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Arizona Corporation Commission  
1200 West Washington Street  
Phoenix, AZ 85007

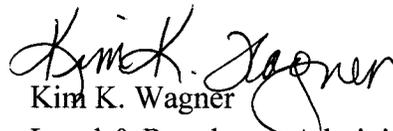
DOCKETED BY 

RE: In the Matter of the Application of Dieca Communications dba Covad  
Communications Company, et al.  
Docket Nos. T-03632A-06-0091  
T-03406A-06-0091  
T-03267A-06-0091  
T-03432A-06-0091  
T-04302A-06-0091  
T-01051B-06-0091

Dear Docket Control:

Enclosed for filing are the original and 13 copies of the Comments of Eschelon Telecom of Arizona, Inc., Mountain Telecommunications, Inc., and Electric Lightwave, LLC, all doing business as Integra Telecom, provided as an update to Integra's October 4, 2013 comments, in connection with the above-referenced docket.

Sincerely,



Kim K. Wagner  
Legal & Regulatory Administrator  
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Enclosures

cc: Parties of Record

1 **BEFORE THE ARIZONA CORPORATION COMMISSION**

2 BOB STUMP  
Chairman  
3 GARY PIERCE  
Commissioner  
4 BRENDA BURNS  
Commissioner  
5 BOB BURNS  
Commissioner  
6 SUSAN BITTER SMITH  
Commissioner

7  
8 IN THE MATTER OF THE APPLICATION  
OF DIECA COMMUNICATIONS DBA  
9 COVAD COMMUNICATIONS COMPANY,  
ESCHELON TELECOM OF ARIZONA, INC.,  
10 MCLEODUSA TELECOMMUNICATIONS  
SERVICES, INC., MOUNTAIN  
11 TELECOMMUNICATIONS, INC., XO  
COMMUNICATIONS SERVICES, INC. AND  
12 QWEST CORPORATION REQUEST FOR  
COMMISSION PROCESS TO ADDRESS  
13 KEY UNE ISSUES ARISING FROM  
14 TRIENNIAL REVIEW REMAND ORDER,  
INCLUDING APPROVAL OF QWEST WIRE  
15 CENTER LISTS

Docket Nos. T-03632A-06-0091  
T-03406A-06-0091  
T-03267A-06-0091  
T-03432A-06-0091  
T-04302A-06-0091  
T-01051B-06-0091

COMMENTS OF ESCHELON  
TELECOM OF ARIZONA, INC.,  
MOUNTAIN  
TELECOMMUNICATIONS, INC.,  
AND ELECTRIC LIGHTWAVE,  
LLC, ALL DOING BUSINESS AS  
INTEGRA TELECOM

16  
17 Eschelon Telecom of Arizona, Inc., Mountain Telecommunications, Inc., and Electric  
18 Lightwave, LLC, all doing business as Integra Telecom (collectively referred to as "Integra")  
19 respectfully provides this update to our October 11, 2013 comments submitted in response to  
20 Qwest Corporation dba: CenturyLink QC's ("CenturyLink"), September 4, 2013 Application for  
21 Approval of 2013 Additions to the Non-Impaired Wire Center List.

22  
23 **Background**

24 On September 4, 2013 CenturyLink filed with the Commission an Application for  
25 Approval of 2013 Additions to the Non-Impair Wire Center List ("2013 Application"). In the  
26 2013 Application, CenturyLink requested that the Mesa Main (MESAAZMA), Superstition West  
27 (SPRSAZWE), Tucson Main (TCSNAZMA) wire center classifications be changed from Tier 2  
28

1 to Tier 1 based on the number of fiber-based collocations in each central office. The impact and  
2 permanency of changes in wire center classifications lead Integra to undertake a careful  
3 evaluation of the highly confidential data CenturyLink provided to Integra.

4  
5 On October 4 2013, Integra submitted comments in this docket which provided the status  
6 of its evaluation. At the time of its October 4<sup>th</sup> comments, Integra reported it had not received  
7 responses from two carriers that it needed to confirm the presence of four fiber-based collocators  
8 in the Mesa Main and Superstition West wire centers. Integra objected to CenturyLink request to  
9 change the wire center classifications of Mesa Main and Superstition West on the ground that the  
10 record was insufficient to support CenturyLink's request. In addition, Integra requested that it be  
11 allowed to update the record on October 11, 2013 to provide an update on its verification efforts  
12 in the Mesa Main and Superstition West wire centers.

13  
14 Integra filed updated comments on October 11, 2013 which stated that it received  
15 additional verification from one carrier. This carrier's response verified the presence of four  
16 fiber-based collocators in Mesa Main. Integra withdrew its objections to CenturyLink's request  
17 to re-classify the Mesa Main wire center from Tier 2 to Tier 1. Integra also noted that, it was  
18 actively working with the remaining carrier and CenturyLink to confirm the number of fiber-  
19 based collocators in the Superstition West wire center and expected it would have the one  
20 remaining carrier's verification shortly.

21  
22 Integra received a response from one the remaining carrier. This carrier's response  
23 verified the four fiber-based collocators needed to change the classification of the Superstition  
24 West wire center from Tier 1 to Tier 2.

25  
26 **Conclusion**

27  
28 Integra completed its evaluation verifying the number of fiber-based collocators in Mesa  
Main, Superstition West, and Tucson Main, therefore, Integra withdraws its previous objections

1 to CenturyLink's request to change the classification of Mesa Main and Superstition West from  
2 Tier 2 to Tier 1. Integra is unopposed to CenturyLink's application that the following wire  
3 centers will be classified as below, effective upon the Commission's order:  
4

STATE	WIRE CENTER	CLLI8	TIER	NO IMPAIRMENT FOR
AZ	Mesa Main	MESAAZMA	Tier 1	DS1, DS3 Transport & DF
AZ	Superstition West	SPRSAZWE	Tier 1	DS1, DS3 Transport & DF
AZ	Tucson Main	TCSNAZMA	Tier 1	DS1, DS3 Transport & DF

8 RESPECTFULLY submitted this 16th day of October, 2013.

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10 

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12 

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16 The Original and 13 copies of the  
17 foregoing were filed, via UPS  
18 overnight delivery, this 16th day  
19 of October, 2013 with:

19 Docket Control  
20 Arizona Corporation Commission  
21 1200 West Washington Street  
22 Phoenix, Arizona 85007

21 Copies of the foregoing were mailed  
22 this 16th day of October, 2013 to:

23 Jane Rodda \*\*  
24 Administrative Law Judge  
25 Arizona Corporation Commission  
26 1200 West Washington Street  
27 Phoenix, AZ 95012

26 Maureen A. Scott \*\*  
27 Legal Division  
28 Arizona Corporation Commission  
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Phoenix, AZ 85007

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\*\*Confidential/Highly Confidential Protective Order signed