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JUN 27 2008

June 27, 2008

PUBLIC SERVICE COMMISSION

Ms. Ilona Jeffcoat-Sacco
Executive Secretary
North Dakota Public Service Commission
600 East Boulevard Avenue, 12th Floor
Bismarck, ND 58505-0480

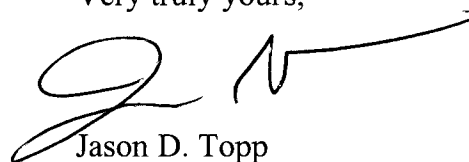
**Re: In the Matter of Qwest Corporation Petition for Commission
Approval of Non-Impaired Wire Center Lists Pursuant to the
Triennial Review Remand Order
Docket No. PU-08-373**

Dear Ms. Jeffcoat-Sacco:

Enclosed for filing are the original and seven copies of the following regarding the above-referenced matter:

1. Qwest Corporation's Filing for Commission Approval of 2008 Additions to Non-Impaired Wire Center Designations, with Supporting Data; and
2. An Application Requesting Trade Secret Protection of Highly Confidential Information.

Very truly yours,



Jason D. Topp

JDT/bardm

Enclosures

cc: Service List

2 **PU-08-373** Filed: 6/27/2008 Pages: 11
**Request for Non-Impaired Wire Center Designations
with Supporting Data**

CERTIFICATE OF SERVICE

I hereby certify that on this 27th day of June, 2008, the original and seven copies of the foregoing Qwest Corporation's Filing for Commission Approval of 2008 Additions to Non-Impaired Wire Center Designations, with Supporting Data and An Application Requesting Trade Secret Protection of Highly Confidential Information were served upon the following party:

Ms. Illona Jeffcoat-Sacco
Executive Secretary
North Dakota Public Service Commission
600 East Boulevard Avenue, 12th Floor
Bismarck, ND 58505-0480

and copies sent electronically or via U.S. mail, addressed to the following:

Kent Blickensderfer
Qwest Corporation
220 North 5th Street
P.O. Box 5508
Bismarck, ND 58501
Kent.Blickensderfer@qwest.com



Dianne Barthel

**STATE OF NORTH DAKOTA
PUBLIC SERVICE COMMISSION**

In the Matter of QWEST CORPORATION Petition for Commission Approval of Non-impaired Wire Center Lists pursuant to the Triennial Review Remand Order	Docket No. PU-08-373 QWEST CORPORATION'S FILING FOR COMMISSION APPROVAL OF 2008 ADDITIONS TO NON-IMPAIRED WIRE CENTER DESIGNATIONS, WITH SUPPORTING DATA
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INTRODUCTION

On Friday, June 20, 2008, Qwest Corporation ("Qwest") petitioned the Commission to open a docket for approval of Qwest's 2008 additions to its non-impaired wire center list in North Dakota. The Commission docketed this petition as Docket No. PU-08-373.

As Qwest explained in its June 20th petition, Qwest is now submitting its data in support of its petition and asks that the Commission designate the wire centers identified herein as non-impaired.

DISCUSSION

I. Support For the Non-Impairment Designation of Wire Centers

In support of Qwest's request are the affidavits and attachments of Ms. Rachel Torrence. Ms. Torrence's affidavit and attachments describe and present evidence in support of the inventory of fiber-based collocators in Qwest's North Dakota wire centers that were used to ascertain the appropriate "tier" designation and subsequent non-impairment designation. Ms. Torrence's affidavit and attachments can be found at Appendix 1.

The wire centers for which Qwest seeks a non-impairment designation are as follows:

STATE	WIRE CENTER	CLLI	TIER	NON-IMPAIRMENT FOR
ND	West Fargo	WFRGNDBC	Tier 2	DS3 Transport & Dark Fiber
	Fargo-Moorhead	FARGNDBC	Tier 2	DS3 Transport & Dark Fiber

Highly-Confidential Trade Secret Data

Qwest's request requires the provision of data that include highly-confidential trade secret CLEC data. In order to protect these data from inappropriate disclosure, Qwest asked the Commission to issue a protective order that would provide for the appropriate handling of these confidential data. Because the Commission keeps documents filed as trade secret under seal by law, Qwest provides to the Commission the data supporting its list of additional non-impaired wire centers. Qwest will also provide the data to all CLECs that have provided Qwest with an executed copy of the protective order once one it is issued.

In addition to any formal notice that the CLECs may have received as a part of this proceeding, Qwest also provided a general notice to all CLECs on June 12, 2008 indicating which wire centers might be included in Qwest's filing. A copy of that notice is attached to this pleading as Appendix 2.

In order to expedite provision of data to CLECs, each CLEC requesting the data should provide to Qwest a PDF copy of its signed protective order once the Commission has issued the protective order. That signed agreement should be provided to Stacy Hanson of Qwest at stacy.hanson@qwest.com. The CLEC should also specify the person's name, street address and telephone number to whom the data should be provided by overnight mail.

CONCLUSION

For the reasons set forth above, Qwest respectfully requests the Commission approve Qwest's 2008 list of non-impaired wire center list in North Dakota as specified herein.

Dated: June 27, 2008

Respectfully submitted,

QWEST CORPORATION



Jason D. Topp
200 South Fifth Street, Room 2200
Minneapolis, MN 55402
(612) 672-8905

Attorney for Qwest Corporation

Protective Order filed with the Commission on Friday, June 20, 2008 (here after referred to as the "Settlement Agreement"). Qwest also filed a list of additional Non-Impaired Wire Centers on June 20, 2008 with the various state regulatory commissions including the Public Service Commission of North Dakota. Qwest will also file the list of additional Non-Impaired Wire Centers with the Federal Communications Commission ("FCC").

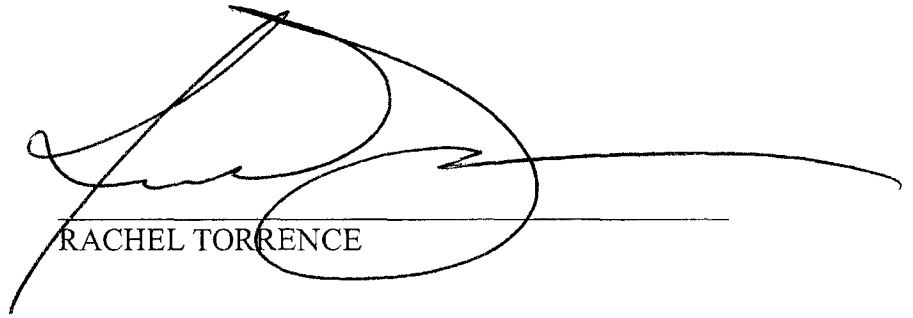
3. In support of the filing, I conducted an inventory of Fiber-Based Collocators in Qwest Wire Centers to ascertain the number of fiber-based collocators in each wire center and the appropriate "Tier" designation (See Highly Confidential Attachment A to this affidavit as referenced in paragraph 5). The Tier was subsequently used to establish Non-Impairment.
4. As part of that inventory, and consistent with the processes and procedures contained in the Settlement Agreement, I conducted a physical field verification of the inventoried fiber-based collocators, and cross-referenced the physical inventory data with the corresponding order and construction records and billing data. The results of that physical field verification (The Collocation Verification Worksheets) are contained in Highly Confidential Attachment B to this affidavit.
5. As necessary to validate the inventory data, I researched actual order records and engineering design and construction records to validate the physical configurations and the presence of an active power supply. I also researched and validated the RFS ("Ready for Service") dates which are noted on Highly Confidential Attachment A; "Collocations by Wire Center."
6. I also researched the billing records for the collocation space and the active power supply to the collocation to ensure that it was an active Fiber-Based Collocation.

7. Qwest sent the identified fiber-based collocators a letter requesting further validation of their status as a fiber-based collocator and any updated information with respect to changes in ownership, mergers and/or acquisitions (See Highly Confidential Attachment C for a copy of the letter(s), and Highly Confidential Attachment D for a summary of the responses received and copies of the correspondence between Qwest and responding CLECs).

8. Qwest undertook a thorough analysis to ensure that the number of Fiber-Based Collocators in Qwest Wire Centers was accurately counted. Its process for identifying qualifying collocators produced an accurate and verified count. This accurate and verified data on the number of Fiber-Based Collocators was one of two factors in determining which North Dakota wire centers were Non-Impaired. The other factor was the number of Business Lines in each Wire Center based on the most recently filed ARMIS 43-08 data. The resulting list of Non-Impaired North Dakota Wire Centers, having relied on this accurate and verified data, is by extension just as accurate and should be validated by this Commission.

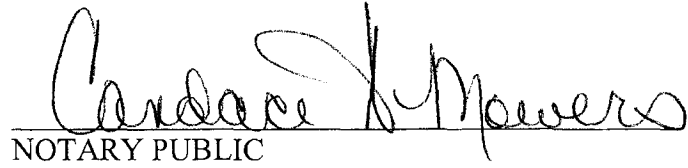
Further this affiant sayeth not.

DATE: June 27, 2008



RACHEL TORRENCE

SUBSCRIBED AND SWORN to before me the 27th day of June, 2008.



NOTARY PUBLIC

My Commission Expires:

4/13/10

Announcement Date: June 12, 2008
Filing Date: June 12, 2008
Document Number: NETW.06.22.07.2818.Add_Non_IM_Wire_Ctr
Notification Category: Contract/Network Notice
Target Audience: CLECs operating in the states of Arizona, Iowa, Minnesota, North Dakota, and Utah
Subject: Additions to Non-Impaired Wire Center Lists

On June 27, 2008 Qwest will file petitions with the following state commissions to open a docket to consider the addition of wire centers to Qwest's Non-Impaired Wire Center List:

- § Arizona
- § Iowa
- § Idaho
- § Minnesota
- § New Mexico
- § North Dakota
- § Utah

Qwest will also request a protective order governing the confidential data supporting these additions to be issued expeditiously.

On June 27, 2008 Qwest will file with the state regulatory commissions of the affected states for approval of these additions to Qwest's Non-Impaired Wire Center List.

Qwest offers this Notice pursuant to the terms and conditions of the Multi-State Settlement Agreement Regarding Wire Center Designations and Related Issues entered into by Qwest Corporation and Covad Communications Company and DIECA Communications, Inc. (collectively "Covad"), Eschelon Telecom, Inc. ("Eschelon"), Integra Telecom Holdings, Inc. ("Integra"), McLeodUSA Telecommunications Services, Inc. ("McLeodUSA"), Onvoy, POPP.Com ("POPP"), US Link, Inc. d/b/a TDS Metrocom, Inc. ("TDSM"), and XO Communications Services, Inc. ("XO") on June 20, 2007.

At this time, Qwest anticipates requesting the addition of the following Wire Centers to its Non-Impaired Wire Center Lists as having met the loop thresholds identified in CFR 47 §51.319(a)(4)(i) for DS1 Loops, or the loop thresholds identified in CFR 47 §51.319(a)(5)(i) for DS3 Loops, or the Tier 1 or Tier 2 Wire Center designations as defined in §51.319(e)(3):

STATE	WIRE CENTER	CLLI8	TIER	NO IMPAIREMENT 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

Appendix 2

ID	Boise West Boise Main	BOISIDWE BOISIDMA	Tier2 Tier 1	DS3 Transport & DF DS1 and DS3 Transport & DF
MN	Minneapolis 7 th Ave Duluth Melrose Bloomington South Crystal Rochester Fernbrook Burnsville Cleveland Fort Snelling Hopkins Little Falls	MPLSMN07 DLTHMNME BLTNMNSO CRYSMNCR ROCHMNRO PLMOMNFE BRVLMNBU NWBTMNCL MPLSMNFS HPKNMNHO LTFLMNLF	Tier 1 Tier 1 Tier 1 Tier 1 Tier 1 Tier 1 Tier 2 Tier 2 Tier 2 Tier 2 Tier 2	DS1 and DS3 Transport & DF DS1 and DS3 Transport & DF DS1 and DS3 Transport & DF DS1 and DS3 Transport & DF DS1 and DS3 Transport & DF DS1 and DS3 Transport & DF DS3 Transport & DF DS3 Transport & DF DS3 Transport & DF DS3 Transport & DF DS3 Transport & DF
ND	West Fargo Fargo-Morehead	WFRGNDBC FARGNDBC	Tier 2 Tier 2	DS3 Transport & DF DS3 Transport & DF
NM	Albuquerque Main	ALBQNMMA	Tier 1	DS1 and DS3 Transport & DF
UT	Draper	DRPRUTMA	Tier 2	DS3 Transport & DF