



November 8, 2004

VIA OVERNIGHT DELIVERY

Cheryl Walker
Administrative Specialist
Administrative Hearings Division
Oregon Public Utility Commission
550 Capitol NE, Suite 215
PO Box 2148
Salem OR 97308-2148

Re: Integra Telecom of Oregon, Inc. vs. Verizon Northwest, Inc.
Complaint file 11/5/04, Executive Summary

Dear Ms. Walker:

Enclosed for filing are an original and five copies of the Executive Summary to accompany the Complaint filed on Friday, November 5, 2004 by Integra Telecom of Oregon, Inc. against Verizon Northwest, Inc. I appreciate your call this morning.

Also enclosed please find a disk with an electronic version of the complaint and affidavit. I have included electronic copies of the exhibits to the best of my ability, but I do not have an electronic copy of the Interconnection Agreement (Exhibit B-1 and B-2) or the photographs (Exhibit G).

Please return a filed stamped copy to me in the enclosed stamped, self-addressed envelope.

Thank you,

Karen J. Johnson
Corporate Regulatory Attorney

KJJ

Enclosures

cc Renee Willer, Verizon Northwest via overnight delivery

1 Gregory Scott
2 Karen J. Johnson, OSB# 94349
3 Integra Telecom of Oregon, Inc.
4 1201 NE Lloyd Blvd., Suite 500
5 Portland, Oregon 97232
6 (503) 453-8119
7 FAX (503) 453-8221
8 karen.johnson@integratelecom.com

9 **BEFORE THE OREGON PUBLIC UTILITY COMMISSION**

10	INTEGRA TELECOM OF OREGON, INC.,)	
11	an Oregon Corporation)	Docket No. _____
12)	
13	Complainant)	Complaint for Violation of
14	vs.)	ORS 759.455 and
15)	Interconnection Agreement
16	VERIZON NORTHWEST, INC.)	
17	Defendant)	

18 **EXECUTIVE SUMMARY**

19 Integra Telecom of Oregon, Inc. (“Integra”) submits the following Executive Summary
20 outlining the issues and requested relief set forth in the above-entitled complaint against Verizon
21 Northwest:

22 **ISSUES**

- 23 1. Whether Verizon has an obligation to deliver dark fiber loops and necessary cross
24 connects to Integra pursuant its order submitted and resubmitted since June 2004.
- 25 2. Whether Integra submitted an order for two strands of dark fiber to an end user
location at 9100 SW Gemini, Beaverton, Oregon.
3. Whether Verizon wrongfully rejected the order for two strands of dark fiber.
4. Whether Verizon has unreasonably delayed in its acceptance and completion of
the order for two strands of dark fiber.

EXECUTIVE SUMMARY

1 5. Whether Verizon is unreasonably discriminating against Integra by refusing to
2 accept and complete the order.

3 6. Whether Verizon has violated ORS 759.455 by refusing to accept and complete
4 Integra's order for two strands of dark fiber to 9100 SW Gemini, Beaverton, Oregon.

5 7. Whether Verizon has violated the terms of the 251/252 Agreement approved by
6 this Commission November 2000, specifically section 2.1.8 and the First Amendment, by
7 refusing to accept and complete Integra's order for two strands of dark fiber to 9100 SW Gemini,
8 Beaverton, Oregon.

9 **SUMMARY OF FACTS**

10 In November 2000, the Commission approved an interconnection agreement between
11 Integra and Verizon allowing Integra to buy certain services from Verizon, including dark fiber.
12 The parties amended the Agreement in June 2001.

13 In June 2004, one of Integra's end user customers ordered Ethernet transport from
14 Integra. Integra placed an order for two strands of dark fiber with Verizon in order to provide
15 the services to Integra's end user customer. Verizon rejected Integra's order, saying that there
16 were no facilities available. Integra met with its customer and advised that it would not be able
17 to fulfill the contract as there were no underlying facilities available. The customer was
18 surprised. Integra did a site visit and discovered more than enough facilities at the customer
19 location to complete the order, including 2 demarcation points at the location with fiber and
20 copper and, specifically, 2 strands of fiber hooked up at the customer location, but not in service.

21 Since June, Integra escalated the order pursuant to the provisions of its Interconnection
22 Agreement and through the Verizon processes, including the NMOC, our service representative,
23 and regulatory representatives. Even though underlying facilities are there and available for use,
24 to date, the order has not been fulfilled.

25
EXECUTIVE SUMMARY

1 **RELIEF REQUESTED**

2 Integra requests that the Commission find that Verizon has violated the Interconnection
3 Agreement and ORS 759.455 and order that Verizon accept and complete Integra's order for 2
4 dark fiber strands at an End User location, 9100 SW Gemini, Beaverton, Oregon.

5
6 DATED this ____ day of November, 2004

7 Respectfully submitted,

8 INTEGRA TELECOM OF OREGON, INC.

9
10 By: _____
11 Karen J. Johnson, OSB #94349
12 Corporate Regulatory Attorney
13
14
15
16
17
18
19
20
21
22
23
24
25

EXECUTIVE SUMMARY

CERTIFICATE OF SERVICE

I hereby certify that deposited a true and accurate copy of the attached Executive Summary in overnight delivery, pre-paid, at Portland, Oregon upon the following party:

Verizon Northwest, Inc.
17933 NW Evergreen Parkway
Beaverton, Oregon 97006

Dated this ____ day of November, 2004.

Karen J. Johnson, OSB #94349
Corporate Regulatory Attorney
Integra Telecom of Oregon, Inc.
1201 NE Lloyd Blvd, Suite 500
Portland, Oregon 97232
(503) 453-8119/FAX (503) 453-8221

1 Gregory Scott
2 Karen J. Johnson, OSB# 94349
3 Integra Telecom of Oregon, Inc.
4 1201 NE Lloyd Blvd., Suite 500
5 Portland, Oregon 97232
6 (503) 453-8119
7 FAX (503) 453-8221
8 karen.johnson@integratelecom.com

9 **BEFORE THE OREGON PUBLIC UTILITY COMMISSION**

10 **INTEGRA TELECOM OF OREGON, INC.,)**
11 **an Oregon Corporation)** **Docket No. _____**
12 **Complainant)**
13 **vs.)** **Complaint for Violation of**
14 **VERIZON NORTHWEST, INC.)** **ORS 759.455 and**
15 **Defendant)** **Interconnection Agreement**

16 **INTRODUCTION**

17 1. This is an action brought by INTEGRA TELECOM OF OREGON, INC., an
18 Oregon corporation (“Integra”) against VERIZON NORTHWEST, INC. (“Verizon”) for
19 discriminating against another telecommunications carrier and failing to provide access to a
20 facility, feature or function necessary for provision of telecommunications services to an end
21 user in violation of Oregon Revised Statutes, Chapter 759, Section 455 and the terms and
22 provisions of the 251/252 Agreement entered into between Integra and Verizon on August 17,
23 2000 and approved by this Commission on November 13, 2000. *Docket No. ARB 271, Order*
24 *No. 00-734.*

1 **PARTIES**

2 2. Integra is a Competitive Local Exchange Carrier with authority to provide
3 telecommunications services in the State of Oregon including Verizon exchanges. Integra’s
4 headquarters are located at 1201 NE Lloyd Blvd., Suite 500, Portland, Oregon 97232.

5 3. Verizon is a Washington corporation, with an office located at 17933 NW
6 Evergreen Parkway, Beaverton, Oregon 97006. Verizon is a telecommunications utility within
7 the meaning of ORS 759.

8 **JURISDICTION**

9 4. This Commission has jurisdiction hereof under Oregon Revised Statutes, Chapter
10 759, Section 455(1):

11 . . . a telecommunications utility shall not: . . .

12 (a) Discriminate against another provider of retail telecommunications services by
13 unreasonably refusing or delaying access to the telecommunications utility’s local
14 exchange services.

15 (d) Fail to disclose in a timely and uniform manner, upon reasonable request and
16 pursuant to a protective agreement concerning proprietary information, all information
17 reasonably necessary for the design of the network interface equipment, services or
18 software that will meet the specifications of the telecommunications utility’s local
19 exchange network.

20 (e) Unreasonably refuse or delay interconnections or provide inferior
21 interconnections to another provider of telecommunications services.

22 and Chapter 759, Section 455 (2):

23 A complaint alleging a violation of subsection (1) of this Section shall be heard by the
24 Public Utility Commission or, at the commission’s discretion, by an Administrative Law
25 Judge . . .

BACKGROUND

5. On June 29, 2004 Integra received a contract to provide certain services for an
End User Customer located at 9100 SW Gemini, Beaverton, Oregon. A copy of the relevant

1 portions of the contract are attached as Exhibit A.

2 6. On June 30, 2004, Integra placed a Transport Services Inquiry order, requesting 2
3 strands of dark fiber to 9100 SW Gemini, with Verizon for the underlying wholesale services
4 necessary to provide the services requested in the end user contract. Integra placed the order
5 under the terms and provisions of the 251/252 Agreement entered into between Integra and
6 Verizon on August 17, 2000 and approved by this Commission on November 13, 2000. *Docket*
7 *No. ARB 271, Order No. 00-734*. Relevant portions of the 251/252 Agreement are attached as
8 Exhibits B-1 and B-2.
9

10 7. Integra requested a due date of July 15, 2004 in accordance with Verizon's
11 standard interval of at least 10 business days for unbundled dark fiber (UDF) inquiries. Verizon
12 did not reject the order.

13 8. Verizon failed to issue a confirmation of the inquiry by July 15, 2004. When
14 fiber is available, Verizon puts the inquiry order in "confirmed" status.

15 9. On July 19, 2004, Integra escalated the order. Verizon advised: "dark fiber
16 inquiry was denied as do not currently exist, please send sup to cancel." See message from
17 Verizon attached hereto as Exhibit C.

18 10. Integra contacted its End User Customer to advise that Verizon claimed that no
19 underlying facilities were available. The 2 lines showing active at the location were being used
20 by Verizon.
21

22 11. On July 27, 2004, the End User Customer advised that there were physical cables
23 at its facility, 2 had been connected for services previously provided by Verizon, but that the
24 Customer had terminated its agreement with Verizon. The 2 cables were still connected at the
25 demarc in Customer's building and not being used by the Customer, Verizon or anyone else.

1 12. On July 29, 2004, Integra contacted Verizon Field Engineer Rob H. Whitford for
2 clarification on why the order was denied, sharing the information obtained from the Customer.
3 On August 3, 2004, Mr. Whitford generated the email attached as Exhibit D, acknowledging that
4 the 2 strands of fiber were not being used by Verizon and should be made available to Integra.

5 13. Integra heard nothing for one week. Integra then contacted Verizon to follow-up
6 on the status of the order. Instead of confirming the inquiry already in the system, Verizon said
7 that “the only way to verify facilities is another order as a request for inquiry.” Integra
8 resubmitted its inquiry on August 10, 2004, 40 days after the initial request
9

10 14. A full week later, on August 17, 2004, Verizon rejected the second request for the
11 2 strands of dark fiber, saying:

12 Since only two fibers enter this premise, CLEC occupation of those fibers would result in
13 zero percent remaining. Verizon is not required to grant dark fiber requests when the
result is less than 20 percent of fibers remaining available for Verizon.

14 *Electronic mail message from Shandra M. Botts of Verizon to Roxanne Richards of Integra,*
15 *dated August 17, 2004 at 8:45am.* A copy is attached as Exhibit E.

16 15. Steve Fisher, Integra’s Director of Network Engineering, visited the End User
17 Customer premise on August 20, 2004. He discovered 24 fibers at the location, 2 of which were
18 fully connected and 22 that were physically present but did not appear to be connected. See
19 Steve Fisher Affidavit attached hereto as Exhibit F.

20 16. Fisher also discovered a second demarc for the building, containing additional
21 Verizon facilities. The Customer had sub-leased a portion of the upstairs of its building to a
22 tenant in the banking business, specifically, telemarketing and credit card issuance. This demarc
23 contained 12 additional strands of fiber, and one feed of copper, both of which entered the
24 building at the second demarc, were connected to a main panel, and ran upstairs. None of the
25

1 facilities at the second demarc were currently in service. See affidavit and photographs of Steve
2 Fisher, attached as Exhibits F and G, respectively.

3 16. Upon discovery of the 22 additional strands of fiber at the first demarc, and the
4 discovery of the additional fiber and copper strands at the second demarc, Integra requested
5 further explanation from Verizon on its rejection of this order.

6 17. Verizon responded as follows:

7 Although 24 fibers are present in the entrance cable, only two are spliced through, the
8 other twenty-two are dead at the first splice point. Since splicing is not required to meet a
9 dark fiber request the calculation goes like this:

10 2 of 2 equals 100% leaving 0% available.

11 By the way, I was off on the policy, although it doesn't change the outcome. Verizon's
12 policy does not allow dark fiber to occupy more than 25% of our cable, reserving 75% for
our use.

13 *Electronic mail from Bill Wells of Verizon to Steve Fisher of Integra, dated August 24, 2004 at*
14 *7:29am.* A copy is attached as Exhibit H.

15 18. Verizon disclosed that there was copper available at the facility, but never
16 disclosed the existence of the second demarc containing fiber as well as copper, more than ample
17 facilities to fill Integra's order. See affidavit of Steve Fisher, Exhibit F.

18 19. Even in the absence of the second non-disclosed demarc, Verizon improperly
19 denied Integra's order given that the first demarc contained adequate facilities to fill the order.

20 20. Integra continued to escalate the order and on October 26, 2004, Verizon advised
21 that it would indeed splice fibers (even though no splicing is necessary as 2 fibers are already
22 connected) to complete the order provided Integra sign Verizon's proposed amendment to the
23 251/252 Agreement related to the issues raised by the Triennial Review Order and the continuing
24 litigation and Interim Rules.
25

1 **CLAIMS AND PRAYER FOR RELIEF**

2 21. Verizon’s refusal to grant Integra’s order for 2 dark fibers at an End User location
3 where 24 fibers are available at a single demarc violates Oregon Revised Statutes Chapter 759,
4 Section 455 (1) a, d, and e.;

5 22. Verizon’s failure to disclose the existence of the second demarc containing more
6 than adequate fiber and copper to fill Integra’s order violates Oregon Revised Statutes Chapter
7 759, section 455 (1), a, d, and e;

8 23. Verizon’s failure to grant Integra’s order for 2 dark fibers at an End User location
9 where a second demarc with 12 additional strands of fibers and copper available violates Oregon
10 Revised Statutes Chapter 759, Section 455 (1)a, d, and e.

11 24. Verizon’s refusal to grant Integra’s order for 2 dark fibers at an End User location
12 where 24 fibers are available at a single demarc violates the terms and provisions of the Verizon-
13 Integra 251/252 Agreement.

14 WHEREFORE, Integra requests that this Commission enter an order compelling Verizon
15 to immediately make available to Integra 2 dark fiber strands for use at Integra’s End User
16 Customer at 9100 SW Gemini, Beaverton, Oregon and take whatever further action to the
17 Commission seems appropriate.

18 DATED this ____ day of November, 2004

19 Respectfully submitted,

20 INTEGRA TELECOM OF OREGON, INC.

21 By: _____
22 Karen J. Johnson, OSB #94349
23 Corporate Regulatory Attorney
24

CERTIFICATE OF SERVICE

I hereby certify that deposited a true and accurate copy of the attached complaint in the U.S. Mail, postage pre-paid, at Portland, Oregon and that I also personally served a copy of the attached Complaint and all attachments upon the following party:

Verizon Northwest, Inc.
17933 NW Evergreen Parkway
Beaverton, Oregon 97006

Dated this ____ day of November, 2004.

Karen J. Johnson, OSB #94349
Corporate Regulatory Attorney
Integra Telecom of Oregon, Inc.
1201 NE Lloyd Blvd, Suite 500
Portland, Oregon 97232
(503) 453-8119/FAX (503) 453-8221

-----Original Message-----

From: shandra.m.botts@verizon.com [mailto:shandra.m.botts@verizon.com]

Sent: Tuesday, August 17, 2004 8:45 AM

To: Roxanne.Richards@integratelecom.com

Cc: bill.wells@verizon.com; rob.whitford@verizon.com

Subject: Integra Telecom PON RR081004UDFINQ, Verizon Order

CGC4224386127

-- Rejection

Roxanne,

Good Morning! I hope all is well for you. I have just received notification from facilities that the dark fiber requested on this inquiry has been rejected.

I have spoken with Bill Wells (bill.wells@core.verizon.com) regarding this rejection as he worked it. Per Verizon policy on dark fiber, this was the note on the order:

Since only two fibers enter this premise, CLEC occupation of those fibers would result in zero percent remaining. Verizon is not required to grant dark fiber requests when the result is less than 20 percent of fibers remaining available for Verizon.

The result is of this is a rejection of the inquiry. Bill said that either you, Roxanne, or Rob could contact him if there were any further clarification needed on this issue. I copied both Bill and Rob Whitford on this email.

I hope this email will provide additional information than what can be provided in a c/nr. Shortly, you will receive a jeopardy notice for this order to sup to cancel.

Don't hesitate to contact if you have any questions. Thank you,

Shandra Botts
Administrator~Une Team
Phone: 888 346-5705 x7175
E-mail:
shandra.m.botts@verizon.com

(Embedded image moved to file:

pic03297.gif)

1 Gregory Scott
2 Karen J. Johnson, OSB# 94349
3 Integra Telecom of Oregon, Inc.
4 1201 NE Lloyd Blvd., Suite 500
5 Portland, Oregon 97232
6 (503) 453-8119
7 FAX (503) 453-8221
8 karen.johnson@integratelecom.com

9 **BEFORE THE OREGON PUBLIC UTILITY COMMISSION**

10	INTEGRA TELECOM OF OREGON, INC.,)	
11	an Oregon Corporation)	Docket No. _____
12)	
13	Complainant)	Complaint for Violation of
14	vs.)	ORS 759.455 and
15)	Interconnection Agreement
16	VERIZON NORTHWEST, INC.)	
17)	EXHIBIT F
18	Defendant)	

19 **AFFIDAVIT OF STEVE FISHER**

20 The undersigned, after being duly sworn on oath, states:

21 1. My name is Steve Fisher. I am employed by Integra Telecom of Oregon, Inc., an
22 Oregon corporation, 1201 NE Lloyd Blvd., Suite 400, Portland, Oregon 97232 as the Director of
23 Network Engineering.

24 2. On June 29, 2004, Integra entered into a contract to provide certain services for an
25 end user customer. A true and accurate copy of the public version of the contract is attached
hereto as Exhibit A. The end user services required the provisioning of underlying services via
dark fiber from Verizon Northwest, Inc.

1 3. On June 30, 2004, Integra placed an order with Verizon for the underlying
2 services necessary for Integra to provision the order: two strands of dark fiber to 9100 SW
3 Gemini, Beaverton, Oregon. Integra placed the order under the terms and provisions of the
4 251/252 Agreement entered into between Integra and Verizon on August 17, 2000 and approved
5 by this Commission on November 13, 2000.

6 3. Verizon failed to issue a confirmation of the order by July 15, 2004, Integra's
7 requested due date.

8 4. Verizon failed to deliver the services requested on July 15, 2004.

9 5. On July 19, 2004, Integra escalated the order. Verizon advised that the "dark
10 fiber inquiry denied as do not currently exist, please send sup to cancel." A true and accurate
11 copy of the message from Verizon is attached hereto as Exhibit C.

12 6. Integra contacted its end user customer to advise that Verizon claimed that no
13 underlying facilities were available. The two lines showing active at the location were being
14 used by Verizon.

15 7. On July 27, 2004, the end user customer advised that there were physical cables at
16 its facility, two had been connected for services previously provided by Verizon, but the end user
17 customer had terminated its agreement with Verizon. If Verizon was still showing the two
18 cables as live, Verizon was in error because the services had been terminated many months
19 earlier.
20

21 8. On July 29, 2004, Integra contacted Verizon Field Engineer Rob H. Whitford for
22 clarification on why this order was denied. On August 3, 2004, Mr. Whitford generated the e-
23 mail attached as Exhibit D. In the e-mail, Mr. Whitford acknowledges that the two strands of
24 fiber are not being used by Verizon and should be made available to Integra.
25

1 9. Integra heard nothing for one week. Integra then contacted Verizon to find out
2 the status of the order. Instead of provisioning the two strands of fiber, Verizon representative
3 Shandra Botts told Integra that “the only way to verify facilities is another order as a request for
4 inquiry.”

5 10. Integra resubmitted its inquiry on August 10, 2004, 40 days after the initial
6 request.

7 11. A full week later, on August 17, 2004, Verizon rejected the second request for the
8 two dark fiber strands, saying:
9

10 Since only two fibers enter this premise, CLEC occupation of those fibers would result in
11 zero percent remaining. Verizon is not required to grant dark fiber requests when the
result is less than 20 percent of fibers remaining available for Verizon.

12 *Electronic mail message from Shandra M. Botts of Verizon to Roxanne Richards of Integra,*
13 *dated August 17, 2004 at 8:45am. A true and accurate copy is attached as Exhibit E.*

14 12. I visited the end user customer premise on August 20, 2004. At this first demarc,
15 I discovered 24 fibers at the location, 2 of which were fully connected and 22 that were
16 physically present but did not appear to be connected.

17 13. I also discovered a second demarc for the building, containing additional Verizon
18 facilities. The end user had sub-leased a portion of the upstairs of its building to a tenant in the
19 banking business, specifically, telemarketing and credit card issuance. This demarc contained
20 twelve additional strands of fiber, and one strand of copper, both of which entered the building at
21 the demarc, were connected to a main panel, and ran upstairs. None of the facilities at the
22 second demarc were currently in service. I took a photograph of the building showing the
23 locations of the two demarcs. True and accurate copies of the photographs are attached as
24 Exhibit G.
25

1 14. Upon discovery of the 22 additional strands of fiber at the first demarc, and the
2 discovery of the twelve additional fiber and copper strands at the second demarc, I requested
3 further explanation from Verizon on its rejection of this order. The explanation was requested on
4 August 23, 2004. I sent an e-mail to Verizon representative Bill Wells. A true and accurate
5 copy of the e-mail is attached as Exhibit I.

6 15. On August 24, 2004, Verizon representative Bill Wells responded as follows:

7
8 Although 24 fibers are present in the entrance cable, only two are spliced through, the
9 other twenty-two are dead at the first splice point. Since splicing is not required to meet a
10 dark fiber request the calculation goes like this:

11 2 of 2 equals 100% leaving 0% available.

12 By the way, I was off on the policy, although it doesn't change the outcome. Verizon's
13 policy does not allow dark fiber to occupy more than 25% of our cable, reserving 75% for
14 our use.

15 A true and accurate copy of this e-mail message is attached as Exhibit H.

16 16. Verizon disclosed that there was copper available to the location, but no one from
17 Verizon ever disclosed the existence of the second demarc containing fiber as well as copper,
18 more than ample facilities to fill Integra's order.

19 17. Integra escalated the order and on October 26, 2004 was advised that two dark
20 fiber could be spliced in provided Integra signed Verizon's proposed TRO Amendment to the
21 Interconnection Agreement.

1 18. Even in the absence of the second non-disclosed demarc, Verizon improperly
2 denied Integra's order given that the first demarc contains adequate facilities to fill Integra's
3 order with two fibers already connected and no splicing necessary, and pursuant to the provisions
4 of the Interconnection Agreement and the Triennial Review Order, Verizon must fulfill this
5 order.

6 Further affiant sayeth naught:

7 Date: November ____, 2004
8

9 _____
10 Steve Fisher
11 Director of Network Engineer

12 STATE OREGON)
13) ss
14 COUNTY OF MULTNOMAH)

15 The undersigned, a notary public for and in the State and County aforesaid DOES
16 HEREBY CERTIFY that STEVE FISHER, personally known to me to be the same person
17 whose name is subscribed to the foregoing instrument appeared before me on this day and
18 acknowledged that he signed and delivered the foregoing instrument of his own free and
19 voluntary will, and delivered such instrument for the uses and purposes therein set forth.

20 Given under my hand and seal this ____ day of November, 2004.

21 _____
22 Notary Public

23 (Seal)

24 My commission expires: _____
25

-----Original Message-----

From: bill.wells@verizon.com [mailto:bill.wells@verizon.com]
Sent: Tuesday, August 24, 2004 7:29 AM
To: Fisher, Steve
Cc: Richards, Roxanne; Fisher, Steve
Subject: RE: Integra Telecom PON RR081004UDFINQ, Verizon Order
CGC42243861 27 -- Rejection

Hi Steve,

Although 24 fibers are present in the entrance cable, only two are spliced through, the other twenty two are dead at the first splice point. Since splicing is not required to meet a dark fiber request the calculation goes like this:

2 of 2 equals 100% leaving 0% available.

By the way, I was off on the policy, although it doesn't change the outcome. Verizon's policy does not allow dark fiber to occupy more than 25% of our cable, reserving 75% for our use.
My apology for the confusion,
Bill Wells
IOF Planner - Network Engineering
Verizon - Everett, Washington