

August 1, 2014

Via E-File

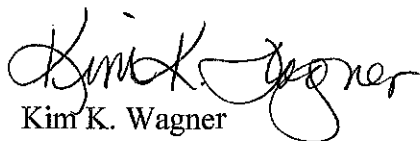
Dr. Burl W. Haar
Minnesota Public Utilities Commission
121 Seventh Place East, Suite 350
St. Paul, MN 55101-2147

Re: In the Matter of Qwest Corporation dba CenturyLink QC's Petition for Approval of Additions for 2014 to the Non-Impaired Wire Center List
MPUC Docket No.: P-421/AM-14-550

Dear Dr. Haar:

Attached for filing in the above-referenced matter is the Comments of Integra, in connection with the above docket. Also attached is a Certificate of Service.

Sincerely,

A handwritten signature in black ink that reads "Kim K. Wagner".

Kim K. Wagner
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cc: Parties of Record

STATE OF MINNESOTA
BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

Beverly Jones Heydinger	Chair
David C. Boyd	Commissioner
Nancy Lange	Commissioner
Dan Lipschultz	Commissioner
Betsy Wergin	Commissioner

In the Matter of Qwest Corporation dba CenturyLink QC's Petition for Approval of Additions for 2014 to the Non-Impaired Wire Center List **MPUC Docket No.: P-421/AM-14-550**

CERTIFICATE OF SERVICE

I hereby certify that on August 1, 2014, the attached Comments of Integra, were e-filed with the Minnesota Public Utilities Commission, and that copies of this filing were distributed to the following parties by electronic filing, e-mail, or by US Mail, as designated on the Official Service List on file with the Minnesota Public Utilities Commission.

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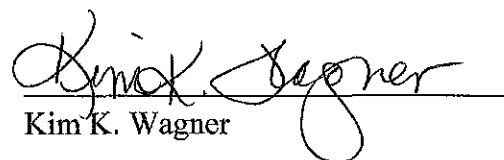
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Dated: August 1, 2014.


Kim K. Wagner

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**In the Matter of Qwest Corporation dba
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Docket No. P-421/AM-14-550

COMMENTS OF INTEGRA

Eschelon Telecom of Minnesota, Inc. and Integra Telecom of Minnesota, Inc. (collectively referred to as "Integra"), respectfully provides these comments to Qwest Corporation dba: CenturyLink QC's ("CenturyLink") June 30, 2014 Petition for Approval of 2014 Additions to the Non-Impaired Wire Center List.

Background

On June 30, 2014, CenturyLink filed with the Commission, a Petition for Approval of 2014 Additions to the Non-Impair Wire Center List ("2014 Petition"). In its 2014 Petition, CenturyLink requested that the Blaine (BLANMNBL) wire center classification be changed from Tier 3 to Tier 2 based on the business line counts in the wire center.

On June 23, 2014, prior to filing its 2014 Petition with the Commission, CenturyLink sent a notice to CLEC's informing them that they would be filing data with the Commission in support of the non-impairment request and notified CLECs that, "Affected carriers must review

the information and file any objections to the proposed designations on or before August 1, 2014.”¹

On July 1, 2014 Integra requested access to the highly confidential information CenturyLink filed to support its 2014 Petition. Integra received the highly confidential information on July 2, 2014, at which time Integra began a data verification process. The 2007 multi-state settlement in the TRRO Wire Center Dockets² contemplated that the parties would have 30 days to review the confidential supporting data in future wire center proceedings.

The Minnesota Department of Commerce sent a request on July 15, 2014 asking companies, identified by CenturyLink as providing services in the Blaine wire center, to verify whether CenturyLink’s data supporting its 2014 Petition is accurate. Integra responded to the Department of Commerce (“Department”) with the results of its verification process on July 22, 2014.

Discussion

A change in a wire center’s non-impairment classification, as CenturyLink is requesting, would permanently³ alter the availability of unbundled network elements such as dark fiber, unbundled DS3 transport, and unbundled DS1 transport by limiting which unbundled elements the ILEC must make available to competitive LECs. Dark Fiber and DS3 transport are not available as unbundled network elements (UNEs) between a Tier 2 wire center and another wire center classified as either Tier 1 or Tier 2. Unbundled DS1 transport is limited to a cap of 10 transport circuits between a Tier 2 wire center and another wire center classified as either Tier 1

¹ See: http://wholesale.centurylinkapps.com/cnla_pub_files/MN_CLEC_Notice_20142.doc

² Docket Nos. P-5692, 5340, 5643, 5323, 465, 6422/M-06-211 and P-999/CI-06-685 (collectively, the “TRRO Wire Center Dockets”) on October 5, 2007 (“TRRO Settlement Order”).

³ 47 C.F.R § 51.319 (3)(ii) “Tier 2 wire centers are those incumbent LEC wire centers that are not Tier 1 wire centers, but contain at least 3 fiber-based collocators, at least 24,000 business lines, or both. Once a wire center is determined to be a Tier 2 wire center, that wire center is not subject to later reclassification as a Tier 3 wire center.”

or Tier 2. In order to be classified as a Tier 2 wire center based on business line count, CenturyLink needs to demonstrate there are at least 24,000 business lines in the wire center⁴. Therefore, when scrutinizing a wire center petition such as the one presented in this docket, it is imperative that the Commission confirm with certainty that the FCC's criteria have been met.

On July 2, 2014 CenturyLink provided its highly confidential line count data in the Blaine wire center. Pursuant to the *TRRO Settlement Order*, CenturyLink masks the line count data for individual CLECs, but provides each CLEC, upon request, access to its own line count data. Integra reviewed its own line count data provided by CenturyLink, in an attempt to determine the accuracy of the information provided by CenturyLink. While Integra's internal data verification process did not provide a line count that was an exact match to the CenturyLink data, the CenturyLink and Integra line counts were close.

Integra understands that the Department is undertaking a broad, carrier specific review of the business line count data. If the Department of Commerce's verification process uncovers large discrepancies in the CenturyLink line count data, Integra objects to CenturyLink's 2014 Petition. Otherwise, Integra does not object to CenturyLink's request to reclassify the Blaine (BLANMNBL) wire center as Tier 2.

Conclusion

Due to the permanency and impact of changes in wire center classifications, careful scrutiny of CenturyLink's petition is warranted before granting its requests. Integra appreciates efforts by the Department to review carrier line count data. Integra has provided the Department with its review of its own line counts and has found its counts to be similar to the counts claimed by CenturyLink. To the extent the Department raises material questions as to the validity of the

⁴ *Id.* § 51.319

line count data provided by CenturyLink, Integra objects to CenturyLink's request to reclassify the Blaine (BLANMNBL) wire center as Tier 2. In the event that the Department does not find material discrepancies in the business line count data, Integra does not object to CenturyLink's request for reclassification.

RESPECTFULLY submitted this, 1st, day of August, 2014.



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