

March 30, 2015

Via ECFS

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: In the Matter of Rural Call Completion, WC Docket Number 13-39

Dear Ms. Dortch:

Integra Telecom Holdings, Inc. and its wholly-owned subsidiaries, as listed in Annex A, (collectively “Integra”) file this letter per paragraph 67 of *Rural Call Completion Order*, WC Docket Number 13-39, in support of Integra’s conclusion that it is not a “covered provider” as defined in 47 C.F.R. § 64.2101(c), and therefore, is not required to submit quarterly Rural Call Completion reports pursuant to the *Order*.

The Federal Communications Commission clarified in its *Rural Call Completion Order* that a provider that hands all long-distance calls to a single IXC under a contract, or allocates the hand off of long-distance calls to multiple providers based on fixed rules,¹ is not considered a “covered provider” with quarterly rural call completion reporting obligations. Integra does not make the initial long-distance call path choice for voice service subscriber lines. Integra hands off its switched long distance traffic to **[Begin confidential]**

[End confidential] and its switchless long distance traffic to **[Begin confidential]**
[End confidential].

The aforementioned providers, identified as having the reporting responsibility, have been provided copies of this letter.

Sincerely,



Douglas Denney
Vice President, Costs & Policy
360-588-4318
dkdenney@integratelecom.com

¹ ¶ 20, *Rural Call Completion*, WC Docket No. 13-39, Report and Order and Further Notice of Proposed Rulemaking, 28 FCC Rcd 16154 (2013).

In the Matter of Rural Call Completion

WC Docket Number 13-39

Integra Telecom Holdings, Inc. Letter

March 30, 2015

Page 2

Annex A

1. Advanced TelCom, Inc., FRN: 0003726197
2. Electric Lightwave, LLC, FRN: 0015577745
3. Eschelon Telecom of Arizona, Inc., FRN: 0003768082
4. Eschelon Telecom of Colorado, Inc., FRN: 0003767852
5. Eschelon Telecom of Nevada, Inc., FRN: 0003768074
6. Eschelon Telecom, Inc., FRN: 0010289114
7. Integra Telecom of Minnesota, Inc., FRN: 0005069760
8. Integra Telecom of North Dakota, Inc., FRN: 0005071014
9. Integra Telecom of Oregon, Inc., FRN: 0005069497
10. Integra Telecom of Utah, Inc., FRN: 0005069570
11. Integra Telecom of Washington, Inc., FRN: 0005069588
12. Mountain Telecommunications of AZ, Inc., FRN: 0004351391
13. One Eighty Communications, Inc., FRN: 0005075866
14. Oregon Telecom, Inc., FRN: 0009194960
15. Scott-Rice Telephone Co., FRN: 0002648285
16. Shared Communications Services, Inc., FRN: 0003753795
17. United Communications, Inc. d/b/a UNICOM, FRN: 0003740511
18. World Communications, Inc. (WCI), FRN: 0004257010
19. Integra Telecom Holdings, Inc., FRN: 0004257010