

Mary S. Hobson (ISB. No. 2142)
999 Main, Suite 1103
Boise, ID 83702
Tel: 208-385-8666
mary.hobson@qwest.com

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IDAHO PUBLIC
UTILITIES COMMISSION

Adam L. Sherr
Corporate Counsel, Qwest
1600 7th Avenue, Room 3206
Seattle, WA 98191
Tel: (206) 398-2507
adam.sherr@qwest.com

Attorneys for Qwest Corporation

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF QWEST CORPORATION'S PETITION FOR APPROVAL OF NON-IMPAIRED WIRE CENTER LISTS PURSUANT TO THE TRIENNIAL REVIEW REMAND ORDER	Case No. QWE-T-08-07
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AFFIDAVIT OF ROBERT BRIGHAM

STATE OF COLORADO)
) ss.
COUNTY OF DENVER)

I, ROBERT BRIGHAM, being first duly sworn, depose and state that:

1. My name is Robert Brigham. I am employed by Qwest Corporation as a Staff Director in the Public Policy Organization. My business address is 1801 California St., Suite 4700, Denver, Colorado 80202.


2. On June 20, 2008, Qwest filed a *Petition for Commission Approval of Non-Impaired Wire Center Lists Pursuant to the Triennial Review Remand Order* (“TRRO”). Qwest and several major CLECs (“Joint CLECs”) who were parties to similar TRRO proceedings in six other states in Qwest’s 14-state ILEC region, reached a Settlement Agreement (see Attachment A of Qwest’s June 20, 2008 petition), that defined, among other things, (1) the method to be used to calculate TRRO business line counts and (2) the supporting line information that was to be provided by Qwest. All but one of the commissions in these six states have approved this settlement.¹ In adherence to terms of the settlement, Qwest filed a list of Non-Impaired Wire Centers in Idaho with its June 20, 2008 petition. Qwest also filed the list of additional Non-Impaired Wire Centers with the Federal Communications Commission (“FCC”).
3. In support of the filing, Qwest has prepared business line data that is in compliance with the requirements of the Triennial Review Remand Order (“TRRO”), and that follow the methodology defined in Section V(A) of the Settlement Agreement. 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 2007 TRRO business line counts, by line type, for each additional non-impaired wire center that is classified as non-impaired based on the number of business lines. These data are based on the TRRO business line methodology defined in Section V(A) of the Settlement Agreement. These data are provided in a form that meets the requirements defined in Section VI(E)(2)(a) of the Settlement Agreement.
5. Highly Confidential Attachment B includes UNE-L and EEL data by type of circuit (voice grade, DS1, DS3) for each additional non-impaired wire center that is classified as non-impaired based on the number of business lines. These data, along with the data in Highly Confidential Attachment C, meet the requirements defined in Section VI(E)(2)(b) of the Settlement Agreement.

¹ The Settlement was approved in Arizona, Minnesota, Oregon, Utah and Washington. It has not yet been

6. Highly Confidential Attachment C includes the UNE-L and EEL data by type of circuit (voice grade, DS1, DS3) and by Competitive Local Exchange Carrier (“CLEC”) for each additional non-impaired wire center that is classified as non-impaired based on the number of business lines. These data, along with the data in Highly Confidential Attachment B, meet the requirements defined in Section VI(E)(2)(b) of the Settlement Agreement.
7. Highly Confidential Attachment D includes the Qwest Platform Plus (“QPP”) business line data, by Competitive Local Exchange Carrier (CLEC), for each additional non-impaired wire center that is classified as non-impaired based on the number of business lines. These data meet the requirements defined in Section VI(E)(2)(c) of the Settlement Agreement.
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 defined in Section V(A) of the Settlement Agreement. All of the data provided in Highly Confidential Attachments A, B, C and D are also prepared in a form that meets the supporting data requirements defined in Section VI(E)(2) of the Settlement Agreement.


approved in Colorado.

Further affiant sayeth not



ROBERT BRIGHAM

SUBSCRIBED AND SWORN to before me the 20th day of June, 2008.



NOTARY PUBLIC

My Commission Expires:

4/13/06


Highly Confidential Attachments A, A (redacted), B, B (redacted), C and D are filed under seal and subject to the terms of the Protective Agreement.

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing **AFFIDAVIT OF ROBERT BRIGHAM** was served on the 27th day of June, 2008 on the following individuals:

Jean D. Jewell
Idaho Public Utilities Commission
472 West Washington Street
P.O. Box 83720
Boise, ID 83702
Telephone (208) 334-0300
Facsimile: (208) 334-3762
jjewell@puc.state.id.us

Hand Delivery
 U. S. Mail
 Overnight Delivery
 Facsimile
 Email



Mary S. Hobson
Attorney for Qwest Corporation