

December 30, 2008

Via Email and Overnight Express Mail
records@wutc.wa.gov

David W. Danner, Executive Director and Secretary
Washington Utilities & Transportation Commission
1300 S. Evergreen Park Drive SW
P.O. Box 47250
Olympia, WA 98504-7250

Re: In the Matter of the Petition of Verizon Northwest, Inc., For Approval of an Addition to its Non-Impaired Wire Center List
Docket UT-083060

Dear Mr. Danner:

Integra Telecom and its affiliates (Integra) and 360networks (USA) inc. (Joint CLECs) provide these comments in response to the Commission's November 25, 2008 *Notice of Opportunity to File Written Comments* ("Notice"). The Joint CLECs operate across the western states with a significant presence in Washington and serve customers in the Halls Lake wire center at issue in this docket.

The Joint CLECs request the Commission to establish a protective order in this docket that will allow them and other interested CLECs the opportunity to review Verizon's data in support of its request to classify Halls Lake as a tier 2 wire center.¹ A protective order such as was used in the review of Qwest's proposed changes to the Non-Impaired wire center list would be acceptable.²

In addition to the confidential information Verizon provided in its November 17, 2008 *Proposed Wire Center Designation* ("Proposal"), Verizon should also provide the following information to requesting parties:

- (1) Carrier specific loop counts broken down between 2-wire, DS1 and DS3 loops and 2-wire, DS1 and DS3 EELs (and any other loop count category that Verizon included in its loop counts).
- (2) An indication whether or not the carriers identified above are collocated in the Halls Lake wire center.

¹ Integra recently requested the confidential information Verizon filed with its November 17, 2008 *Proposal*, but as of the filing of these comments Verizon has not responded to this request.

² *Order 07, Protective Order*, In the Matter of the Petition of Qwest Corporation For Commission Approval of 2007 Additions to Non-Impaired Wire Center List, Docket No. UT-073033, March 21, 2008 (available at: <http://www.wutc.wa.gov/rms2.nsf/vw2005OpenDocket/FD3322F18F4AFBE3882574130058E152>).

- (3) Verification that all line counts represent end of year 2007 lines and if not an explanation of the vintage of each data component used.
- (4) A description of any adjustments and/or calculations that Verizon made to line counts in order to produce the lines confidential line counts filed with Verizon's *Proposal*.
- (5) The source of the line count data Verizon used in its *Proposal*.
- (6) Any other data Verizon determines would be useful in facilitating CLEC review of the line count data.

The Joint CLECs anticipate that they can complete a review of Verizon's confidential line count data and indicate whether or not they have any issues with Verizon's proposal within 30 days of receipt of this information.

Sincerely,



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