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UTAH PUBLIC SERVICE COMMISSION

October 7, 2013

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Via UPS Overnight Delivery

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

Re: In the Matter of a Formal Complaint of Pignatelli & O'Brien, LLC, against Integra Telecom of Utah
Docket No. 13-057-06-2299-01

Dear Mr. Widerburg:

Enclosed are the original and five copies of Exhibit 7 to Integra Telecom of Utah's Response to the Formal Complaint of Pignatelli & O'Brien, LLC in the above-referenced docket. Please substitute this Exhibit 7 for the one previously filed on October 4, 2013.

Sincerely,

A handwritten signature in black ink that reads "Kim K. Wagner".

Kim K. Wagner
Legal & Regulatory Administrator
Integra Telecom
763-745-8468 (direct)
763-745-8459 (department fax)
Kim.Wagner@integratelecom.com

Enclosures

cc: Christina Pignatelli (US Mail)
Melissa O'Brien (US Mail)

shows a pattern of abuse. Integra's fraud alert system is robust, and well within the performance standard of the telecommunications industry.

6. In this case, the call triggering volume occurred at just after 8:00 AM, whereupon the system sent a "fraud alert." A trouble ticket was issued at 8:20 AM. After the completion of certain manual processes, rendered more complicated than usual by the multiple Business Telephone Numbers and the volume of customer circuits involved, all relevant international calls were blocked by 10:25 AM. A few illegitimate calls continued to come through the switch after Integra put its block on, probably because the calls had not been terminated until then and would therefore not have been tracked by the switch.

7. Upon receiving its system alert regarding possible toll fraud activity, Integra acted promptly and appropriately to block further calls. From its position as network provider, Integra acted as quickly as possible to address the problem associated with illegal activity directed against the customer's server. Integra had discovered and blocked the customer's outgoing fraudulent calls twenty minutes before Level 3, the underlying carrier, issued its first toll fraud "carrier alert" at 10:45 AM. Integra's prompt actions likely saved significant further damage from the criminal activity.

8. Integra is responsible for carrying the communications service to and from the customer premises. The customer is responsible for installing and maintaining hardware that will interface with the communications service and ensure that calls are legitimate. Unless Integra is the customer's hardware vendor--which is not the case with P&O--the vendor, not Integra, is able to install, set, inspect, and monitor the customer's PBX. Among many things the vendor or telecommunications consultant can do to protect the customer's system are: run periodic security audits to check for loopholes in the PBX; tailor access to the PBX to conform

to business needs; delete/change all default passwords; frequently change default codes/passwords on voice mailboxes; and program the PBX to terminate access after the third invalid attempt. As the service provider, Integra has no access to the customer's PBX and can do none of these things.

I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true.

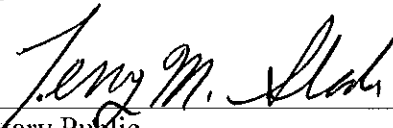
FURTHER AFFIANT SAYETH NOT.

Dated this 4 day of October, 2013.



Mitch Nodland

Subscribed and sworn before me this
4 day of October, 2013.



Notary Public

My Commission expires: 4/1/14

