

August 24, 2015

Via Web Portal

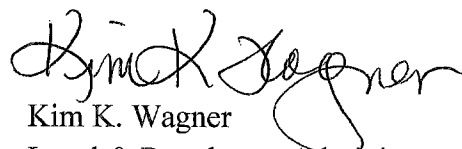
Steven V. King
Secretary and Executive Director
WA Utilities and Transportation Commission
1300 S. Evergreen Park Drive SW
P.O. Box 47250
Olympia, WA 98504

RE: RULEMAKING TO CONSIDER ADOPTION OF RULES TO IMPLEMENT RCW CH.
80.54, RELATING TO ATTACHMENTS TO TRANSMISSION FACILITIES
WUTC Docket No. U-140621

Dear Mr. King:

Enclosed for filing in the above docket are the Comments of Integra Telecom of Washington, and its affiliates.

Sincerely,



Kim K. Wagner
Legal & Regulatory Administrator
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Enclosure

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

Rulemaking to Consider Adoption of Rules)	
to Implement RCW Ch. 80.54, Relating to)	DOCKET NO. U-140621
Attachments to Transmission Facilities,)	
Docket U-140621)	
.....)	

COMMENTS OF INTEGRA

Integra Telecom of Washington, Inc., on behalf of itself and its affiliates¹ (“Integra”), respectfully provides this response to the Commission’s request for written comments² on the Proposed Rules implementing chapter 80.54 RCW (“Proposed Rules”).³

Introduction

Integra is a facilities-based competitive local exchange carrier (“CLEC”) and has participated in this rulemaking in order to enhance its ability to place attachments and to promote reasonable and predictable timeframes associated with attachments.⁴ Though the Proposed Rules do not adopt all of Integra’s recommendations, Integra believes the Proposed Rules balance the various and disparate positions of the parties and should be adopted at this time.

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., United Communications, Inc., and World Communications Inc.

² *Notice of Opportunity to Submit Written Comments on Proposed Rules*, Rulemaking to Consider Adoption of Rules to Implement RCW 80.54, Relating to Attachments to Transmission Facilities, Docket U-140621, July 24, 2015.

³ The latest version of the Proposed Rules implementing chapter 80.54 RCW are available at www.utc.wa.gov/140621.

⁴ See Comments of Integra, Docket U-140621, October 8, 2014; Comments of Integra, Docket U-140621, February 6, 2015; and Comments of Integra Docket U-140621, April 17, 2015.

Discussion

The Proposed Rules are the product of a multi-stake holder process. There were seven rounds of comments with 70 submissions from the parties. All parties had multiple opportunities to communicate their positions and the latest version of the proposed rules balance the disparate positions of the parties and should be adopted.

The Proposed Rules strike a balance that appears to meet the goal of the Commission to adopt just and reasonable attachment rules, and Integra does not believe there is a need to adjust the rules further.

Conclusion

Integra appreciates the opportunity to participate in this rulemaking and supports the adoption of the Proposed Rules. Implementation of clear, predictable, just, and reasonable rules for attachments should ultimately increase competition and benefit consumers in Washington.

RESPECTFULLY SUBMITTED,



Dated: August 24, 2015.

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