

June 30, 2015

*Via E-File and UPS Overnight Delivery*

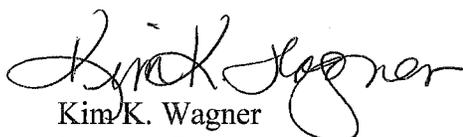
Oregon Public Utility Commission  
ATTN: Filing Center  
3201 High Street SE  
Salem, OR 97301-3612

RE: In the Matter of CENTURYLINK/QWEST, Access Service Ordering and Billing  
System Consolidation Plan.  
Docket No. UM 1737

Dear Filing Center:

Enclosed for filing is the Petition to Intervene of Integra. The original and one copy of this document are being sent to the Commission by UPS overnight delivery. Also enclosed 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: Ron Trullinger, Regulatory Affairs Director  
CenturyLink

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UM 1737**

In the Matter of

CENTURYLINK/QWEST,

**CERTIFICATE OF SERVICE**

Access Service Ordering and Billing System  
Consolidation Plan.

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  
3201 High Street SE  
Salem, OR 97301-3612  
(puc.filingcenter@state.or.us)

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

Ron Trullinger

ron.trullinger@centurylink.com

Dated: June 30, 2015.

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

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**DOCKET NO. UM 1737**

In the Matter of

CENTURYLINK/QWEST,

Access Service Ordering and Billing  
System Consolidation Plan.

PETITION TO INTERVENE  
OF INTEGRA

NAME OF PETITIONER: Integra

ADDRESS: 18110 SE 34<sup>th</sup> Street, Building One, Suite 100, Vancouver, Washington  
98683

PHONE NUMBER: 360-558-4318

E-MAIL ADDRESS: [dkdenney@integratelecom.com](mailto:dkdenney@integratelecom.com)

NAME OF COMPANY REPRESENTATIVE FOR PETITIONER: Douglas Denney

REPRESENTATIVE'S ADDRESS: 18110 SE 34<sup>th</sup> Street, Building One, Suite 100,  
Vancouver, Washington 98683

REPRESENTATIVE'S PHONE NUMBER: 360-558-4318

REPRESENTATIVE'S E-MAIL ADDRESS: [dkdenney@integratelecom.com](mailto:dkdenney@integratelecom.com)

IF THE PETITIONER IS AN ORGANIZATION, THE NUMBER OF MEMBERS IN  
AND THE PURPOSES OF THE ORGANIZATION:

N/A

NATURE AND EXTENT OF THE PETITIONER'S INTEREST IN THE  
PROCEEDINGS:

Integra Telecom of Oregon, Inc., OPUC Docket No. CP 348, on behalf of itself and its Oregon affiliates Electric Lightwave, LLC, OPUC Docket No. CP 442, Eschelon Telecom of Oregon, Inc., OPUC Docket No. CP 938, United Communications, Inc., d/b/a UNICOM, Docket No. CP 483; Oregon Telecom Inc., Docket No. CP 956; Advanced TelCom, Inc., Docket No. CP 526; and Shared Communications, Inc., Docket No. CP 351 (collectively "Integra"), is a Competitive Local Exchange Company (CLEC) certified to provide telecommunications service in the State of Oregon. Integra competes with CenturyLink in the CenturyLink service territory and may be impacted by

CenturyLink's petition.

**THE ISSUES THE PETITIONER INTENDS TO RAISE AT THE PROCEEDINGS:**

Integra relies upon CenturyLink's OSS in order to purchase wholesale services from CenturyLink and is thus impacted by CenturyLink's OSS transition.

**PETITIONER'S SPECIAL KNOWLEDGE OR EXPERTISE, IF ANY, THAT WOULD ASSIST THE COMMISSION IN RESOLVING THE ISSUES IN THE PROCEEDINGS:**

Integra has knowledge and expertise that will assist the Commission and the parties in resolving the issues presented in this proceeding. Integra is an active participant in CenturyLink's Change Management Process involving the OSS transition and understands the features and functionalities of CenturyLink's OSS.

**NAMES, ELECTRONIC ADDRESSES, TELEPHONE NUMBERS, AND PHYSICAL ADDRESSES OF THE REPRESENTATIVES THAT PETITIONER WOULD LIKE ADDED TO THE SERVICE LIST IN THIS DOCKET:**

Douglas Denney  
Integra  
Vice President, Costs & Policy  
18110 SE 34<sup>th</sup> Street  
Building One, Suite 100  
Vancouver, Washington 98683  
[dkdenney@integratelecom.com](mailto:dkdenney@integratelecom.com)  
Direct: 360-558-4318

Based on the information provided above in accordance with the Commission's rules of procedure, I request to participate in these proceedings as a party. I, or the organization that I represent, will not unreasonably broaden the issues, burden the record, or delay the proceedings. OAR 860-001-0300.



\_\_\_\_\_  
Petitioner or Petitioner's Representative

June 30, 2015

\_\_\_\_\_  
Date