

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

In the Matter of the Joint Application of  
  
VERIZON COMMUNICATIONS, INC., AND  
MCI, INC.  
  
For Approval of Agreement and Plan of Merger

DOCKET NO. UT-050814  
  
INTEGRA TELECOM'S RESPONSE TO  
JOINT MOTION FOR EXTENSION OF  
TIME TO FILE TESTIMONY

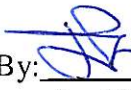
1. Intervenor Integra Telecom of Washington, Inc. ("Integra") joins in Staff's and Public Counsel's Joint Motion for Extension of Time to File Testimony. In its ruling on Integra's Motion to Compel, the Commission stated that it would extend the schedule if necessary to allow Integra an opportunity to meaningfully participate in this docket: "The Commission is prepared to extend the schedule in the docket as may be appropriately and reasonably necessary to allow Integra to pursue the data it already sought, plus any follow-up information it may appropriately and reasonably require prior to completing its testimony." Order Granting, In Part, Motion to Compel at 7. The Commission urged Verizon to cooperate with Integra to minimize or eliminate any delay. *Id.*

2. Despite a meeting and Integra's follow up email, Integra and Verizon have not reached agreement on discovery and the schedule. Integra received part of Verizon's responses to its discovery requests on Friday, August 12, and Verizon apparently sent some responses after the close of business that day. Integra has not had a chance to thoroughly review those responses and issue additional discovery, and it appears that Verizon has not responded to all the requests addressed by the Commission's order on Integra's Motion to Compel.

3. Given that: (1) the deadline for filing testimony is this Friday, August 19; (2) Verizon and Integra have not reached agreement on extending the schedule despite additional discovery responses owed by Verizon and follow up discovery to be pursued by Integra; (3) Staff and Public Counsel apparently were unable to reach agreement with Verizon regarding their discovery dispute; and (4) Staff and Public Counsel request an extension of time, Integra joins with Staff and Public Counsel's Motion to Extend and asks that all extensions apply equally to all parties.<sup>1</sup>

Dated this 15<sup>th</sup> day of August, 2005.

INTEGRA TELECOM

By:  \_\_\_\_\_  
Jay Nusbaum

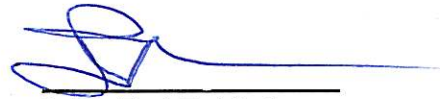
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<sup>1</sup> A two week extension for opening testimony assumes that Verizon will fully cooperate with pending and future discovery requests that relate to opening testimony. Integra reserves its right to seek any necessary additional extensions of time if further discovery disputes arise.

## CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon the persons and entities listed on the Service List below by depositing a copy of said document in the United States mail, addressed as shown on said Service List, with first class postage prepaid.

DATED at Portland, Oregon this 15<sup>th</sup> day of August, 2005.



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