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

8 **JOINT PETITION OF MASHELL
9 TELECOM, INC. D/B/A RAINIER
10 CONNECT AND CENTURYTEL OF
11 WASHINGTON, INC. D/B/A
CENTURYLINK FOR ADJUSTMENT OF
EXCHANGE BOUNDARIES**

**DOCKET NO.
JOINT PETITION TO ADJUST EXCHANGE
BOUNDARIES (EXPEDITED TREATMENT
REQUESTED)**

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14 1. THIS JOINT PETITION is filed by and on behalf of Mashell Telecom, Inc. d/b/a Rainier
15 Connect ("Rainier Connect") and CenturyTel of Washington, Inc. d/b/a CenturyLink
16 ("CenturyLink") to modify the boundaries of Rainier Connect's Eatonville Exchange and
17 CenturyLink's Ashford Exchange.

18 **BASIS FOR PETITION**

19 2. The Federal Communications Commission has promulgated a requirement for carriers to
20 submit electronic maps of carrier study areas.¹ As a part of that process, the Washington Utilities
21 and Transportation Commission ("Commission") undertook to develop and submit the electronic
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24 ¹ *Connect America Fund; High-Cost Universal Service Support*, WC Docket Nos. 10-90, 05-337, Report
25 and Order, 27 FCC Rcd 13528 (Wireline Comp. Bur. 2012); Order of Reconsideration, 28 FCC Rcd 1389,
(Wireline Comp. Bur. 2013).

26 **JOINT PETITION TO ADJUST EXCHANGE
BOUNDARIES - 1**

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1 maps on behalf of many of the carriers. Under the FCC's published timeline, this means that the
2 study area maps were due to the FCC by June 28, 2013.²
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4 3. The Commission developed study-area maps and submitted the maps to the affected
5 companies for review. In reviewing the information developed by the Commission, Rainier
6 Connect realized that it was serving customers that were physically in CenturyLink's Ashford
7 Exchange.
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9 4. Based on Rainier Connect's records, it appeared that that service to these customers
10 (fourteen in total) has existed from at least the mid 1990s. While records do not exist as to why
11 the service was undertaken, it is safe to assume that because of the terrain and location of these
12 customers, CenturyLink was unable to extend service on a cost effective basis at the time and it
13 was more cost effective for Rainier Connect to extend service.
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15 5. A revised exchange map for Rainier Connect's Eatonville Exchange is attached as Exhibit

16 1. A revised map of the Ashford Exchange to be serviced by CenturyLink is attached as Exhibit

17 2.

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19 6. A legal description for the territory to be added to the Eatonville Exchange is attached as
20 Exhibit 3. A revised legal description for the Ashford Exchange is attached as Exhibit 4.
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² Wireline Competition Bureau Announces Procedures and Deadlines for Submission of Study Area Boundaries, WC Docket Nos. 10-90, 05-337, Public Notice, DA 13-456 (Wireline Comp. Bur. rel. March 18, 2013).

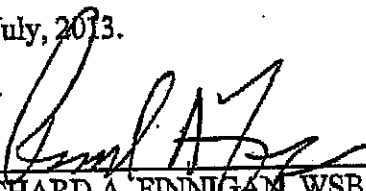
ACTION REQUESTED

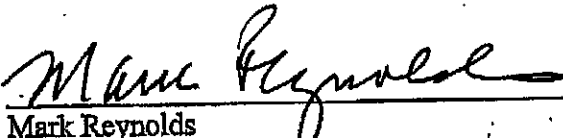
7. Pursuant to RCW 80.36.230, the Commission has the authority to establish each carriers exchange boundaries.

8. Rainier Connect and CenturyLink request that the Commission approve this Petition and adjust the exchange boundaries of the Eatonville and Ashford exchanges accordingly.

9. Because of the filing deadlines, Rainier Connect requests expedited treatment of the Petition on or before July 27, 2013. CenturyLink has no objection to the boundary line revision for the Ashford Exchange or for the request for expedited treatment.

Respectfully submitted this 11th day of July, 2013.


RICHARD A. FINNIGAN, WSB #6443
Attorney for Mashell Telecom, Inc. d/b/a Rainier Connect


Mark Reynolds
Vice-President NW Region Legislative & Regulatory
Affairs for CenturyTel of Washington, Inc.
d/b/a CenturyLink