

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

In the Matter of the Petition of	)	DOCKET NO. UT-030614
	)	
QWEST CORPORATION	)	
	)	RESPONSE TO COMMISSION
For Competitive Classification of	)	REQUEST FOR INFORMATION IN
Basic Business Exchange	)	ORDER NO. 16
Telecommunications Services	)	
.....	)	

Integra Telecom of Washington, Inc. submits the following in Response to the Commission's requests for additional information set forth in Order No. 16:

- A description of all criteria regarding analog and digital services that you applied when originally replying to Order No. 06;

Integra Telecom of Washington, Inc. assumed that Staff had developed the methodology for obtaining data as set forth in the Commission's Order No. 8 in the above-entitled docket, so we responded to the information as requested on the Data Spreadsheets.

We first identified Integra's Co-Location Central Office Wire Centers located in Washington State as of December 31, 2002 and the circuit count for each Central Office, which was sorted by service type (HC for Digital, LX for Analog, and UB for ISDN). The information was based upon our Carrier Service Billing Records including our invoices from Qwest.

A column (F), labeled 'Number of DS1 Circuits' was added to the CLEC+DATA+REQUEST spreadsheet, which reflected the total number of digital circuits for each co-location. A 20 circuit average per digital (DS1) circuit was used to calculate a total circuit count, i.e. by multiplying 20 x <DS1 circuit count>, which was then added to the Analog Loop count in column E (2. Number of Lines Including Via Special Access).

In the 'Qwest info to certify 7-28-03' spreadsheet, column 'N', 'DS1 Loop Sum' was added to reflect Integra's Digital Loop count

- A description of all criteria regarding analog and digital services that you applied when revising the data you supplied in response to Order No. 6.

The correct way for revising the CLEC+DATA+REQUEST spreadsheet, would have been to multiply the Digital Circuit count contained in inserted column 'F' by 20 (circuit average), with the result being subtracted from the Analog loop count located in column E (2. Number of Lines Including Via Special Access). What did happen though, was that the Digital Circuit count contained in inserted into column 'F' was subtracted from the Analog loop count located in column E, resulting in a inflated DS0 (analog) calculation.

The adjustment to the 'Qwest info to certify 9-30-03' spreadsheet was achieved by subtracting the DS1 (digital) Loop Sum, located in column N, from the DS0 (Analog) Loop Sum contained in column M. The count contained in column N (DS1 Loop Sum) was changed to zero.

Integra is in the process of reviewing its responses again and reserves the right to file Supplemental Responses in the event needed.

Respectfully submitted

INTEGRA TELECOM OF WASHINGTON, INC.

By: \_\_\_\_\_  
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