

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

Rulemaking to consider amending rules in)	
WAC 480-120, Telephone Companies,)	
WAC 480-121, Registration and)	
Competitive Classification of)	
Telecommunications Companies, WAC)	
480-122, Washington Telephone)	
Assistance Program, WAC 480-123)	DOCKET NO. UT-140680
Universal Service, WAC 480-140,)	
Commission General – Budgets, and WAC)	
480-143, Commission General – Transfers)	
of Property, due to competitive changes)	
within the telecommunications to meet)	
consumer, commission and industry)	
requirements no longer applicable under)	
the existing WAC rules)	
.....)	

COMMENTS OF JOINT CLECS

Integra Telecom of Washington, Inc., on behalf of itself and its affiliates¹ (“Integra”) and XO Communications Services LLC (“XO”) (collectively “Joint CLECs”) respectfully provide these comments regarding the proposed rules.²

Background

Integra is a facilities-based competitive local exchange carrier (“CLEC”) providing communications services in the western United States, including Washington.

¹ Integra affiliates operating in Washington are: Integra Telecom of Washington, Inc., Electric Lightwave, LLC., Eschelon Telecom of Washington Inc., Advanced TelCom, Inc., Shared Communications Services, Inc., Oregon Telecom Inc., and United Communications, Inc.

² Notice of Opportunity to Submit Written Comments, UT-140680, December 5, 2014.

XO is also a facilities-based CLEC providing competitive voice, data and internet broadband services to small, medium and large business customers in Washington and across the country.

The Joint CLECs appreciate the Commission's thoughtful approach in its comprehensive review of Commission rules pertaining to telecommunications companies and support the Commission's proposed rules.

Each Joint CLEC has invested significantly in its own network in Washington, but in many cases CLECs continue to rely on wholesale services purchased from incumbent carriers such as CenturyLink and Frontier. These wholesale services, combined with the Joint CLEC network, result in final products sold to end user customers. The incumbent carriers have a dual role as both a critical wholesale provider and large retail competitor to the Joint CLECs. The Joint CLECs are concerned that without proper safeguards in place, reduced regulatory oversight could provide the incumbent carriers with a greater opportunity to exploit its position as both a wholesale provider and retail competitor.

The Joint CLECs support the Commission's proposed rules and believe the rules adequately balance the desire for relaxed regulation and the need for continued Commission oversight of the communications marketplace. For example, the proposed rules relax service quality reporting requirements, while maintaining service quality standards.

The Joint CLECs appreciate the opportunity to provide feedback on the proposed rules and plan to participate in the Adoption Hearing on February 12, 2015.

RESPECTFULLY SUBMITTED,



Dated: January 6, 2015.

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