

August 1, 2008

David Danner
Secretary & Executive Director
WA Utilities & Transportation Commission
1400 S. Evergreen Park Drive S.W.
P.O. Box 40128
Olympia, WA 98504-0128

2008 AUG -5 AM 8:17
RECEIVED
OFFICE OF THE
SECRETARY OF
TRANSPORTATION
AND UTILITIES
COMMUNICATIONS
DIVISION
Via Email to: records@wutc.wa.gov and
FedEx Overnight Mail

Re: AMENDMENT TO PETITION OF INTEGRA TELECOM OF WASHINGTON, INC. FOR
APPROVAL OF AN ALTERNATIVE MEASUREMENT OF SERVICE QUALITY
REPORTING PURSUANT TO WAC 480-120-439(12) – **Docket No. UT-080864**

Dear Mr. Danner:

Enclosed for filing is the original plus 12 copies of the Amendment to the Petition for Alternative Measurement and Reporting under WAC 480-120-439(12) of Integra Telecom of Washington, Inc. This filing has also been made electronically via email to the Commission's Records Center. Please contact the undersigned with any questions or concerns.

Sincerely,



Cathy Murray
Manager, Regulatory Affairs
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Enclosures

Cc: Kristin Russell, WUTC

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BEFORE THE WASHINGTON STATE
UTILITIES AND TRANSPORTATION COMMISSION

IN THE MATTER OF THE PETITION)
OF INTEGRA TELECOM OF) DOCKET NO. UT-080864
WASHINGTON, INC. FOR)
APPROVAL OF AN ALTERNATIVE) AMENDMENT TO PETITION FOR
MEASUREMENT OF SERVICE) ALTERNATIVE MEASUREMENT
QUALITY REPORTING PURSUANT) AND REPORTING UNDER WAC 480-
TO WAC 480-120-439(12)) 120-439(12)

Pursuant to WAC 480-120-439(12), Integra Telecom of Washington, Inc., together with its Washington affiliates (collectively "Integra")¹ has requested that the Washington Utilities and Transportation Commission ("WUTC" or "Commission") grant its Petition for Alternative Measurement and Reporting under WAC 480-120-439. That petition was filed with the Commission May 15, 2008 and assigned Docket No. UT-080864. Integra herein amends its May 15, 2008 petition as follows:

I. ADDITIONAL CONSIDERATION & REQUEST

1. As noted in the original petition, on August 31, 2007, Integra Telecom Holdings, Inc. acquired Eschelon Telecom, Inc. and all its subsidiaries and affiliates. Prior to that, on June 27, 2007, in its Order 01 in Docket UT-061443, the Commission approved, in part, an alternative measurement and reporting format for Eschelon Telecom of Washington, Inc. and its Washington affiliates (Eschelon). Integra has reviewed its resources and processes and has determined that the report content and format that Eschelon negotiated with and had approved by the Commission will also adequately, yet conservatively, represent Integra and its affiliates' overall service quality performance in the State of Washington. Therefore, Integra respectfully requests that it be permitted to

¹ Integra Telecom of Washington, Inc., Electric Lightwave, LLC, Eschelon Telecom of Washington, Inc., Advanced TelCom, Inc., Shared Communications Services, Inc., Washington Telecom d/b/a Oregon Telecom, Inc. and United Communications, Inc. d/b/a UNICOM are separate, wholly-owned subsidiaries of Integra Telecom Holdings, Inc., and are affiliates as defined in WAC 480-120-021. WAC 480-120-034(3) provides that for purposes of classifying a company as Class A or Class B, the number of access lines served by the local exchange company includes the number of access lines served in this state by any affiliate of that local exchange company. Therefore, this Petition encompasses all Integra companies operating in Washington.

adopt, as its own, the alternative measurement and reporting format that has been established with the Commission by Eschelon.

2. As Integra and Eschelon operations become more integrated, it will become increasingly difficult to separate the operating metrics of these two entities. In its initial filing, Integra asked that it be permitted to file the monthly service quality reports on a "total company" basis for its Washington operations. Integra wishes to clarify that the reports that it proposes to prepare and file monthly with the Commission will fully incorporate all its Washington operating affiliates within one set of statistics in each monthly report.

3. Should the Commission grant Integra's request for approval to adopt the alternative measurement and reporting requirements that have been established for the Eschelon entities and the Commission agrees that the operations of all the Washington affiliates can be rolled up into one monthly report, Integra believes that an Order approving Integra's request in the instant proceeding could pose somewhat of a conflict with Order 01 issued in UT-061443 which approved alternative measurements and reporting requirements for Eschelon. Thus, Integra asks that the Commission rescind its Order 01 in Docket No. UT-061443 replacing it concurrently with an Order issued at the conclusion of this proceeding. Integra believes that this administrative action would prevent potential compliance confusion in the future.

II. SAMPLE TOTAL COMPANY MONTHLY REPORT

4. Included with this amendment are sample, total company reports for Integra and its affiliates for the months of May and June 2008, for the Commission's further consideration. Please see Attachment A.

III. CONCLUSION

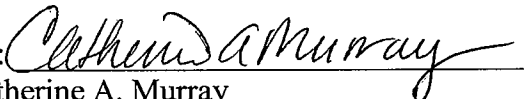
5. For the reasons stated in its May 15, 2008 Petition and given the additional considerations discussed herein, Integra Telecom of Washington, Inc., and its Washington affiliates request that the Commission accept all of the proposed alternative measurements as adequate to meet the Commission's needs under WAC 480-120-439. To summarize, Integra asks that:

- i. it be exempted from WAC 480-120-439(3) with respect to repair appointments;
- ii. it be permitted to report WAC 480-120-439(4) on a statewide basis, with no distinctions as to customer size or whether installation occurred within 5 days;
- iii. it be permitted to report WAC 480-120-439(6) on a statewide basis;
- iv. it be permitted to report all repair types per WAC 480-120-439(9) that the Company can itself complete;
- v. the Commission accept one monthly report representative of the total company, Washington operations of Integra; and
- vi. the Commission rescind Order 01 in Docket No. UT-061443 to be replaced by an Order issued in the instant proceeding.

Respectfully submitted,
Dated: August 1, 2008

By: 

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Attachment A – Page 1

WAC 480-120-439 Monthly Service Quality Performance Report
Integra Telecom of Washington, Inc. & Affiliates

May 2008 Report

Subpart (3) – Missed appointment report (statewide installation data, all orders; includes both off-net and on-net):

Total appointment/commitments made:	393
Appointments/commitments missed:	23

Subpart (4) - Installation or activation of basic service (statewide data, all orders; includes both off-net and on-net):

	<u>30 Days</u>	<u>90 Days</u>	<u>180 days</u>
Orders taken (total commitments made):	393	768	990
Orders completed (commitments met):	370	723	910

Subpart (6) – Summary trouble reports (statewide data; must include both off-net and on-net. Exclusions: troubles due to CPE, inside wire, force majeure, power outages):

Number of ALEs (estimated):	166,301
Ratio of trouble reports per 100 ALEs in service: (ALE equivalent = 1264)	0.76/100
If ratio exceeds 4:100 include explanation of cause(s):	N/A

Subpart (7) and (8) – Integra and its affiliates met or exceeded the network performance standards.

Subpart (9) - Repair report (must include both off-net and on-net. Exclusions: troubles due to CPE, inside wire, force majeure, power outages):

Total service interruptions (e.g., no dial tone) reported:	447
Less exclusions	(32)
Total service interruptions	415
Service interruptions cleared in 48 hours:	404
Service interruptions cleared after 48 hours:	11
Total service impairments (e.g., malfunctioning features) reported:	529
Less exclusions	(47)
Total service impairments	482
Service impairments cleared in 72 hours:	470
Service impairments cleared after 72 hours:	12

Attachment A – Page 2

WAC 480-120-439 Monthly Service Quality Performance Report
Integra Telecom of Washington, Inc. & Affiliates

June 2008 Report

Subpart (3) – Missed appointment report (statewide installation data, all orders; includes both off-net and on-net):

Total appointment/commitments made:	374
Appointments/commitments missed:	27

Subpart (4) - Installation or activation of basic service (statewide data, all orders; includes both off-net and on-net):

	<u>30 Days</u>	<u>90 Days</u>	<u>180 days</u>
Orders taken (total commitments made):	374	691	890
Orders completed (commitments met):	347	633	825

Subpart (6) – Summary trouble reports (statewide data; must include both off-net and on-net. Exclusions: troubles due to CPE, inside wire, force majeure, power outages):

Number of ALEs (estimated):	166,419
Ratio of trouble reports per 100 ALEs in service: (ALE equivalent = 1181)	0.71/100
If ratio exceeds 4:100 include explanation of cause(s):	N/A

Subpart (7) and (8) – Integra and its affiliates met or exceeded the network performance standards.

Subpart (9) - Repair report (must include both off-net and on-net. Exclusions: troubles due to CPE, inside wire, force majeure, power outages):

Total service interruptions (e.g., no dial tone) reported:	395
Less exclusions	(27)
Total service interruptions	368
Service interruptions cleared in 48 hours:	359
Service interruptions cleared after 48 hours:	11
Total service impairments (e.g., malfunctioning features) reported:	467
Less exclusions	(39)
Total service impairments	428
Service impairments cleared in 72 hours:	417
Service impairments cleared after 72 hours:	11