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April 26, 2006

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Via Email and U. S. Mail

Hon. Samuel J. Petrillo
Oregon Public Utility Commission
550 Capitol Street NE, Ste. 215
PO Box 2148
Salem, OR 97308-2148

Re: ARB 665—Network Diagrams

Dear Judge Petrillo:

The purpose of this letter is to respond to the letter dated April 24, 2006, wherein counsel for Level 3 Communications LLC (“Level 3”) provided you with network diagrams purportedly on behalf of Level 3 and Qwest.

Qwest did not authorize the filing of the diagrams attached to Level 3’s letter. The primary reason is that Qwest has continued to insist that Level 3 identify the ownership of several of the pieces of equipment owned by it, which was not done on the submitted diagrams. We understand, from an email from Mr. Greene that we received shortly before last week’s telephone conference, that all equipment is owned by a Level 3 entity known as BTE Equipment LLC (“BTE”), an entity that, to the best of Qwest’s knowledge, is neither a certificated CLEC in Oregon nor a provider of enhanced services. This, of course, has potentially significant legal implications to the responsibility of Qwest to interconnection under section 251(c)(2) of the Act. It is completely unclear to Qwest how BTE interacts with the Level 3 CLEC and ESP entities that provide services in Oregon. We have recently served data requests on Level 3 in an effort to gain a better understanding of facts related to this issues. Until discovery is completed, we do not believe it will possible to provide you with a completely accurate set of diagrams.

Since the last exchange of diagrams, Mr. Linse (Qwest’s network witness) has continued to review the diagrams and has made a few more changes (which are in red) that make them more accurate. In light of Level 3’s filing, we are attaching hereto copies of Qwest’s version of

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the diagrams, which are based on the best current information available to Qwest. Once Qwest has reviewed Level 3's discovery responses, Qwest will update its version of the diagrams in its May 10, 2006 filing.

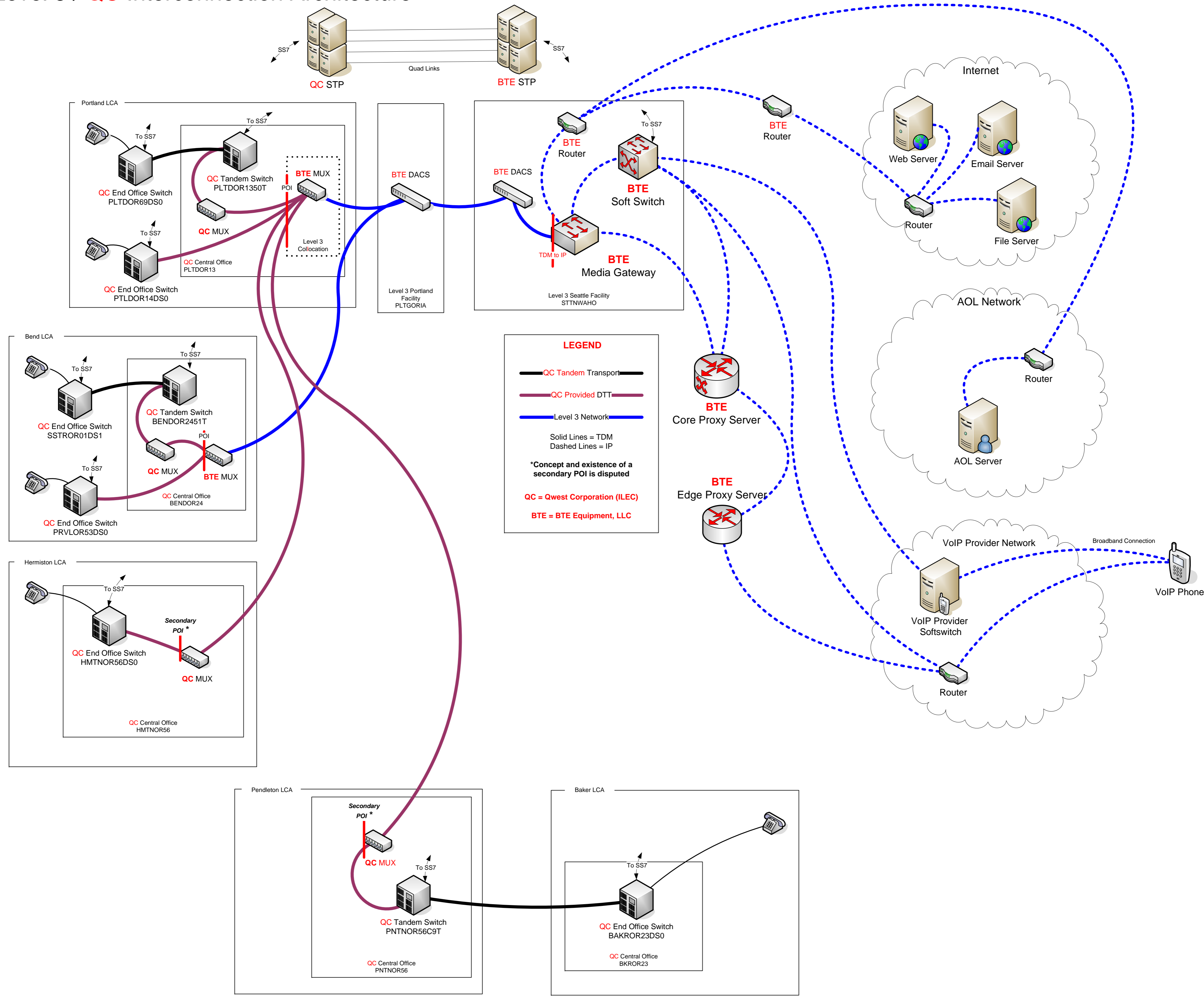
If you or Mr. Booth have any questions, Qwest will be happy to respond to them.

Very truly yours,

Ted D. Smith

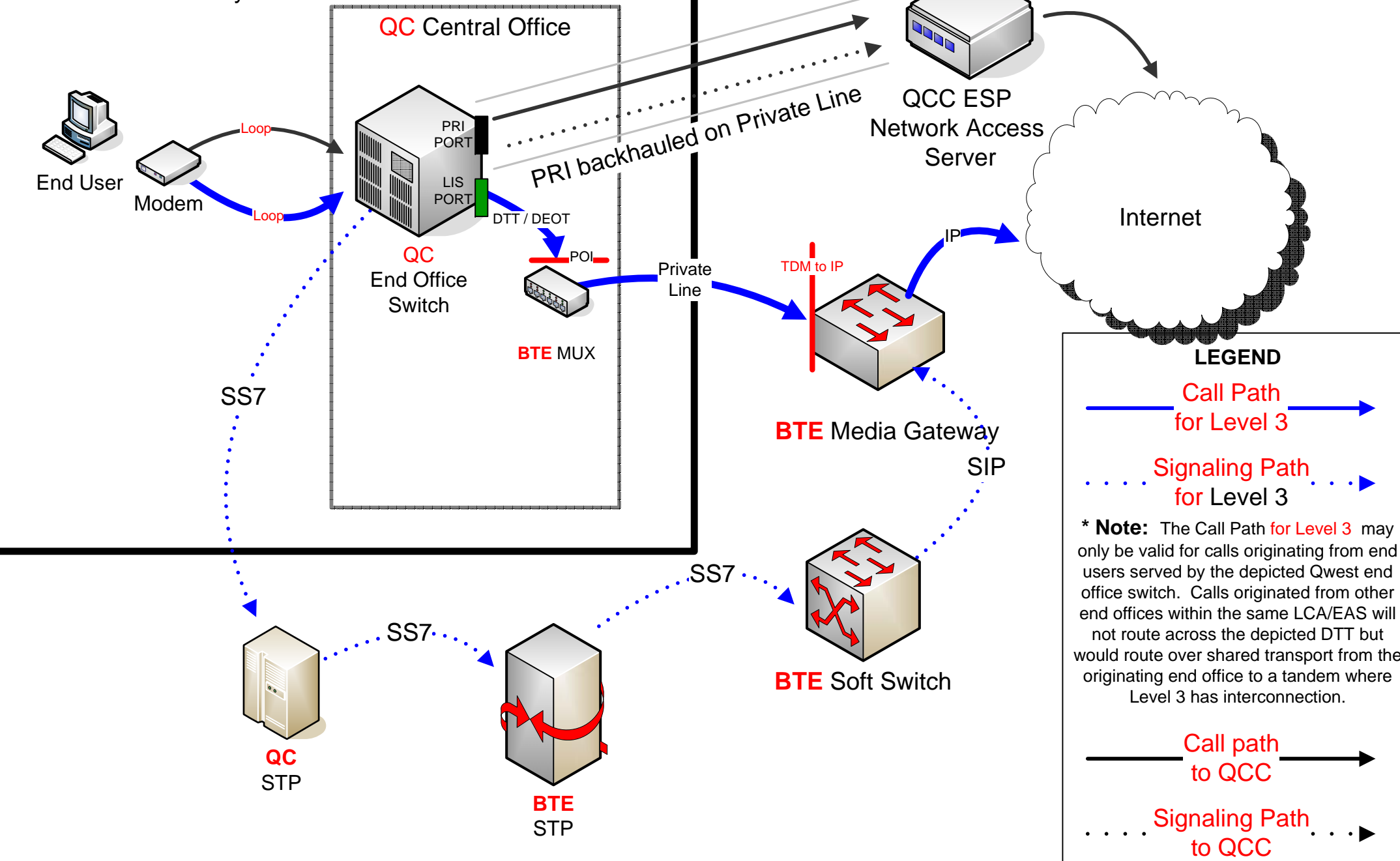
cc: ARB 665 Service List
David Booth
Alex Duarte
Tom Dethlefs
Larry Brotherson
Phil Linse
Bill Easton

Level 3 / QC Interconnection Architecture



QCC Wholesale Dial / Level 3 Managed Modem Comparison

*LCA /EAS Boundary



LEGEND

— Call Path for Level 3 —>

... Signaling Path for Level 3 ...>

* **Note:** The Call Path for Level 3 may only be valid for calls originating from end users served by the depicted Qwest end office switch. Calls originated from other end offices within the same LCA/EAS will not route across the depicted DTT but would route over shared transport from the originating end office to a tandem where Level 3 has interconnection.

— Call path to QCC —>

... Signaling Path to QCC ...>

QCC ESP Network Access Servers provide modem functionality and are located within the LATA.

Switch Ports are the same between LIS and PRI, but software is configured differently

QC = Qwest Corporation (ILEC)

QCC = Qwest Communications Corporation (ESP)

BTE = BTE Equipment, LLC