BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of the Petition of) DOCKET NO. UT-132282
QWEST CORPORATION d/b/a CENTURYLINK QC)))
For Commission Approval of 2013 Additions to its Non-Impaired Wire Center) PETITION TO INTERVENE OF INTEGRA
List)

Pursuant to WAC 480-07-355, Integra Telecom of Washington, Inc., on behalf of itself and its affiliates¹ ("Integra"), hereby petitions the Commission for leave to intervene for the limited purpose described below 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 1201 NE Lloyd Blvd., Suite 500 Portland, OR 97232 dkdenney@integratelecom.com

Direct: 503-453-8285 Fax: 503-453-8223

Integra is a registered and competitively classified telecommunications company authorized to provide both intraexchange and interexchange telecommunications services

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

throughout Washington. Integra currently competes with CenturyLink primarily in the legacy

Qwest service territory.

Integra has an interest in this case. Integra uses its own facilities along with facilities

leased from CenturyLink, including unbundled network elements, in order to provide service

to business customers in the CenturyLink service territory. Because Integra leases, in part,

unbundled network elements from CenturyLink in order to provide service, Integra's ability to

compete is dependent upon the availability of these facilities.

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,

Dated: January 10, 2014.

Douglas Denney

Vice President, Costs & Policy

Integra

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