

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of)	
)	
Qwest Petition for Pricing Flexibility for)	CCB/CPD File No.
Special Access and Dedicated Transport)	

**QWEST PETITION FOR PRICING FLEXIBILITY
FOR SPECIAL ACCESS AND DEDICATED TRANSPORT SERVICES**

Pursuant to sections 1.774 and 69.701 *et seq.* of the Federal Communications Commission's ("Commission") rules,¹ Qwest Corporation ("Qwest") hereby petitions the Commission for pricing flexibility for Qwest's special access and dedicated transport services.

I. REQUESTED RELIEF

In the *Pricing Flexibility Order*, the Commission established a framework for granting price cap local exchange carriers ("LEC") pricing flexibility in a Metropolitan Statistical Area ("MSA") upon a showing that certain competitive benchmarks have been satisfied in that MSA.² To obtain Phase I relief for dedicated transport and special access services provided in an MSA, other than channel terminations between end offices and end-user customer premises, Qwest must demonstrate that unaffiliated competitors have collocated in at least 15 percent of Qwest's wire centers within the MSA, or collocated in wire centers accounting for 30 percent of Qwest's revenues for those services within the MSA. For Phase II relief for such dedicated transport and

¹ 47 C.F.R. §§ 1.774 and 69.701 *et seq.*

² *In the Matter of Access Charge Reform; Price Cap Performance Review for Local Exchange Carriers; Interexchange Carrier Purchases of Switched Access Services Offered by Competitive Local Exchange Carriers; Petition of U S West Communications, Inc. for Forbearance from Regulation as a Dominant Carrier in the Phoenix, Arizona MSA*, CC Docket Nos. 96-262, 94-1, 98-157, CCB/CPD File No. 98-63, Fifth Report and Order and Further Notice of Proposed Rulemaking, 14 FCC Rcd. 14221 (1999) ("*Pricing Flexibility Order*").

special access services, Qwest must demonstrate that unaffiliated competitors have collocated in at least 50 percent of Qwest's wire centers within the MSA or collocated in wire centers accounting for 65 percent of Qwest's revenues from those services within the MSA.³ For both Phase I and Phase II relief, at least one of the collocated competitors in each wire center must use transport services provided by a transport provider other than Qwest.⁴

To obtain Phase I relief for channel terminations between Qwest's end offices and end user customer premises, Qwest must demonstrate that unaffiliated competitors have collocated in 50 percent of Qwest's wire centers within the MSA or collocated in wire centers accounting for 65 percent of Qwest's revenues from this service within the MSA.⁵ For Phase II relief for such channel terminations, Qwest must demonstrate that unaffiliated competitors have collocated in 65 percent of Qwest's wire centers within the MSA or collocated in wire centers accounting for 85 percent of Qwest's revenues from this service within the MSA.⁶ For both Phase I and Phase II relief, at least one of the collocated competitors in each wire center must use transport services provided by a transport provider other than Qwest.⁷

In this Petition, Qwest demonstrates that it has met the requirements for Phase I or Phase II relief, as established in the *Pricing Flexibility Order*, for certain MSAs within its in-region service territory. Specifically, of the 45 MSAs subject to this Petition:

- (1) For dedicated transport and special access services, other than channel terminations between Qwest's end offices and end-user customer premises, Qwest qualifies for

³ See 47 C.F.R. § 69.709(c).

⁴ See 47 C.F.R. § 69.709(b), (c).

⁵ See 47 C.F.R. § 69.711(b).

⁶ See 47 C.F.R. § 69.711(c).

⁷ See 47 C.F.R. § 69.711(b), (c).

Phase I and Phase II relief in 37 MSAs, and Phase I relief alone in one additional MSA.

- (2) For channel terminations between Qwest's end offices and end-user customer premises, Qwest qualifies for Phase I and Phase II relief in 26 MSAs, and Phase I relief alone in 11 additional MSAs.

Attachment A lists the MSAs for which Qwest qualifies for pricing flexibility, and Attachment B lists the Qwest services qualifying for such relief. Pursuant to section 1.774(e)(1)(ii) of the Commission's rules, Attachment C contains a certification that this petition and accompanying carrier-specific data have been made available to the collocators upon which Qwest relies on in this Petition.⁸

II. METHODOLOGY

In determining its eligibility for Phase I or Phase II relief, Qwest performed the following analysis:

(1) Identified Wire Centers Within Each MSA Where At Least One Collocator Uses a Non-Qwest Transport Provider.

Qwest obtained collocation information from its Collocation Online Milestone and Event Tracking ("COMET") database. The information available in the COMET database includes for each collocation arrangement the name of the collocator, its collocation applications, implementation dates, whether the collocator is using an alternative provider for transport, and all activities that have occurred on the collocation account. Qwest used the information provided by the COMET database to identify specific collocators by wire center, to determine whether

⁸ The proprietary version of the filing submitted to the Commission also contains copies of the letters that were sent to each of the collocators. Because Qwest considers this information proprietary, it has not included copies of the letters in the public version of the filing. Under

collocators were using transport providers other than Qwest, and confirm that collocation arrangements were complete and operational. In some instances, Qwest interconnection managers verified and supplemented collocation information obtained from the COMET database.

(2) Calculated Revenues Attributable To the Qualifying Services for Each Wire Center.

For each wire center in the Qwest region covered by this petition, Qwest divided revenues into two categories: (1) all dedicated transport and special access services revenues other than end-user channel termination revenues; and (2) revenues for all end-user customer channel terminations. Qwest extracted these revenues from its billing databases. Attachment D provides a detailed explanation of how Qwest attributed revenue to appropriate revenue categories and wire centers.

(3) Determined Which MSAs Qualified for Relief Pursuant to the Commission's Benchmarks.

Once Qwest attributed revenues to the appropriate category within each wire center, it performed the required calculations to determine which MSAs qualified for relief under the Commission's benchmarks. To make these calculations, each wire center was assigned to an MSA, or in the case of those wire centers that are not in an MSA, to the non-MSA area of each state. Using the assigned revenue data, Qwest then calculated the percentage of qualifying special access and dedicated transport revenues by category (all other or end-user channel terminations) in those wire centers. Attachment E summarizes the results for all MSAs in Qwest's region. Attachment F provides more detailed data for each MSA, including lists of qualifying wire centers in the MSA and the collocators in the wire centers. Attachments E and F

separate cover, Qwest has submitted on this date a petition for confidential treatment of the

contain information that is considered proprietary by Qwest and therefore is redacted from the public version of the filing.

III. CONCLUSION

As discussed above, Qwest has satisfied the requirements for Phase I and Phase II relief in certain MSAs in its in-region service territory. Consequently, the Commission should grant the requested pricing flexibility relief for the relevant services in the MSAs identified herein.

Respectfully submitted,

QWEST CORPORATION

By: /s/Craig J. Brown
Sharon J. Devine
Craig J. Brown
Suite 700
1020 19th Street, N.W.
Washington, DC 20036
(303) 672-2799

October 10, 2001

Its Attorneys

proprietary portions of its pricing flexibility filing.