

**BEFORE THE WASHINGTON  
UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of the Petition of	)	
	)	DOCKET NO. UT-121994
FRONTIER COMMUNICATIONS	)	
NORTHWEST INC.,	)	
	)	
To be Regulated as a Competitive	)	PETITION TO INTERVENE OF
Telecommunications Company Pursuant to	)	INTEGRA
RCW 80.36.320	)	
	)	

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Pursuant to WAC 480-07-355, Integra Telecom of Washington, Inc., on behalf of itself and its affiliates<sup>1</sup> (“Integra”), hereby petitions the Commission for leave to intervene in the above-entitled docket. As grounds for intervention, Integra states as follows:

The name, address, and telephone number of the persons to whom communications should be addressed is:

Douglas Denney  
Vice President, Costs & Policy  
Integra Telecom  
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Integra is a registered and competitively classified telecommunications company authorized to provide both intraexchange and interexchange telecommunications services throughout Washington. Integra currently competes with Frontier in the Frontier service territory.

Integra has an interest in this case. Integra uses its own facilities along with facilities leased from Frontier in order to provide service to business customers in the Frontier service territory. Because Integra leases, in part, facilities from Frontier in order to provide service,

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<sup>1</sup> Integra affiliates operating in Washington are: Eschelon Telecom of Washington, Inc., Electric Lightwave, LLC., Advanced TelCom Inc., and United Communications, Inc.

Integra's ability to compete is dependent upon the prices, terms, conditions, and service quality provided by Frontier to Integra.<sup>2</sup> Frontier's performance in this regard affects Integra's ability to make functionally equivalent or substitute services readily available at competitive rates, terms, and conditions. Integra's recent experience with Frontier's performance is relevant to this case and should aid the Commission in reviewing Frontier's petition. Integra seeks to participate in this proceeding to ensure that changes, if any, in Commission oversight of Frontier in Washington will not adversely impact Integra's ability to compete in Washington.

The evidence, if any, and briefing presented by Integra will be of material value to the Commission in its determination of the issues involved in this proceeding, and Integra's intervention will not broaden those issues or delay the proceedings.

WHEREFORE, Integra prays for leave to intervene as a party to this proceeding, with a right to discovery, to have notice of and appear at the taking of testimony, to produce and cross-examine witnesses, and to be heard in person or by counsel on brief and at oral argument.

RESPECTFULLY SUBMITTED



this 7th day of February, 2013.

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<sup>2</sup> See Frontier Communications Northwest Inc.'s Petition For Approval of Minimal Regulation in Accordance with RCW 80.36.320, Docket No. UT-121994, December 21, 2012, ¶¶ 34-35.