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May 24, 2018

VIA EMAIL & FEDERAL EXPRESS

Ms. Julie Orchard
Utah Public Service Commission
Heber M. Wells Bldg., 4th Floor
160 East 300 South
Salt Lake City, UT 84111

Re: Docket No. 08-049-29

Dear Ms. Orchard:

Pursuant to the Commission's Order on Request for Review and Staying August 11, 2008, Report and Order Approving Tier 2 Designation of Qwest's Draper Wire Center (issued August 18, 2008) in the above-referenced docket ("Order on Request for Review"), Integra Telecom of Utah, Inc. ("Integra") and XO Communications Services, Inc. ("XO") hereby notify the Commission that they have completed their review of the line count data for the Draper Wire Center and no longer object to its designation at a Tier 2 Wire Center.

Integra worked cooperatively with Qwest following entry of the Order on Request for Review, and based on additional and corrected information that Qwest provided, Integra was able to determine that the line count discrepancies that still exist are not systematic errors and do not affect the designation of the Draper Wire Center as a Tier 2 Wire Center. Integra and XO accordingly now do not object to that designation. Contrary to Qwest's position, however, Integra and XO propose that the Tier 2 designation of the Draper Wire Center be effective the date of the Commission order lifting the stay of the August 11, 2008, Report and Order.

The Integra and XO proposal is consistent with the Commission's decision in Docket No. 07-049-30, the prior wire center designation proceeding. As the Commission concluded in that docket, the parties other than Qwest "did not agree, and were not in a position to agree, to the proposed non-impairment designation until [their additional] investigation was complete. Only then was the matter submitted to the Commission for approval. Therefore, it is appropriate that

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the resulting non-impairment designation approved by this Report and Order should be effective only upon issuance of this Report and Order.” Report and Order Approving Tier 2 Designation of Qwest’s Orem Main Wire Center at 10-11 (Nov. 20, 2007).

Integra and XO appreciate the Commission’s action to provide them with sufficient time to obtain and review the line count data for the Draper Wire Center. Please contact me if you need any further information from Integra or XO on this issue.

Very truly yours,

Davis Wright Tremaine LLP

Gregory J. Kopta

cc: Service List