its non-impaired wire center lists. In 2009, I determined that no collocations in the Boise Main wire center had been de-commissioned. Furthermore, on April 13, 2009, in preparation for the scheduled hearing in Case No. QWE-T-08-07, I confirmed that the Boise Main wire center still housed the previously identified five fiber-based collocators.

9. Accordingly, the Commission's previous designation of the Boise Main wire center as a Tier 1 wire center, and the recently confirmed number of five existing fiber-based collocators, support a Commission finding of DS3 loop non-impairment for the Boise Main wire center.

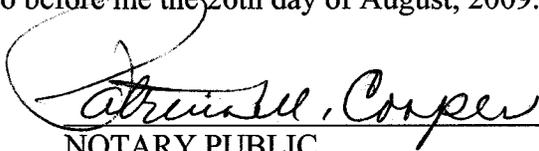
Further this affiant sayeth not.

DATE: August 26, 2009



RACHEL TORRENCE

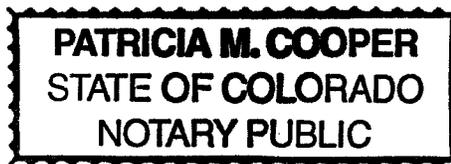
SUBSCRIBED AND SWORN to before me the 26th day of August, 2009.



NOTARY PUBLIC

My Commission Expires:

5-4-2012

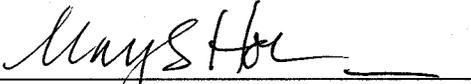


CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing **Qwest's Petition for Approval of Non-Impairment Status for DS3 Loops in the Boise Main Wire Center** and the **Affidavits of Renee Albersheim and Rachel Torrence** were served on the 31st day of August, 2009 on the following individuals:

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