

BEFORE THE WASHINGTON STATE  
UTILITIES AND TRANSPORTATION COMMISSION

IN THE MATTER OF THE PETITION )  
OF INTEGRA TELECOM OF ) DOCKET NO. UT-08\_\_\_\_\_  
WASHINGTON, INC. FOR )  
APPROVAL OF AN ALTERNATIVE ) PETITION FOR ALTERNATIVE  
MEASUREMENT OF SERVICE ) MEASUREMENT AND REPORTING  
QUALITY REPORTING PURSUANT ) UNDER WAC 480-120-439(12)  
TO WAC 480-120-439(12) )

Pursuant to WAC 480-120-439(12), Integra Telecom of Washington, Inc., together with its Washington affiliates (collectively “Integra”)<sup>1</sup> hereby request that the Washington Utilities and Transportation Commission (“WUTC” or “Commission”) grant this Petition for Alternative Measurement and Reporting under WAC 480-120-439. As grounds therefore, Integra states as follows:

I. INTRODUCTION

1. Through the acquisition of Eschelon Telecom, Inc. by its parent company<sup>2</sup> Integra may have reached the threshold of a “Class A” telecommunications provider under the Commission’s Rules. Class A companies are required to provide certain service quality reports to the WUTC on varying schedules (*e.g.*, monthly, quarterly, bi-annually).

2. On August 31, 2007, Integra Telecom Holdings, Inc. acquired Eschelon Telecom, Inc. and all its subsidiaries and affiliates. Prior to that, on June 27, 2007, in its Order 01 in Docket UT-061443, the Commission approved, in part, an alternative measurement and reporting format for Eschelon Telecom of Washington, Inc. and its

---

<sup>1</sup> Integra Telecom of Washington, Inc., Electric Lightwave, LLC, Eschelon Telecom of Washington, Inc., Advanced TelCom, Inc., Shared Communications Services, Inc., Washington Telecom d/b/a Oregon Telecom, Inc. and United Communications, Inc. d/b/a UNICOM are separate, wholly-owned subsidiaries of Integra Telecom Holdings, Inc., and are affiliates as defined in WAC 480-120-021. WAC 480-120-034(3) provides that for purposes of classifying a company as Class A or Class B, the number of access lines served by the local exchange company includes the number of access lines served in this state by any affiliate of that local exchange company. Therefore, this Petition encompasses all Integra companies operating in Washington.

<sup>2</sup> Integra Telecom Holdings, Inc.

Washington affiliates (Eschelon). Integra has reviewed its resources and processes and has determined that the report content and format that Eschelon negotiated with and had approved by the Commission will also adequately, yet conservatively, represent Integra and its affiliates' overall service quality performance in the State of Washington. Therefore, Integra respectfully requests that it be permitted to adopt, as its own, the alternative measurement and reporting format that has been established with the Commission by Eschelon.

3. As the Commission has previously recognized in other petitions under WAC 480-120-439(12),<sup>3</sup> the service quality measurements and reporting requirements of WAC 480-120-439 are based principally upon a facilities-based, legacy network architecture that is inconsistent with CLEC networks and the provision of CLEC services. For example, many requirements mandate both measurement and reporting based upon central offices.<sup>4</sup> Integra does not employ central offices as that term is traditionally defined and used in the rule. Other measurements do not contemplate Integra's reliance upon the underlying incumbent local exchange carrier ("ILEC") to obtain the necessary inputs for its service along with the installation intervals required by the ILEC.<sup>5</sup>

4. In an effort to keep costs in check, Integra attempts to standardize and automate as many internal business reporting and information gathering operations as possible. The standardization of measurements and reporting allows Integra to automate the reporting and produce the reports at a lesser cost than if it had to manually pull out unique information from its systems for each of the eight states it currently serves.

5. Consequently, Integra cannot reasonably replicate a number of the measurements and thus cannot produce the related reports required under the rule. Nevertheless, the proposed alternatives already granted to Eschelon provide the Commission with substantive performance standards based upon Integra's actual network and its service as it is provisioned in Washington.

6. For these reasons, Integra seeks the alternative method of performance reporting that has been granted to Eschelon and that is consistent with its systems

---

<sup>3</sup> See, Order No. 01, Docket No. UT-041588 and Order No. 01, Docket No. UT-060502.

<sup>4</sup> See e.g., WAC 480-120-439(4); WAC 480-120-439(6).

<sup>5</sup> See e.g., WAC 480-120-439(3) and (4) (describing installation and repair intervals some of which cannot be met by carriers provisioning service via UNE and UNE-Loop).

capabilities. As described more fully below, Integra proposes to provide the detail requested to the extent that such information is reasonably available.

7. Integra Telecom of Washington, Inc., Electric Lightwave, LLC, Eschelon Telecom of Washington, Inc. and Advanced TelCom, Inc.<sup>6</sup> are separate wholly-owned subsidiaries of Integra Telecom Holdings, Inc., and are affiliates as defined in WAC 480-120-021. WAC 480-120-034(3) provides that for purposes of classifying a company as Class A or Class B, the number of access lines served by the local exchange company includes the number of access lines served in this state by any affiliate of that local exchange company. Thus, as a point of clarification, Integra would also ask that it be permitted to file those reports the Commission finds necessary on a “total company” basis for its Washington operations.

8. Integra provides greater detail regarding its compliance issues in its discussion of the specific rules and proposes alternative measurements for those rules, below. The Company believes that its proposals will provide the Commission with useful and relevant service quality information. Integra proposes that its monthly reports to the Commission be similar to the sample which is attached hereto and is based on the monthly reports that Eschelon has been submitting to date. For the reasons stated herein, Integra requests that the Commission grant this Petition for reporting modifications and/or alternative measurements.

## II. SPECIFIC RULES AND ALTERNATIVE MEASUREMENT PROPOSALS

### A. WAC 480-120-439(3) – Missed Appointment Report

9. The Missed Appointments Report directs carriers to report the total number of appointments made, appointments missed and appointments excluded. The report must be broken down into two parts: one for installations and one for repairs.

10. In general, Integra does not dispatch a truck or technician to install or repair customer services which are the subject of WAC 480-120-439(3); i.e., services up

---

<sup>6</sup> Shared Communications Services, Inc. (Shared), Oregon Telecom, Inc. (OTI) and UNICOM offered UNE-P and resold services. While there are customers in the Company’s accounting and billing records still recognized as Shared, OTI or UNICOM customers, there are no current operations being conducted by these Integra affiliates.

to the demarcation point or network interface unit (NIU), rather those functions are assumed by the underlying ILEC in accordance with an approved interconnection agreement, and in the case of Qwest, consistent with the Performance Assurance Plan (“PAP”) approved by this Commission. Integra knows only what the underlying ILEC reports and that report does not include information regarding any exceptions or the need for actual dispatch to the customer premises.

11. Given the parameters within which many CLECs, including Integra, must operate when employing the underlying facilities of the ILEC, the Company must negotiate and set installation and conversion dates with its customers in accordance with the intervals set out in the interconnection agreement. Therefore, Integra should be judged according to the accuracy with which it determines, and commits to, these dates. (Please see discussion in Section B, below.)

12. In the course of business, Integra tracks the commitments it makes to its customers for the installation of, or conversion to, Integra services. The Company can report the total number of these commitments scheduled and the number of commitments met. Integra, however, does not currently track the number of exclusions, as defined in 480-120-439(3) (b) (c) and (d). Because of the resources required for the Company to alter its systems and processes, Integra requests that it be permitted to report its installation/conversion commitments met, as will be described in Section B., below.

13. As is the case with installations, Integra relies on the underlying ILEC for repair dispatches for services to the customer’s demarcation point. Eschelon currently tracks the “end result” of its repair performance. (Please see discussion in Section D., below). In order to report missed repair appointments, Integra would be faced with significant process and system changes. Because of the resources required for the Company to alter its systems and processes, Integra requests that it be permitted to report its overall repair performance as described in Section D.

14. Integra believes that its reporting of commitments met and overall repair performance will provide the Commission with an adequate picture of the Company’s responsiveness to its customers’ needs and that Integra should be exempted from the missed appointment reporting requirements of WAC 480-120-439(3).

B. WAC 480-120-439(4) – Installation or Activation of Basic Service Report

15. The Installation or Activation of Basic Service Report essentially requires that carriers report monthly: (a) the total orders taken by central office for orders of five or fewer access lines; (b) of those orders, the total orders uncompleted in 5 business days (though the standard, WAC 480-120-105, is waived for CLECs); and (c) the total number of orders, by central office, incomplete in 90 days and the total number of orders incomplete in 180 days. This rule, by its own terms, applies to residential customers and small businesses and addresses only the provision of basic local exchange service for five or fewer lines.

16. First, the rule requires reporting based on central offices. As stated, Integra does not employ central offices. Integra can comply with this portion of the rule on a statewide basis as opposed to a central office basis and asks that the Commission permit it to do so.

17. Second, Integra does not have a system in place to distinguish between orders placed for five or fewer access lines and those for more than five access lines. Accordingly, Integra proposes to report on all orders regardless of the number of access lines requested. While allowing Integra to report in this manner may over-report installations not completed in accordance with the required timelines, it is the most workable solution given the information available.

18. Third, by default, all orders for installation of new service from CLECs, including Integra, will fall outside the 5-day window established in WAC 480-120-105. As noted earlier, Integra will, of necessity, negotiate and set installation and conversion dates with its customers in accordance with the intervals set out in the interconnection agreements. Most of Integra's customers typically make their telecommunications plans months in advance. Thus, Integra requests that the Commission permit it to incorporate all commitments made and met on monthly, quarterly (90-days) and semi-annually (180-days) bases.

19. As a consequence, Integra requests that the Commission accept Integra's alternative reporting measures for all its customers in response to WAC 480-120-439(4), subparts (a), (b) and (c) statewide.

C. WAC 480-120-439(5) – Major Outages Report

20. Integra has already set up an internal process so that its Regulatory Affairs staff is made aware of major outages and can then report such incidents to the Commission.

D. WAC 480-120-439(6) – Trouble Reports.

21. The Trouble Reports rule requires generally that each month carriers must submit reports disclosing the total number of troubles by central office, the total number of lines served by the central office and the ratio per 100 lines. In addition, the rule requires that the carriers provide the “cause” of the trouble when the number of trouble reports exceeds the benchmark in WAC 480-120-438, the standard developed to measure troubles.

22. Here again, Integra cannot report the standard on a central office basis. The Company can, however, report the total number of troubles statewide and the ratio per one hundred lines in service for all customers in Washington. Integra requests that the Commission accept this alternative measurement.

E. WAC 480-120-439(7) and (8) – Switching Report and Interoffice, Intercompany and Interexchange Trunk Blocking Report

23. Integra does not provide service (direct trunking) to interexchange carriers. The Company does monitor and track its network performance with respect to switching (dial service) and interoffice facilities and has developed internal reporting protocol to comply with these sections of the rule.

F. WAC 480-120-439(9) – Repair Report.

24. The repair reporting requirement essentially provides that a carrier must report monthly, the total number of service “interruptions and impairments” reported to it each month. Service “interruptions and repairs” are basically divided, under the relevant standard, into two types of repairs: (a) out-of-service problems and repairs; and (b)

service impairment problems and repairs.<sup>7</sup> Of these two types of repairs, the carrier must report out-of-service repairs completed within 48 hours and those completed outside of 48 hours. For impairments, as opposed to out of service events, the carrier must report the number of troubles repaired within 72 hours and the number repaired in more than 72 hours. Also, for each type of repair (out-of-service or impairment), the carrier must report the number of interruptions reported which are exempt from the standards set in WAC 480-120-440(1).

25. Here again, Integra must generally rely on the underlying ILEC to meet these standards, and the Company is generally bound by any performance standards such as the PAP imposed upon the underlying ILEC. With that caveat in mind, Integra's systems, as designed today, can report the percent of out-of-service repairs it can itself fix within the 48- or 72-hour parameters.

G. WAC 480-120-439(10) – Business Office and Repair Answering System Reports.

26. Integra currently exceeds the standard required by 480-120-133 (Response time for calls to business office or repair center during normal business hours). If requested, the Company will provide to the Commission the same internal reports to management concerning average speed of answer, transfers to live representatives, station busies and unanswered calls.

---

<sup>7</sup> WAC 480-120-440.

### III. CONCLUSION

27. For the reasons stated herein, Integra Telecom of Washington, Inc., and its Washington affiliates request that the Commission accept all of the proposed alternative measurements as adequate to meet the Commission's needs under WAC 480-120-439. To summarize, Integra asks that it be:

- i. exempted from WAC 480-120-439(3) with respect to repair appointments;
- ii. permitted to report WAC 480-120-439(4) on a statewide basis, with no distinctions as to customer size or whether installation occurred within 5 days;
- iii. permitted to report WAC 480-120-439(6) on a statewide basis;
- iv. permitted to report all repair types per WAC 480-120-439(9) that the Company can itself complete.

Respectfully submitted,  
Dated: May 14, 2008

By: \_\_\_\_\_  
Dennis D. Ahlers  
Associate General Counsel  
Integra Telecom, Inc.  
730 2nd Avenue South, Suite 900  
Minneapolis, MN 55402-2456  
(612) 436-6692 (direct)  
(612) 436-6816 (department fax)  
[ddahlers@integratelecom.com](mailto:ddahlers@integratelecom.com)

By: \_\_\_\_\_  
Catherine A. Murray  
Manager, Regulatory Affairs  
Integra Telecom, Inc.  
730 2nd Avenue South, Suite 900  
Minneapolis, MN 55402-2456  
(612) 436-1632 (direct)  
(612) 436-6816 (department fax)  
[camurray@integratelecom.com](mailto:camurray@integratelecom.com)