Douglas K. Denney Vice President, Costs & Policy Integra 18110 SE 34<sup>th</sup> Street Building One, Suite 100 Vancouver, WA 98683

Direct: 360-558-4318

Email: <u>dkdenney@integratelecom.com</u>

## BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of Qwest Corporation d/b/a CenturyLink QC's Petition for Commission	) Docket No. 15-049-10
Approval of 2015 Additions to its Non- Impaired Wire Center	) INTEGRA TELECOM OF UTAH's PETITION TO INTERVENE
•	) )

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:

Douglas K. Denney Vice President, Costs & Policy Integra 18110 SE 34<sup>th</sup> Street Building One, Suite 100 Vancouver, WA 98683

Direct: 360-558-4318

Email: <u>dkdenney@integratelecom.com</u>

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.

3.

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:

Douglas K. Denney

Vice President, Costs & Policy

Integra

18110 SE 34<sup>th</sup> Street

Building One, Suite 100

Vancouver, WA 98683

Direct: 360-558-4318

Email: dkdenney@integratelecom.com

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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 26<sup>th</sup> day of June, 2015.

Integra Telecom of Utah

Douglas K. Denney

Vice President, Costs & Policy

Integra

18110 SE 34<sup>th</sup> Street

Building One, Suite 100

Vancouver, WA 98683

Direct: 360-558-4318

Email: dkdenney@integratelecom.com

## CERTIFICATE OF SERVICE

I hereby certify that on the 26th day of June, 2015, an original, plus one (1) true and correct copy, 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, 4<sup>th</sup> 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:

Torry R. Somers Associate General Counsel 6700 Via Austi Pkwy. Las Vegas, NV 89119 Ph: (702) 244-8100

Fax: (702) 244-7775

torry.r.somers@centurylink.com

Kim K. Wagner