

August 6, 2014

*Via E-File and UPS Overnight Delivery*

Oregon Public Utility Commission  
ATTN: Filing Center  
3930 Fairview Industrial Drive SE  
Salem, Oregon 97302-1166

RE: In the Matter of QWEST CORPORATION d/b/a CENTURYLINK QC Petition for  
Commission Approval of 2014 Addition to Non-Impaired Wire Center List.  
Docket No. UM 1702

Dear Filing Center:

Attached for filing are the Comments of Integra. The original and three copies of the Comments are being sent to the Commission by UPS overnight delivery. Also attached is a Certificate of Service.

Sincerely,



Kim K. Wagner  
Legal & Regulatory Administrator  
Integra  
Direct: 763-745-8468  
Fax: 763-745-8459  
[Kim.Wagner@integratelecom.com](mailto:Kim.Wagner@integratelecom.com)

Enclosures

cc: Service List

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UM 1702**

In the Matter of

QWEST CORPORATION d/b/a  
CENTURYLINK QC

**CERTIFICATE OF SERVICE**

Petition for Commission Approval of 2014  
Addition to Non-Impaired Wire Center List.

I hereby certify that on August 6, 2014, I filed the attached Comments of Integra, via e-file, with the OPUC Filing Center. The original and three copies of the Comments are being sent by UPS overnight delivery to:

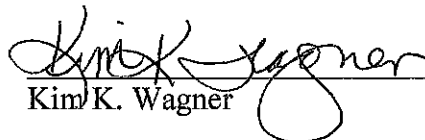
Oregon Public Utility Commission  
ATTN: Filing Center  
3930 Fairview Industrial Drive SE  
Salem, Oregon 97302-1166  
([puc.filingcenter@state.or.us](mailto:puc.filingcenter@state.or.us))

Electronic copies of the same are being served upon the following parties:

Charles L. Best  
William E. Hendricks, III  
Jason W. Jones

[charlesbestlaw@q.com](mailto:charlesbestlaw@q.com)  
[tre.hendricks@centurylink.com](mailto:tre.hendricks@centurylink.com)  
[jason.w.jones@state.or.us](mailto:jason.w.jones@state.or.us);

Dated: August 6, 2014.

  
\_\_\_\_\_  
Kim K. Wagner

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

UM 1702

In the Matter of

QWEST CORPORATION, dba  
CENTURYLINK QC

Petition for Approval of 2014 Addition to  
Non-Impaired Wire Center List.

**COMMENTS OF INTEGRA**

Integra Telecom of Oregon, Inc., on behalf of itself and its Oregon affiliates Electric Lightwave, LLC, Eschelon Telecom of Oregon, Inc., United Communications, Inc., d/b/a UNICOM, Oregon Telecom Inc., Advanced TelCom, Inc., and Shared Communications, Inc., (collectively referred to as “Integra”) respectfully provides these comments to Qwest Corporation dba: CenturyLink QC’s (“CenturyLink”), June 23, 2014 Petition for Approval of 2014 Additions to the Non-Impaired Wire Center List.

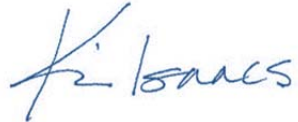
A change in a wire center’s non-impairment classification, as CenturyLink is requesting, will permanently<sup>1</sup> alter the availability of unbundled network elements such as dark fiber, unbundled DS3 transport, and unbundled DS1 transport so careful scrutiny of CenturyLink’s petition is warranted before granting its request. Integra appreciates the steps taken by Commission staff’s to review the supporting data CenturyLink presented in this docket. Integra completed its review of the fiber-based collocation data submitted by CenturyLink for the Portland Belmont (PRLDOR13) wire center and spoke to Commission

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1 47 C.F.R § 51.319 (i) ...Once a wire center is determined to be a Tier 1 wire center, that wire center is not subject to later reclassification as a Tier 2 or Tier 3 wire center.

staff regarding the staff's review of CenturyLink's supporting data. Based on these evaluations, Integra is unopposed to CenturyLink's petition to change Portland Belmont (PRLDOR13) wire center from a Tier 2 wire center to a Tier 1 wire center.

RESPECTFULLY submitted this 6th day of August, 2014.



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