

EXHIBIT B

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

INTEGRA TELECOM OF WASHINGTON,
INC.,
a Washington corporation,

Complainant,

v.

VERIZON NORTHWEST, INC.,

Respondent

DOCKET NO. _____

COMPLAINANT'S FIRST SET OF DATA
REQUESTS TO RESPONDENT

10 **TO:** Verizon Northwest, Inc. ("Verizon) and its attorney of record, Gregory M. Romano, 1515
11 North Courthouse Road, Suite 500, Arlington, VA 22201.

12 Pursuant to WAC 480-07-405, Complainant requests that Respondent provide responses
13 to the following data requests within ten (10) business days after receipt of these requests.

14 Please send responses to the undersigned at the offices of Integra Telecom of Washington, Inc.
15 ("Integra"), 1201 N.E. Lloyd Blvd., Suite 500, Portland, OR 97232. Contact the undersigned
16 before the response due date noted above if the request is unclear or if you need more time. If
17 you need more time to respond to part of the request but can otherwise respond timely, please
18 provide a partial response by the due date.

19 1. Please identify all persons by full name, job title, and location who participated in
20 providing responses to these data requests and for which responses each person provided
21 information.

22 2. Please produce all documents reflecting communication between Verizon and
23 Integra regarding the Boys & Girls Club of Kirkland, Liposonix, Washington Academy of
24 Performing Arts, Applied SBC, Quzar, Woodinville Weekly, Powercom, and Springstar LLC,
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1 COMPLAINANT'S FIRST SET OF DATA REQUESTS

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Integra Telecom of Washington, Inc.
1201 NE Lloyd Blvd., Ste. 500
Portland, OR 97232
Phone: (503) 453-8000
Fax: (503) 453-8221

1 including but not limited to correspondence, electronic mail, notes, memoranda, trouble tickets,
2 and orders.

3 3. Please produce all documents reflecting communication between Verizon and any
4 other person, company, or entity regarding the Boys & Girls Club of Kirkland, Liposonix,
5 Washington Academy of Performing Arts, Applied SBC, Quzar, Woodinville Weekly,
6 Powercom, and Springstar LLC, including but not limited to any communication regarding
7 channel bank cards.

8 4. Please produce all documents that refer or relate to the disconnect problem
9 experienced by the customers listed in Integra's Complaint in this docket, *i.e.*, the telephones
10 would not hang up.

11 5. Please produce all documents that refer or relate to the use of channel bank cards
12 to allegedly cure the disconnect problem experienced by the customers listed in Integra's
13 Complaint.

14 6. Please identify any other instance in which another carrier ordered DS0 loops
15 from Verizon, Verizon provided those loops through a channel bank, and the customer
16 experienced the disconnect problem described in Integra's Complaint, *i.e.*, the telephones would
17 not hang up. "Identify" includes providing the names of the carrier and the customer and the
18 date of the service order.

19 7. Please explain why, according to Verizon, Integra must provide service to the
20 Boys & Girls Club of Kirkland, Liposonix, Washington Academy of Performing Arts, Applied
21 SBC, Quzar, Woodinville Weekly, Powercom, and Springstar LLC through a channel bank
22 instead of direct copper facilities.
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2 COMPLAINTANT'S FIRST SET OF DATA REQUESTS

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1 8. Please explain why Verizon can provide service to the Washington Academy of
2 Performing Arts, Applied SBC, Quzar, and Powercom without the customers experiencing the
3 disconnect problem described in Integra's Complaint in this docket, *i.e.*, the telephones would
4 not hang up.

5 9. Please admit the following:

6 a) The DS0 loops ordered by Integra described in paragraphs 8 and 19 of
7 Integra's Complaint in this docket are unbundled network elements that Integra is entitled
8 to order and obtain at UNE rates through its interconnection agreement with Verizon.

9 b) Verizon currently provides service to the Washington Academy of
10 Performing Arts, Applied SBC, Quzar, and Powercom.

11 c) Verizon currently provides service to the Washington Academy of
12 Performing Arts, Applied SBC, Quzar, and Powercom without the disconnect problem
13 experienced by those customers described in Integra's Complaint in this docket.

14 d) Verizon has provisioned and billed to Integra a combination of resale and
15 UNE loop services at the locations for the Boys & Girls Club of Kirkland and
16 Woodinville Weekly.

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18 10. To the extent Verizon's responses to Request No. 9 herein are anything but
19 unqualified "admit," please provide the following information for each denial:

20 a) identify and describe the factual and legal basis for the denial or qualified
21 denial;

22 b) identify all persons with knowledge of the factual basis, or who provided
23 facts used in the denial or qualified denial;
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3 COMPLAINTANT'S FIRST SET OF DATA REQUESTS

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1 c) identify and describe all documents relied upon in making the denial or
2 qualified denial.

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4 Dated this 14 day of June, 2005.

5 Respectfully submitted,

6 INTEGRA TELECOM OF OREGON, INC.

7
8 By: 

9 Gregory G. Scott
10 Karen J. Johnson, OSB No. 94349
11 John P. (Jay) Nusbaum, OSB No. 96378
12 1201 NE Lloyd Blvd., Suite 500
13 Portland, Oregon 97232
14 Direct Dial: 503-453-8054
15 Fax: 503-453-8221
16 Email: jay.nusbaum@integratelecom.com

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4 COMPLAINANT'S FIRST SET OF DATA REQUESTS

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CERTIFICATE OF SERVICE

I hereby certify that I have this day served this document upon all parties of record in this proceeding by the following method(s):

- In person;
- By mail, properly addressed with first class postage prepaid;
- By delivering to a commercial parcel delivery company and making or arranging payment of the pertinent fee;
- By telefacsimile transmission, if other forms of service are waived;
- By electronic mail, if other forms of service are waived.

DATED at Portland, OR this 14th day of June, 2005.

INTEGRA TELECOM OF WASHINGTON, INC.

By: 

John (Jay) P. Nusbaum, OSB No. 96378
Associate Regulatory Attorney
Integra Telecom
1201 NE Lloyd Blvd., Ste. 500
Portland, OR 97232
(503) 453-8054
jay.nusbaum@integratelecom.com