

1 **BEFORE THE WASHINGTON STATE**
2 **UTILITIES AND TRANSPORTATION COMMISSION**

3 INTEGRA TELECOM OF WASHINGTON,
4 INC.,

5 a Washington corporation,

6 Complainant,

7 v.

8 VERIZON NORTHWEST, INC.,

9 Respondent

DOCKET NO. 053038

UNOPPOSED MOTION TO REVISE
SCHEDULE ("AGREED REQUEST")

EXPEDITED CONSIDERATION
REQUESTED

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1 UNOPPOSED MOTION TO REVISE SCHEDULE

Integra Telecom of Washington, Inc.
1201 NE Lloyd Blvd., Ste. 500
Portland, OR 97232
Phone: (503) 453-8000
Fax: (503) 453-8221

Pursuant to WAC 480-07-0385, Complainant Integra Telecom of Washington, Inc. (“Integra”) moves for an order of the Commission modifying the schedule that the Commission adopted in the Prehearing Conference Order dated August 11, 2005. Integra recently discovered another customer that Integra intends to add to its complaint in this docket and intends to file an unopposed motion to amend complaint soon. Additionally, Verizon has not yet responded to either of the two sets of data requests issued by Integra to Verizon although the deadline for responding has passed. Accordingly, Integra will not be able to file its opening testimony on September 9, 2005 as required by the current schedule. Integra asks that the Commission modify the schedule as set forth below (dates to be changed are shown in redline; all other dates remain the same):

EVENT	DATE	INTERVAL
Integra filing date	September 12 <u>23</u> , 2005	
Verizon response filing	October 12 <u>24</u> , 2005	31 days
Rebuttal filing	November 14 <u>23</u> , 2005	33 <u>0</u> days
Settlement conference	November 29, 2005	15 days
Hearing	December 20, 2005	21 days
Initial briefs	January 17, 2005	28 days
Responsive briefs	January 31, 2005	14 days

Verizon does not oppose the proposed revisions to the schedule.

Integra cautions that the proposed revised schedule depends on Verizon’s cooperation in providing discovery responses. If Integra is not provided discovery responses in sufficient time to prepare its opening testimony in advance of the proposed September 23 deadline, Integra will be forced to consider further revisions to the schedule. Although Integra is optimistic that the

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1 parties can resolve any discovery dispute, Integra does not waive, and expressly reserves, its
2 right to present any discovery dispute, including Verizon's waiver of all objections by virtue of
3 its untimely responses, to the Commission for resolution.

4 Dated this 1st day of September, 2005.

5 INTEGRA TELECOM

6 
7 By: _____
8 John P. (Jay) Nusbaum

CERTIFICATE OF SERVICE

I hereby certify that I have this day served this document upon all parties of record in this proceeding by the following method(s):

- In person;
- By mail, properly addressed with first class postage prepaid;
- By delivering to a commercial parcel delivery company and making or arranging payment of the pertinent fee;
- By telefacsimile transmission, if other forms of service are waived;
- By electronic mail, if other forms of service are waived.

DATED at Portland, OR this 1st day of September, 2005.

INTEGRA TELECOM OF WASHINGTON, INC.

By: 

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