

**REDACTED – FOR PUBLIC INSPECTION**

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of )  
Petition of Windstream Nebraska, Inc., )  
Windstream Sugar Land, Inc., )  
And Valor Telecommunications of )  
Texas, LP d/b/a Windstream )  
Communications Southwest )  
for Pricing Flexibility )  
as Specified in Section 69.727 )  
of the Commission’s Rules for the )  
Houston, Texas MSA, Lincoln, Nebraska MSA )  
And Tulsa, Oklahoma MSA )

**PETITION OF WINDSTREAM NEBRASKA, INC., WINDSTREAM SUGAR LAND,  
INC. AND VALOR TELECOMMUNICATIONS OF TEXAS, LP D/B/A WINDSTREAM  
COMMUNICATIONS SOUTHWEST  
FOR PRICING FLEXIBILITY**

Pursuant to Sections 1.774 and 69.701 *et seq.* of the Commission’s rules, Windstream Nebraska, Inc., Windstream Sugar Land, Inc., and Valor Telecommunications of Texas, LP d/b/a Windstream Communications Southwest (collectively “Windstream”) file this Petition for pricing flexibility, as specified, in the Lincoln, Nebraska; Houston, Texas; and Tulsa, Oklahoma Metropolitan Statistical Areas (MSAs).<sup>1</sup> First, Windstream seeks Phase I relief for dedicated transport, special access, and channel terminations between its end offices and end user “customer premises” in the Lincoln, Nebraska and Tulsa, Oklahoma MSAs. Second, Windstream requests Phase II relief for dedicated transport, special access and channel terminations between its end offices and end user “customer premises” in the Houston, Texas MSA. Windstream’s Petition demonstrates that it meets the Commission’s competitive thresholds required to obtain this pricing flexibility.

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<sup>1</sup> 47 C.F.R. §§ 1.774 and 69.701 *et seq.*

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### **COMPETITIVE THRESHOLDS**

Section 69.709 of the Commission’s rules provides that to obtain Phase I relief for dedicated transport and special access services (excluding channel terminations between an end office and end user customer premises), a price cap local exchange carrier (LEC) must demonstrate that:

- (1) Unaffiliated competitors have collocated in at least 15 percent of the LEC's wire centers within an MSA, or
- (2) Unaffiliated competitors have collocated in wire centers accounting for 30 percent of the LEC’s revenues from these services within an MSA.<sup>2</sup>

To earn Phase II relief for dedicated transport and special access services (other than channel terminations to end users), a price cap LEC must show that unaffiliated competitors have collocated in at least 50 percent of the LEC’s wire centers within the MSA or in wire centers accounting for at least 65 percent of the LEC’s revenues from these services in the MSA.<sup>3</sup>

Section 69.711 of the Commission’s rules establishes similar triggers for pricing flexibility with respect to end user channel termination services.<sup>4</sup> For a LEC to be eligible for this Phase I relief for channel terminations between a LEC’s end office and an end user customer, unaffiliated competitors must have collocated in at least 50 percent of the LEC’s wire centers in the MSA or in wire centers accounting for at least 65 percent of channel termination revenues produced in the MSA.<sup>5</sup> In order to be eligible for Phase II relief for channel terminations between a LEC end office and an end user customer, a price cap LEC must demonstrate that unaffiliated competitors have collocated in at least 65 of the LEC’s wire centers within the MSA, or in wire centers accounting for 85 percent of the LEC’s revenues from these services within the MSA.<sup>6</sup>

### **METHODOLOGY**

The methodology supporting Windstream’s pricing flexibility analysis is set forth in Appendix D to this Petition. The methodology includes the procedures Windstream used to

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<sup>2</sup> 47 C.F.R. § 69.709(a).

<sup>3</sup> 47 C.F.R. § 69.709(c).

<sup>4</sup> 47 C.F.R. § 69.711(a), (b).

<sup>5</sup> 47 C.F.R. § 69.711(b).

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collect and calculate the data supporting this Petition. Appendix D describes how Windstream identified collocated competitors in Windstream's wire centers and determined which of these collocators used transport facilities owned by a provider other than Windstream. Appendix D further describes how Windstream assigned wire centers to a MSA, gathered the revenue data used to calculate the percentages to satisfy the thresholds, and complied with Section 69.725 of the Commission's rules in attributing revenues to particular wire centers.<sup>7</sup>

### **COMPETITIVE THRESHOLDS SATISFIED**

Appendices B and C demonstrate that Windstream has met the applicable competitive thresholds for each of the forms of pricing flexibility requested. Pursuant to Section 1.744(a) of the Commission's rules, Windstream produces the following data with respect to each MSA in which it seeks pricing flexibility: (1) the total number of wire centers; (2) the number and location of wire centers in which competitors have collocated; (3) in each wire center on which Windstream bases its Petition, the name of at least one collocator that uses transport facilities owned by a provider other than Windstream; and (4) the percentage of total base period revenues generated by applicable services that are attributable to wire centers in which competitors have collocated and use transport facilities owned by a provider other than Windstream.<sup>8</sup> Services eligible for pricing flexibility in the MSAs at issue are specified in Appendix A.

### **NOTICE TO COLLOCATING PARTIES**

Pursuant to Section 1.774(e) of the Commission's Rules, Windstream is required to provide notice of this Petition to each collocating party referenced in support of this Petition. This notice must include the information Windstream provides about the collocator, even if Windstream requests that this information be kept confidential.<sup>9</sup> Attachment E certifies that Windstream provided this notice. Copies of the letters required by Section 1.774(e) also are attached to this Petition.

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<sup>6</sup> 47 C.F.R. § 69.711(c).

<sup>7</sup> 47 C.F.R. § 69.725.

<sup>8</sup> 47 C.F.R. § 1.774(a)(3).

<sup>9</sup> 47 C.F.R. § 1.774(e).

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**CONCLUSION**

The Commission should grant this Petition based on Windstream’s demonstration that it meets requirements for Phase I relief for dedicated transport, special access, and channel terminations between its end offices and end user “customer premises” in the Lincoln, Nebraska, and Tulsa, Oklahoma MSAs, and Phase II relief for dedicated transport, special access, and channel terminations between its end offices and end user “customer premises” in the Houston, Texas MSA.

Respectfully submitted,

Windstream Nebraska, Inc.  
Windstream Sugar Land, Inc.  
Valor Telecommunications of Texas, LP d/b/a  
Windstream Communications Southwest

/s/ Malena Barzilai

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January 26, 2012

*Its Attorneys*

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**LIST OF APPENDICES**

Appendix A ..... Qualifying Services

Appendix B ..... Summary of Justification for Requested Relief

Appendix C ..... Required Collocator/Revenue Demonstrations by MSA

Appendix D ..... Description of Methodology

Appendix E ..... Certification

**ACCESS SERVICES FOR PRICING FLEXIBILITY  
QUALIFYING SERVICES**

**Trunking Basket\***

Voice Grade  
Digital Data  
DS1  
DS3

\* Includes dedicated transport services (entrance facilities, direct trunked transport, flat-rated portion of tandem switched transport); channel terminations between the serving wire center (end office) and end user's premises; and the optional features and functions associated with these services.

**Special Access Basket\*\***

Voice Grade  
Digital Data (DDS)  
Program Audio  
Video  
DS1  
Fractional Digital DS1  
DS3  
Synchronous Optical Service (OCN) 3, 12

\*\* Includes channel terminations between the IXC POP and the serving wire center (end office); channel terminations between the end office and the customer premise; channel mileage; and the optional features and functions associated with these services.

**SUMMARY OF JUSTIFICATION FOR REQUESTED RELIEF**

**Windstream MSA Areas and Petitioned Relief**

<b>Lincoln, Nebraska MSA</b>	<b>Price Flex Phase</b>	<b>FCC Trigger Revenue %</b>	<b>WIN Actual Revenue %</b>	<b>Qualifies for Price Flex</b>
Dedicated Transport and Special Access	I	30.00%	42.40%	Yes
Channel Termination	I	65.00%	82.50%	Yes
<b>Houston, Texas MSA</b>	<b>Price Flex Phase</b>	<b>FCC Trigger Revenue %</b>	<b>WIN Actual Revenue %</b>	<b>Qualifies for Price Flex</b>
Dedicated Transport and Special Access	II	65.00%	95.50%	Yes
Channel Termination	II	85.00%	96.80%	Yes
<b>Tulsa, Oklahoma MSA</b>	<b>Price Flex Phase</b>	<b>FCC Trigger Revenue %</b>	<b>WIN Actual Revenue %</b>	<b>Qualifies for Price Flex</b>
Dedicated Transport and Special Access	I	30.00%	52.30%	Yes
Channel Termination	I	65.00%	68.50%	Yes

**LINCOLN, NE REQUIRED COLLOCATOR/REVENUE DEMONSTRATIONS BY MSA**

MSA - Lincoln, NE					Annual Revenue from CTs between LEC end offices and customer premises	Annual Revenue from Dedicated Transport and Special Access services other than CTs between LEC end offices and customer premises	Collocator w/facilities
State	Company	OCN	Rate Center	CLLI	CT	DT	
NE	WINDSTREAM NEBRASKA, INC.	1568	ADAMS	ADMSNEXL			
NE	WINDSTREAM NEBRASKA, INC.	1568	ASHLAND	ASLDNEXL			
NE	WINDSTREAM NEBRASKA, INC.	1568	AUBURN	AUBNEXL			
NE	WINDSTREAM NEBRASKA, INC.	1568	BEATRICE	BTRCNEXL			
NE	WINDSTREAM NEBRASKA, INC.	1568	BEAVERCSNG	BVRCNEXL			
NE	WINDSTREAM NEBRASKA, INC.	1568	BENNET	BNNTNEXL			
NE	WINDSTREAM NEBRASKA, INC.	1568	BRAINARD	BRNRNEXL			
NE	WINDSTREAM NEBRASKA, INC.	1568	BROWNVILLE	BWVNLNEXL			
NE	WINDSTREAM NEBRASKA, INC.	1568	CARLETON	CATNNEXL			
NE	WINDSTREAM NEBRASKA, INC.	1568	CEDAR BLF	CDBLNEXL			
NE	WINDSTREAM NEBRASKA, INC.	1568	CERESCO	CRSCNEXL			
NE	WINDSTREAM NEBRASKA, INC.	1568	CLATONIA	CLATNEXL			
NE	WINDSTREAM NEBRASKA, INC.	1568	CLAYCENTER	CLCTNEXL			
NE	WINDSTREAM NEBRASKA, INC.	1568	CORTLAND	CRLDNEXL			
NE	WINDSTREAM NEBRASKA, INC.	1568	CRETE	CRETNEXL			
NE	WINDSTREAM NEBRASKA, INC.	1568	DAVEY	DAVYNEXL			
NE	WINDSTREAM NEBRASKA, INC.	1568	DAVID CITY	DVCYNEXL			
NE	WINDSTREAM NEBRASKA, INC.	1568	DAWSON	DWSNEXL			
NE	WINDSTREAM NEBRASKA, INC.	1568	DE WITT	DWTTNEXL			
NE	WINDSTREAM NEBRASKA, INC.	1568	DENTON	DNTNEXL			
NE	WINDSTREAM NEBRASKA, INC.	1568	DUBOIS	DUBSNEXL			
NE	WINDSTREAM NEBRASKA, INC.	1568	DUNBAR	DUNBNEXL			
NE	WINDSTREAM NEBRASKA, INC.	1568	DWIGHT	DWGHNEXL			
NE	WINDSTREAM NEBRASKA, INC.	1568	EAGLE	EAGLNEXL			
NE	WINDSTREAM NEBRASKA, INC.	1568	EDGAR	EDGRNEXL			
NE	WINDSTREAM NEBRASKA, INC.	1568	FAIRBURY	FRBRNEXL			
NE	WINDSTREAM NEBRASKA, INC.	1568	FAIRFIELD	FRFDNEXL			
NE	WINDSTREAM NEBRASKA, INC.	1568	FAIRMONT	FAMTNEXL			
NE	WINDSTREAM NEBRASKA, INC.	1568	FRIEND	FRNDNEXL			
NE	WINDSTREAM NEBRASKA, INC.	1568	GENEVA	GENVNEXL			
NE	WINDSTREAM NEBRASKA, INC.	1568	GREENWOOD	GNWDNEXL			
NE	WINDSTREAM NEBRASKA, INC.	1568	GRESHAM	GRHMNEXL			
NE	WINDSTREAM NEBRASKA, INC.	1568	HALLAM	HLLMNEXL			
NE	WINDSTREAM NEBRASKA, INC.	1568	HANSEN	HANSNEXL			
NE	WINDSTREAM NEBRASKA, INC.	1568	HASTINGS	HSNGNEXL			
NE	WINDSTREAM NEBRASKA, INC.	1568	HEBRON	HBRNEXL			
NE	WINDSTREAM NEBRASKA, INC.	1568	HICKMAN	HCMNEXL			
NE	WINDSTREAM NEBRASKA, INC.	1568	HUMBOLDT	HMBLNEXL			
NE	WINDSTREAM NEBRASKA, INC.	1568	JOHNSON	JHSNEXL			
NE	WINDSTREAM NEBRASKA, INC.	1568	KENESAW	KNSWNEXL			
NE	WINDSTREAM NEBRASKA, INC.	1568	LINCOLN	LNCLNEXA			
NE	WINDSTREAM NEBRASKA, INC.	1568	LOUISVILLE	LSVLNEXL			
NE	WINDSTREAM NEBRASKA, INC.	1568	MALCOLM	MLCLNEXL			
NE	WINDSTREAM NEBRASKA, INC.	1568	MARTELL	MRTLNEXL			
NE	WINDSTREAM NEBRASKA, INC.	1568	MEAD	MEADNEXL			
NE	WINDSTREAM NEBRASKA, INC.	1568	MILFORD	MLFRNEXL			
NE	WINDSTREAM NEBRASKA, INC.	1568	MURRAY	MRRYNEXL			
NE	WINDSTREAM NEBRASKA, INC.	1568	NEBRASKACY	NBCYNEXL			
NE	WINDSTREAM NEBRASKA, INC.	1568	NELSON	NLSNEXL			
NE	WINDSTREAM NEBRASKA, INC.	1568	OSCEOLA	OSCLNEXL			
NE	WINDSTREAM NEBRASKA, INC.	1568	PALMYRA	PLMYNEXL			
NE	WINDSTREAM NEBRASKA, INC.	1568	PANAMA	PANMNEXL			
NE	WINDSTREAM NEBRASKA, INC.	1568	PAWNEECITY	PANMNEXL			
NE	WINDSTREAM NEBRASKA, INC.	1568	PERU	PERUNEXL			
NE	WINDSTREAM NEBRASKA, INC.	1568	PICKRELL	PCKRNEXL			
NE	WINDSTREAM NEBRASKA, INC.	1568	PLEASANTDL	PLDLNEXL			
NE	WINDSTREAM NEBRASKA, INC.	1568	PLYMOUTH	PLMONEXL			
NE	WINDSTREAM NEBRASKA, INC.	1568	SEWARD	SWWRDNEXL			
NE	WINDSTREAM NEBRASKA, INC.	1568	SHELBY	SHLBNEXL			
NE	WINDSTREAM NEBRASKA, INC.	1568	STEELECITY	STCYNEXL			
NE	WINDSTREAM NEBRASKA, INC.	1568	STEINAUER	STNRNEXL			
NE	WINDSTREAM NEBRASKA, INC.	1568	STERLING	STNGNEXL			
NE	WINDSTREAM NEBRASKA, INC.	1568	STROMSBURG	STBGNEXL			
NE	WINDSTREAM NEBRASKA, INC.	1568	SUPERIOR	SPRRNEXL			
NE	WINDSTREAM NEBRASKA, INC.	1568	SUTTON	STTNEXL			
NE	WINDSTREAM NEBRASKA, INC.	1568	SYRACUSE	SYRCNEXL			
NE	WINDSTREAM NEBRASKA, INC.	1568	TABLE ROCK	TBRKNEXL			
NE	WINDSTREAM NEBRASKA, INC.	1568	TALMAGE	TLMGNEXL			
NE	WINDSTREAM NEBRASKA, INC.	1568	TECUMSEH	TCMSNEXL			
NE	WINDSTREAM NEBRASKA, INC.	1568	UNADILLA	UNADNEXL			
NE	WINDSTREAM NEBRASKA, INC.	1568	UNION	UNINNEXL			
NE	WINDSTREAM NEBRASKA, INC.	1568	UTICA	UTICNEXL			
NE	WINDSTREAM NEBRASKA, INC.	1568	VALPARAISO	VLPRNEXL			
NE	WINDSTREAM NEBRASKA, INC.	1568	WACO	WACONEXL			
NE	WINDSTREAM NEBRASKA, INC.	1568	WAHOO	WAHONEXL			
NE	WINDSTREAM NEBRASKA, INC.	1568	WAVERLY	WVRLNEXL			
NE	WINDSTREAM NEBRASKA, INC.	1568	WEEPINGWTR	WPWRNEXL			
NE	WINDSTREAM NEBRASKA, INC.	1568	WILBER	WLBRNEXL			
NE	WINDSTREAM NEBRASKA, INC.	1568	WYMORE	WYMRNEXL			
NE	WINDSTREAM NEBRASKA, INC.	1568	YORK	YORKNEXL			
NE	WINDSTREAM NEBRASKA, INC.	1568	YUTAN	YUTNEXL			
				Grand Total			
				Revenue from COLO Wire Centers			
				PCT Revenue from COLO Wire Centers	82.5%	42.4%	

Revenue Source: Carrier Access Billing System  
 Collocator Source: Carrier Access Billing System and confirmed through physical audit by Windstream Network technicians

**SUGAR LAND, TX REQUIRED COLLOCATOR/REVENUE DEMONSTRATIONS BY  
MSA**

MSA - Houston, TX					Annual Revenue from CTs between LEC end offices and customer premises	Annual Revenue from Dedicated Transport and Special Access services other than CTs between LEC end offices and customer premises	Collocator w/facilities
State	Company	OCN	Exchange	CLLI	CT	DT	
TX	WINDSTREAM SUGAR LAND, INC.	2147	BEN HUR	BNHRTXXA			
TX	WINDSTREAM SUGAR LAND, INC.	2147	COOLIDGE	CLDGTXXA			
TX	WINDSTREAM SUGAR LAND, INC.	2147	GARRISON	GRSNTXXA			
TX	WINDSTREAM SUGAR LAND, INC.	2147	PRAIRIE HL	PRHLTXXA			
TX	WINDSTREAM SUGAR LAND, INC.	2147	SANDY	SNDYTXXA			
TX	WINDSTREAM SUGAR LAND, INC.	2147	SUGAR LAND	SGLDTXXD			
TX	WINDSTREAM SUGAR LAND, INC.	2147	SWEENEY	SWNYTXXA			
TX	WINDSTREAM SUGAR LAND, INC.	2147	TEHUACANA	THCNTXXA			
TX	WINDSTREAM SUGAR LAND, INC.	2147	WATERWOOD	WTWDTXXA			
				Grand Total			
				Revenue from COLO Wire Centers			
				PCT Revenue from COLO Wire Centers	96.8%	95.5%	

Revenue Source: Carrier Access Billing System

Collocator Source: Carrier Access Billing System and confirmed through physical audit by Windstream Network technicians

**BROKEN ARROW, OK REQUIRED COLLOCATOR/REVENUE DEMONSTRATIONS  
BY MSA**

MSA - Tulsa, OK						Annual Revenue from CTs between LEC end offices and customer premises	Annual Revenue from Dedicated Transport and Special Access services other than CTs between LEC end offices and customer premises	Collocator w/facilities
State	Company	OCN	Exchange	CLLI	CT	DT		
OK	VALOR TELECOM TX.LP-OK DBA WINDSTREAM COMM SW	1165	AVANT	AVNTOKXC				
OK	VALOR TELECOM TX.LP-OK DBA WINDSTREAM COMM SW	1165	BARNSDALL	BRNSOKXA				
OK	VALOR TELECOM TX.LP-OK DBA WINDSTREAM COMM SW	1165	BROKEN ARROW	BRAROKXA				
OK	VALOR TELECOM TX.LP-OK DBA WINDSTREAM COMM SW	1165	COWETA	COWTOKXB				
OK	VALOR TELECOM TX.LP-OK DBA WINDSTREAM COMM SW	1165	FAIRFAX	FRFXOKXA				
OK	VALOR TELECOM TX.LP-OK DBA WINDSTREAM COMM SW	1165	HOMINY	HMNYOKXB				
OK	VALOR TELECOM TX.LP-OK DBA WINDSTREAM COMM SW	1165	PORTER	PTEROKXC				
OK	VALOR TELECOM TX.LP-OK DBA WINDSTREAM COMM SW	1165	STROUD	STRDOKXA				
OK	VALOR TELECOM TX.LP-OK DBA WINDSTREAM COMM SW	1165	WAGONER	WGNROKXD				
					Grand Total			
					Revenue from COLO Wire Centers			
					PCT Revenue from COLO Wire Centers	68.5%	52.3%	

Revenue Source: Carrier Access Billing System

Collocator Source: Carrier Access Billing System and confirmed through physical audit by Windstream Network technicians

### **DESCRIPTION OF METHODOLOGY**

This Appendix describes the methodology Windstream uses to meet the collocation and revenue thresholds necessary to obtain pricing relief for the MSAs subject to this Petition. Specifically Windstream identifies the following for each MSA: (1) wire centers within the MSA; (2) wire centers within the MSA where competitors have collocated; (3) collocators in specified wire centers within the MSA that use transport facilities other than those provided by Windstream; and (4) 2010 annual revenue data at the wire center level that is attributable to, as applicable, qualifying dedicated transport, and special access services or channel terminations between an end user's premises and the Windstream end office (wire center).

#### **Wire Centers Within Each MSA**

Windstream identified wire centers in each MSA by using both the engineering maps of the company and the MSA boundary maps displayed on the Commission's website.<sup>10</sup> If the exchange area served by a Windstream wire center was completely within a MSA, the wire center was assigned to that MSA. For those wire centers intersecting a MSA boundary, Windstream calculated the exchange area that fell within the MSA. If the area calculated exceeded 50 percent of the total area of the wire center, the wire center was assigned to the MSA.

#### **Wire Centers Where Competitors Have Collocated**

Collocation information was obtained from the Windstream Carrier Access Billing System (CABS), which contains specific billing codes for collocation. Information available in CABS includes the name of the collocator, wire center, and in-service dates.

The CABS information was confirmed through a physical audit by Windstream network technicians. Windstream's field team engineers conducted physical inventories of the applicable wire centers to validate the accuracy of the CABS information and that the collocation was operational. Windstream's field team engineers then physically identified and validated that the

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<sup>10</sup> MSAs, as defined by Section 22.909(a) of the Commission's rules, are displayed on the FCC website at <http://www.fcc.gov/oet/info/maps/census/metroareas/>. If any wire centers provided service to areas within

competitors listed in each wire center were using transport facilities owned by a transport provider other than Windstream. The field team engineers used information supplied previously by the customers along with the physical inventory to verify that the competitor had transport facilities owned by a non-Windstream provider.

Collocation information contained in the Petition includes only those wire centers identified to date and may be supplemented in future petitions. Appendix C identifies the collocators by wire center.

### **2010 Annual Revenue**

Special Access and Dedicated Transport revenue for the twelve-month period ending December 31, 2010 was gathered from CABS.<sup>11</sup> CABS performs internal validation checks on each carrier and end user bill for accuracy and completeness on a monthly basis. Each component used in the data gathering process was extracted from the CABS bill information database. Data from CABS also are used to provide demand data for FCC annual price cap filings and other such filings requiring access services revenue and demand data.

The information extracted from the 2010 billing records was at the Universal Service Order Code (USOC) level detail to assign the individual revenue elements to the proper pricing flexibility revenue category for each wire center. Individual case basis (ICB) arrangements for term plans were included in the data files. Special assembly arrangements, expanded interconnection and miscellaneous revenues have been excluded.

With respect to the revenue calculations for Interoffice Channel Mileage (CM) and Direct Trunk Transport (DTT) mileage, Windstream conservatively assigned 50 percent of all CM and DTT in collocated wire centers to other non-collocated wire centers within the same MSA. This methodology represents CM and DTT revenue that could be attributed to other wire centers at the two ends of each individual circuit.

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more than one MSA, the wire center was assigned to the MSA with the predominant portion of its service area.

Windstream reviewed the following elements when attributing revenues to the wire centers in each MSA: (1) USOC -- The unique identifier associated with a service element, which is used to identify the service being provided; (2) interstate revenue -- total billed interstate revenue attributable to the USOC (from annual 2010 revenue data); and (3) location -- the wire center location of the service element identified by the USOC.

To perform tests for dedicated transport and special access as well as channel terminations, Windstream revenues were first attributed to the appropriate wire centers as categorized by channel termination, transport, or optional features and functions. Windstream then determined whether the channel termination revenue was either at the carrier's point of presence (POP) side or at the end user side.

The 2010 annual revenue from each attributable USOC for dedicated transport and special access services was identified for each wire center in the MSA. These rate elements are as follows: (1) channel terminations and entrance facilities (CT); (2) channel mileage terminations (CMT); and (3) channel mileage facility (CMF). Revenue for each rate element was assigned to the specific wire center based on the CABS billing record, which identified the exchange to which the revenue is assigned.

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<sup>11</sup> Windstream's billing system maintains 18 months of data information. At time of this data pull January 2010 data had been deleted from the billing records allowing only for 11 months of 2010 billing records.

**CERTIFICATION**

Pursuant to Section 1.774(e) of the Commission's Rules, I hereby certify on this 26th day of January, 2012 that I have sent letters to each collocating party upon which Windstream relies in this filing. These letters inform collocating parties of the information about them that is included in this Petition. The letters were mailed Certified First Class via the U.S. Postal Service on January 23, 2012. A copy of each of the letters is attached.

/s/ Chris Cranford

Chris Cranford

January 26, 2012

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LETTERS  
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