

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of the Petition of)	DOCKET NO. UT-130477
)	
THE CENTURYLINK COMPANIES –)	
QWEST CORPORATION; CENTURYTEL)	
OF WASHINGTON; CENTURYTEL OF)	PETITION TO INTERVENE OF
INTERISLAND; CENTURYTEL OF)	INTEGRA
COWICHE; AND UNITED TELEPHONE)	
COMPANY OF THE NORTHWEST)	
)	
To be Regulated Under an Alternative Form)	
of Regulation Pursuant to RCW 80.36.135.)	
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Pursuant to WAC 480-07-355, Integra Telecom of Washington, Inc., on behalf of itself and its affiliates¹ (“Integra”), hereby petitions the Commission for leave to intervene for the limited purpose described below in the above-entitled docket. As grounds for intervention, Integra states as follows:

The name, address, and telephone number of the persons to whom communications should be addressed is:

Douglas Denney
Vice President, Costs & Policy
Integra Telecom
1201 NE Lloyd Blvd., Suite 500
Portland, OR 97232
dkdenney@integratelecom.com
Direct: 503-453-8285
Fax: 503-453-8223

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.

Integra is a registered and competitively classified telecommunications company authorized to provide both intraexchange and interexchange telecommunications services throughout Washington. Integra currently competes with CenturyLink primarily in the legacy Qwest service territory.

Integra has an interest in this case. Integra uses its own facilities along with facilities leased from CenturyLink in order to provide service to business customers in the CenturyLink service territory. Because Integra leases, in part, facilities from CenturyLink in order to provide service, Integra's ability to compete is dependent upon the prices, terms, conditions, and service quality provided by CenturyLink to Integra. CenturyLink's performance in this regard affects Integra's ability to make functionally equivalent or substitute services readily available at competitive rates, terms, and conditions. CenturyLink's petition lays out a number of proposals regarding how Commission oversight of CenturyLink's wholesale obligations will function during the term of the AFOR. Integra seeks to participate in this proceeding for the limited purpose of assuring that changes, if any, in Commission oversight of CenturyLink wholesale services in Washington, including Commission oversight of Transfers of Property will not adversely impact Integra's ability to compete in Washington. In addition, Integra may be interested in any additional issues raised during the course of the case that were not described in CenturyLink's petition.

The evidence, if any, and briefing presented by Integra will be of material value to the Commission in its determination of the issues involved in this proceeding, and Integra's intervention will not broaden those issues or delay the proceedings.

WHEREFORE, Integra prays for leave to intervene as a party to this proceeding, with a right to discovery, to have notice of and appear at the taking of testimony, to produce and

cross-examine witnesses, and to be heard in person or by counsel on brief and at oral argument.

RESPECTFULLY SUBMITTED,

A handwritten signature in black ink, appearing to read "Douglas Denney". The signature is fluid and cursive, with a prominent loop at the end.

Dated: April 26, 2013.

Douglas Denney
Vice President, Costs & Policy
Integra Telecom
1201 NE Lloyd Blvd., Suite 500
Portland, OR 97232
dkdenney@integratelecom.com
Direct: 503-453-8285
Fax: 503-453-8223