

Douglas K. Denney
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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of Qwest Corporation d/b/a)	Docket No. 13-049-18
CenturyLink QC's Petition for Commission)	
Approval of 2013 Additions to its Non-)	INTEGRA TELECOM OF UTAH's
Impaired Wire Center List and Motion for)	PETITION TO INTERVENE
Expedited Issuance of Protective Order)	

Pursuant to Utah Code Ann. § 63G-4-207 and Utah Admin. Code § R746-100-7, Integra Telecom of Utah, Inc., Electric Lightwave, LLC, and Eschelon Telecom of Utah, Inc. (collectively "Integra") hereby moves for leave to intervene in the above-referenced proceeding before the Public Service Commission of Utah. In support of this Petition, Integra states as follows:

1. Integra will be impacted since this proceeding impacts the availability of certain unbundled network elements. Integra relies, in part, upon unbundled network elements in order to provide service to end user customers in Utah.

2. The names, addresses, and telephone numbers of the persons to whom communications should be addressed are:

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Kimberly D. Isaacs
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Integra
6160 Golden Hills Drive
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Direct: 763-745-8463
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3. Integra is a certificated telecommunications company authorized to provide both intraexchange and interexchange telecommunications services in the service territories of Qwest Corporation dba CenturyLink (“CenturyLink”) in Utah. Integra currently competes with, and obtains interconnection and related services and facilities from, CenturyLink in the provision of Integra’s telecommunications services.

4. Integra has a substantial interest in this docket since this proceeding impacts the availability of certain unbundled network elements. Integra relies, in part, upon unbundled network elements in order to provide service to end user customers in Utah. Integra’s participation in this docket will facilitate review of the data provided by CenturyLink as Integra has expertise in this matter and has participated in numerous Triennial Review Remand Order dockets reviewing the Tier classification of wire centers across the CenturyLink territory. Integra seeks to participate in this proceeding in order to review the data provided by CenturyLink to ensure that wire centers are properly classified based upon the standards set by the FCC.

5. 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.

6. The following persons should be included on the service list in these proceedings, and all communications concerning this matter should be addressed to:

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WHEREFORE, for the reasons set forth above, Integra requests that the Public Service Commission of Utah grant this timely Petition to Intervene and permit Integra to participate in this proceeding with full rights as a party.

Dated this 6th day of September, 2013.

Integra Telecom of Utah

A handwritten signature in black ink, appearing to read "Douglas K. Denney". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

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CERTIFICATE OF SERVICE

I hereby certify that on the 6th day of September, 2013, an original, five (5) true and correct copies, and an electronic copy of the foregoing INTEGRA TELECOM OF UTAH's PETITION TO INTERVENE were sent to:

Gary Widerburg
Commission Administrator
Utah Public Service Commission
Heber M. Wells Building, 4th Floor
160 East 300 South
Salt Lake City, UT 84111
psc@utah.gov

and a true and correct copy, was delivered by email and U.S. Mail to:

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/s/ Kim K. Wagner
Kim K. Wagner