

1 Deborah Harwood, WSBA #13137  
2 Karen J. Johnson, WSBA #26875  
3 Integra Telecom of Washington, Inc.  
4 19545 NW Von Neumann Drive, Suite 200  
5 Beaverton, Oregon 97006

6  
7 **BEFORE THE WASHINGTON STATE**  
8 **UTILITIES AND TRANSPORTATION COMMISSION**

9 **In the Matter of the Petition of** )  
10 **QWEST CORPORATION** ) **Docket No. UT - 030614**  
11 )  
12 **For Competitive Classification of** )  
13 **Basic Business Exchange** )  
14 **Telecommunications Services** )

15 **AFFIDAVIT IN SUPPORT OF JOINT MOTION TO REQUIRE STAFF TO RE-**  
16 **SURVEY AND RECOMPLIE CLEC DATA, OR TO DIREGARD RESULTS OF**  
17 **PREVIOUS CLEC SURVEY AND DATA COMPILATION**

18 I, **DOUG COURTNEY**, after being duly sworn on oath, state:

19 1. I am employed as the Business Manager for PBX and CPE for Integra Telecom of  
20 Washington, Inc. ("Integra"); that I have read the following Affidavit, have personal knowledge of the facts  
21 set forth therein, and that to the best of my knowledge the facts are true and accurate.

22 2. Integra is a competitive local exchange carrier authorized to provide local exchange and  
23 long distance services in the State of Washington. Integra is a party in the above-entitled docket and  
24 received Order No. 6 requiring the disclosure of information related to its services and access lines in the  
25 State of Washington. This information is Highly Confidential to Integra. Staff provided a worksheet and a  
contact for questions, staff member, Tom Wilson. All responses were to be returned to Mr. Wilson in hard  
copy and electronically. Pursuant to Order No. 6, Staff was to obtain and aggregate the data gathered  
from the party CLECs and all CLECs providing services in the State of Washington.

3. I gathered the information for Integra and made the entries on the Staff provided  
worksheet.

4. I spoke with Tom Wilson on two occasions after receipt of Order No. 6 relative to some  
issues in formatting.

1           5.       I never discussed deleting digital services with Mr. Wilson and, from the form of the  
2 Worksheet, did not believe I should delete digital services.

3           6.       Integra filed the Staff Worksheet on July 25, 2003.

4           7.       Integra received the information from Qwest on or about July 23, 2003. I worked with our  
5 Carrier Services Department to certify all services, analog and digital, as shown on the information on the  
6 spreadsheet from Qwest. Integra filed its certification of the Qwest spreadsheet on July 30, 2003.

7           8.       On September 29 and 30, 2003, I completed my review of the information on the Staff  
8 Worksheet and on the Qwest spreadsheet that I had previously submitted. The information that I  
9 gathered included both analog and digital services. I deleted all digital services and prepared revisions of  
10 the Staff Worksheet and the Qwest spreadsheet. The information contained on both the Staff Worksheet  
11 and the Qwest spreadsheet is Highly Confidential to Integra and is available only for review by Staff and  
12 Public Counsel.

13           9.       Integra filed the Supplement Responses on September 30, 2003.

14 Further affiant sayeth naught.

15 Date: \_\_\_\_\_

16 \_\_\_\_\_

17 STATE OF OREGON                    )  
18 COUNTY OF WASHINGTON            ) ss

19           The undersigned, a notary public for and in the State and County aforesaid DOES HEREBY CERTIFY that  
20 DOUG COURTNEY, personally known to me to be the same person whose name is subscribed to the foregoing  
21 instrument appeared before me on this day and acknowledged that he signed and delivered the foregoing instrument  
22 of his own free and voluntary will, and delivered such instrument for the uses and purposes therein set forth.

23 Given under my hand and seal this \_\_\_\_ day of October, 2003.

24 \_\_\_\_\_  
25 Notary Public

My commission expires: \_\_\_\_\_

(Seal)