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ARIZONA CORP COMMISSION  
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ORIGINAL

Docket Control  
Arizona Corporation Commission  
1200 West Washington Street  
Phoenix, AZ 85007

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

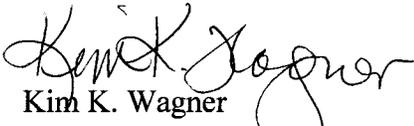
Arizona Corporation Commission  
DOCKETED  
AUG 01 2014

DOCKETED BY 

Dear Docket Control:

Enclosed are the original and 13 copies of Comments of Eschelon Telecom of Arizona, Inc., Mountain Telecommunications, Inc., and Electric Lightwave, LLC, all doing business as Integra Telecom, in connection with the above-referenced docket.

Please feel free to contact me should you have any questions.

Sincerely,  
  
Kim K. Wagner  
Legal & Regulatory Administrator  
Integra Telecom  
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[Kim.Wagner@integratelecom.com](mailto:Kim.Wagner@integratelecom.com)

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

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

17  
18 Eschelon Telecom of Arizona, Inc., Mountain Telecommunications, Inc., and  
19 Electric Lightwave, LLC, all doing business as Integra Telecom (collectively referred to  
20 as "Integra") respectfully provide these comments to Qwest Corporation dba:  
21 CenturyLink QC's ("CenturyLink"), June 27, 2014 Application for Approval of 2014  
22 Additions to the Non-Impaired Wire Center List.  
23

24 **Background**

25 On June 27, 2014 CenturyLink filed with the Commission an Application for  
26 Approval of 2014 Additions to the Non-Impair Wire Center List ("2014 Application"). In  
27 its 2014 Application, CenturyLink requested that the Scottsdale (SCDLAZMA) wire  
28

1 center classifications be changed from Tier 2 to Tier 1, based on the number of fiber-  
2 based collocations in the wire center.

3 On June 23, 2014 CenturyLink sent a notice to CLECs informing them that they  
4 would be filing data with the Commission in support of its non-impairment request and  
5 notified CLECs that, "Affected carriers must review the information and file any objections to  
6 the proposed designations on or before August 1, 2014 in Docket Number T-03632A-06-0091."<sup>1</sup>

8 On June 30, 2014 Integra requested access to CenturyLink's highly confidential  
9 information in support of its 2014 Application. Integra received the highly confidential  
10 information on July 3, 2014, at which time Integra began a data verification process. The  
11 2007 multi-state settlement in the Matter of the Investigation into Qwest Wire Center  
12 Data<sup>2</sup> contemplated that the parties would have 30 days to review the confidential  
13 supporting data in future wire center proceedings.

### 15 Discussion

16 A change in a wire center's non-impairment classification, as CenturyLink is  
17 requesting, would permanently<sup>3</sup> alter the availability of unbundled network elements such  
18 as dark fiber, unbundled DS3 transport and unbundled DS1 transport, by limiting which  
19 unbundled elements the ILEC must make available to competitive LECs. DS1 transport  
20 is not available as an unbundled network element ("UNE") between wire centers  
21 classified as Tier 1, and Dark Fiber and DS3 transport are not available as UNEs between  
22 a Tier 1 wire center and another wire center classified as either Tier 1 or Tier 2. In order  
23 to be classified as a Tier 1 wire center there must be at least four fiber-based collocators  
24

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25  
26 1 See: [http://wholesale.centurylinkapps.com/cnla\\_pub\\_files/NETW.ANNC.06.20.14.F.12485.Non-Impaired\\_Wire\\_List.doc](http://wholesale.centurylinkapps.com/cnla_pub_files/NETW.ANNC.06.20.14.F.12485.Non-Impaired_Wire_List.doc)

27 2 Arizona Docket T-03632A-06-0091 Decision Number: 70355 Exhibit A, Page 11

28 3 47 C.F.R § 51.319 (3)(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"

1 in the wire center. The FCC defines a fiber-based collocator as follows:

2 A fiber-based collocator is any carrier, unaffiliated with the incumbent  
3 LEC, that maintains a collocation arrangement in an incumbent LEC wire  
4 center, with active electrical power supply, and operates a fiber optic cable  
5 or comparable transmission facility that (1) terminates at a collocation  
6 arrangement within the wire center; (2) leaves the incumbent LEC wire  
7 center premises; and (3) is owned by a party other than the incumbent  
8 LEC or any affiliate of the incumbent LEC except as set forth in this  
9 paragraph . Dark fiber obtained from an incumbent LEC on an  
indefeasible right of use basis shall be treated as non-incumbent LEC  
fiber-optic cable. Two or more affiliated fiber-based collocators in a single  
wire center shall collectively be counted as a single fiber-based collocator.  
For purposes of this paragraph, the term affiliate is defined by 47 U.S.C. §  
153(1) and any relevant interpretation in this Title.<sup>4</sup>

10 Therefore, when scrutinizing a wire center petition such as the one presented in this  
11 docket, it is imperative that the commission confirm with certainty that the FCC's  
12 collocation criteria have been met.

13  
14 Integra initiated a careful review of the highly confidential data provided by  
15 CenturyLink on July 3, 2014. Based on Integra's review of the highly confidential data  
16 and response from carriers, Integra does not object to CenturyLink's request to reclassify  
17 the Scottsdale Main (SCDLAZMA) as Tier 1. The attached highly confidential Exhibit A  
18 contains the results of Integra's review.

19  
20 **Conclusion**

21 Due to the permanency and impact of changes in wire center classifications,  
22 careful scrutiny of CenturyLink's petition is warranted before granting its requests.  
23 Integra completed its review of the fiber-based collocation data submitted by  
24 CenturyLink for the Scottsdale Main (SCDLAZMA) wire center. Based on this  
25 evaluation, Integra is unopposed to CenturyLink's application to change Scottsdale  
26

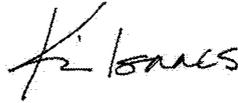
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28 

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4 47 C.F.R. § 51.5

1 (SCDLAZMA) wire center from a Tier 2 wire center to a Tier 1 wire center.

2 RESPECTFULLY submitted this 31<sup>st</sup> day of August, 2014.

3  
4 

5  
6 

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13  
14 **Original and 13 copies filed**  
15 **via UPS overnight delivery**  
16 **this 31<sup>st</sup> day of July, 2014, to:**

17 Docket Control Center  
18 Arizona Corporation Commission  
19 1200 West Washington Street  
20 Phoenix, Arizona 85007

21 **Copies of the foregoing delivered**  
22 **via UPS overnight delivery this**  
23 **31<sup>st</sup> day of July, 2014 to:**

24 Janice M. Alward  
25 Chief Counsel, Legal Division  
26 Arizona Corporation Commission  
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28 Phoenix, Arizona 85007

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6 **Copies of the foregoing sent via**  
7 **U.S. Mail this 31<sup>st</sup> day of July, 2014, to:**

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9 Associate General Counsel  
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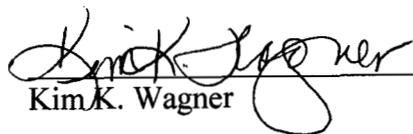
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19 Phoenix, AZ 85027

20 McLeod USA Telecommunications Services, LLC  
21 Attn: Stephanie D. Marsh  
22 400 1 Rodney Parham Road  
23 Little Rock, AR 72212

24 Katherine Mudge  
25 Director, Regulatory Affairs & Litigation  
26 MegaPath Corporation  
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Senior Counsel  
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Denver, CO 80230

  
Kim K. Wagner

**Exhibit A – PUBLIC/REDACTED**

**Integra Fiber-Based Collocator Verification**

<b>Wire Center Name</b>	<b>Wire Center CLLI</b>	<b>CLEC Name</b>	<b>Verification Status</b>
Scottsdale	<b>REDACTED</b>		