

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION  
COMMISSION

In the Matter of the Petition of

QWEST CORPORATION

For Competitive Classification of  
Basic Business Exchange  
Telecommunications Services

DOCKET NO. UT-030614

RESPONSE OF INTEGRA  
TELECOM OF WASHINGTON,  
INC. TO COMMISSION STAFF  
MOTION REQUESTING THE  
COMMISSION ORDER CLECS TO  
PRODUCE INFORMATION

I. INTRODUCTION

On May 1, 2003, Qwest Corporation filed a petition for competitive classification of its basic business exchange services in Washington pursuant to RCW 80.36.330. On June 6, 2003 at the pre-hearing conference the parties discussed discovery and the protection of such information. A Standard Protective Order was approved. on June 12, 2003, Commission Staff filed a Motion requesting that the Washington Utilities and Transportation Commission (Commission) order Competitive Local Exchange Carriers (CLECs) to produce information the Commission Staff requires to determine whether Qwest's basic business services are competitive in Washington, in response to the three following questions:

1. If your company offers basic business telecommunications, PBX, or centrex service in less than the entire state of Washington, please describe the

geographic area in which your company offers such service, or plans to offer such service in the state of Washington within the coming 12 months.

2. For each Qwest wire center in Washington and for each type of telecommunications service that your company provides to business customers (basic business exchange telecommunications, PBX, centrex service) please provide the number of lines your company provided to business customers as of December 31, 2002. Please provide separate totals for those lines provided through (a) resale of Qwest service, (b) unbundled network element loops, (c) combinations of network elements such as UNE-P, and (d) facilities owned by your company.

3. For each Qwest wire center in Washington and for each type of telecommunications service that your company provides to business customers (basic business exchange telecommunications, PBX, centrex service) provide the total number of business customer locations your company served as of December 31, 2002. Please provide separate totals for those locations served through (a) resale of Qwest service, (b) unbundled network element loops, (c) combinations of network elements such as UNE-P, and (d) facilities owned by your company.

Integra Telecom of Washington, Inc. (Integra) submits the following response.

## II. DISCUSSION

Integra agrees that the Commission and Staff will require information to determine whether the services that Qwest seeks to declassify are subject to “effective competition”, and that pursuant to RCW 80.36.330(5), the Commission may request telecommunications companies to supply data to determine whether competitive classification is warranted. However, Integra submits that the request is extremely broad and will be burdensome for Integra. The request, potentially encompasses information that the Commission may already have from Qwest.

This petition is Qwest’s request and should be Qwest’s burden to prove. In its response, Qwest indicates that it has delivered significant information in support of the petition. Integra has one switch in the State of Washington and few other owned

facilities. Integra obtains its underlying loops primarily from Qwest, so Qwest has access to much of the information requested in the three questions. To the extent that the Commission already has the information from Qwest, Integra would ask not to duplicate the effort.

Further, Integra is a privately-held company and the information requested is highly sensitive and extremely confidential. It includes trade secrets relating to Integra services, customers, locations, and, in general, the operation of Integra's business and plans in the State of Washington. Disclosure of this information to the parties in the case may be extremely detrimental to Integra and put Integra at a competitive disadvantage. To the extent that the Staff's Motion is granted, Integra will file an appropriate Motion to Request an Extraordinary Protective Order limiting disclosure of the information to only designated members of the Commission Staff and no others.

Respectfully submitted, this 17th day of June, 2003.

Integra Telecom of Washington, Inc.

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## CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing Petition to Intervene on the following parties:

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I further certify that said copies were served by facsimile to the numbers so designated and by placing them in sealed envelopes addressed to said party's/attorneys' last known addresses as shown and deposited in the United States Mail at Beaverton, Oregon, and that the postage thereon was prepaid.

DATED this 17th day of June, 2003.

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