

**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)	
)	COMMENTS OF INTEGRA
For Commission Approval of 2013)	
Additions to its Non-Impaired Wire Center)	
List)	
.....)	

Integra Telecom of Washington, Inc., on behalf of itself and its affiliates¹ (“Integra”), respectfully provides these comments to Qwest Corporation dba: CenturyLink QC’s (“CenturyLink”), December 13, 2013 Petition for Commission Approval of 2013 Additions to Non-Impaired Wire Center List in accordance with the FCC’s Triennial Review and Remand Order.

Background

On December 13, 2013, CenturyLink filed a petition for Commission Approval of 2013 Additions to the Non-Impair Wire Center List (“2013 Petition”). CenturyLink’s 2013 Petition requested the approval for the reclassification of CenturyLink QC’s Yakima Chestnut wire center to Tier 2 classification on the Washington non-impaired wire center list. CenturyLink based the requested tier reclassification on the number of fiber-based collocations in the wire center. CenturyLink filed highly confidential data in support of its petition on January 6, 2014. Integra completed an audit of the highly confidential data provided by CenturyLink.

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.

As a result of the information provided by CenturyLink and the results of Integra's audit, Integra does not object to the classification of the Yakima Chestnut as Tier 2.

Discussion

A change in a wire center's non-impairment classification, as requested by CenturyLink, permanently², affects the availability of unbundled network elements such as dark fiber transport, unbundled DS3 transport and unbundled DS1 transport. As a result, the Commission should be cautious when changing a wire center Tier designation and be certain that the facts support a change in the designation.

Dark fiber transport and DS3 transport are not available as unbundled network elements ("UNEs") between a Tier 2 wire center and another wire center classified as either Tier 1 or Tier 2. Unbundled DS1 transport is not available between two Tier 1 wire centers and is limited to a cap of 10 transport circuits between a Tier 2 wire center and another wire center classified as Tier 1 or Tier 2.

The classification of a Tier 1 or Tier 2 wire center may be based upon line counts or fiber-based collocations. In CenturyLink's 2013 Petition, they based the change in Tier status upon the number of fiber-based collocators. A Tier 2 Classification requires at least three fiber-based collocators. The FCC defines a fiber-based collocator as:

A fiber-based collocator is any carrier, unaffiliated with the incumbent LEC, that maintains a collocation arrangement in an incumbent LEC wire center, with active electrical power supply, and operates a fiber optic cable or comparable transmission facility that (1) terminates at a collocation arrangement within the wire center; (2) leaves the incumbent LEC wire center premises; and (3) is owned by a party other than the incumbent LEC or any affiliate of the incumbent LEC except as set forth in this paragraph. Dark fiber obtained from an incumbent LEC on an indefeasible right of use basis shall be treated as non-incumbent LEC fiber-optic cable. Two or more affiliated fiber-based collocators in a single wire center shall collectively be counted as a single fiber-based collocator. For purposes of

² 47 C.F.R § 51.319 (3)(i) "...Once a wire center is determined to be a Tier 1 wire center, that wire center is not subject to later reclassification as a Tier 2 or Tier 3 wire center"

this paragraph, the term affiliate is defined by 47 U.S.C. § 153(1) and any relevant interpretation in this Title.³

The impact and permanency of changes in wire center classifications led Integra to undertake an evaluation of the highly confidential data CenturyLink provided in this docket. Integra contacted the carriers listed as fiber-based collocators in the wire center under review to confirm CenturyLink's declarations.

Conclusion

Integra completed its evaluation to verify CenturyLink's count of the fiber-based collocators in the Yakima Chestnut wire center. Based on this evaluation, Integra does not object to CenturyLink's application to classify the Yakima Chestnut wire center, as listed below, effective upon the Commission's order:

STATE	WIRE CENTER	CLLI8	TIER	NO IMPAIRMENT FOR
WA	Yakima Chestnut	YAKMWA02	Tier 2	DS3 Transport & DF

RESPECTFULLY SUBMITTED,



Dated: February 14, 2014..

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³ 47 C.F.R. § 51.5