



WILLIAMS MULLEN

Direct Dial: 703.760.5203
EQuill@williamsmullen.com

June 30, 2006

VIA OVERNIGHT DELIVERY

Reece McAlister, Executive Secretary
Georgia Public Service Commission
244 Washington Street, S.W.
Atlanta, GA 30334

Re: Electric Lightwave, LLC – Application for Authority to Operate Under
the “Doing Business As” Name Integra Telecom

Dear Secretary McAlister,

Electric Lightwave, LLC (“ELI” or “Applicant”), by and through undersigned counsel, hereby advises the Georgia Public Service Commission (“Commission”), and to the extent required seeks approval, for ELI to adopt the “doing business as” (“d/b/a”) name Integra Telecom and to operate under that name in Georgia. For the reasons set forth below, Applicant respectfully submits that the proposed d/b/a will enable ELI to better integrate its product offerings with its sister Integra operating companies and thereby prevent customer confusion. As a result, the proposed change in the name under which ELI operates will serve the public interest.

Applicant further states as follows:

I. Electric Lightwave, LLC

ELI is a provider of integrated local telephone, data, network, and long distance services. ELI generally offers local, long-distance and high-speed broadband transport via a fiber optic network that extends to population centers in major metropolitan areas. In Georgia, ELI is authorized to provide resold interexchange services pursuant to Certificate R-0555 granted by the Commission in Docket No. 9559-U, on September 7, 1999.

Recently, ELI sought approval from the Commission to complete a transaction whereby ELI will become a wholly-owned subsidiary of Integra Telecom Holdings, Inc. (“Integra Holdings”). Applicant was granted approval by the Commission to complete that change in ownership, by order issued by the Commission (also in Docket No. 9559-U).

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Integra Holdings, through its various operating companies, provides facilities-based, integrated communications services, primarily to small and midsize companies located in the business centers of Minnesota, North Dakota, Oregon, Utah, and Washington. Other than through ELI, however, Integra does not hold authority to provide regulated services in Georgia.

II. Designated Contacts

Correspondence or communications pertaining to this Letter Application should be directed to:

Edward S. Quill, Jr.
Michael W. Fleming
Williams Mullen
8270 Greensboro Drive, Suite 700
McLean, VA 22102
Telephone: (703) 760-5200
Facsimile: (703) 748-0244
E-Mail: EQuill@williamsmullen.com
MFleming@williamsmullen.com

III. Use of a "D/B/A" Name

In connection with the recently proposed acquisition of ELI by Integra Holdings, the two companies are working to better integrate and coordinate ELI's operations with those of the Integra operating companies. Accordingly, ELI now proposes to adopt the d/b/a Integra Telecom and operate under that name in Georgia upon completion of the transaction, which is expected to occur on or around July 31, 2006. Although Applicant will operate under this new d/b/a name, the Company's certificate will continue to be held by ELI and ELI's name will not be formally changed.¹

Applicant emphasizes that the proposed d/b/a name will not result in any change in Applicant's corporate structure and will not have any effect on the rates, terms or conditions under which ELI currently provides service.² Furthermore, ELI has initiated a program designed to ensure that all of ELI's existing customers receive advanced written notice of the proposed

¹ The companies will file documents with the appropriate Georgia agency in connection with the registration of the d/b/a name upon closing of the transaction, which is currently scheduled to occur on or around July 31, 2006. Applicant will file the processed documents with the Commission once ELI has received them.

² Currently, ELI maintains a tariff on file with the Commission in connection with the services rendered. Attached as Exhibit A is an adoption notice and new tariff cover page reflecting the new d/b/a name for that tariff, to be effective upon closing, which is currently scheduled to occur on or around July 31, 2006. ELI respectfully requests that the Commission append the adoption notice to the Company's tariff.

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d/b/a and is working closely with its customer base to avoid any customer confusion.³ Thus, the d/b/a name will not in any way harm or inconvenience ELI's customers or adversely affect ELI's managerial, technical, or financial resources.

In addition, in their application seeking Commission approval of the change of control of ELI (Docket No. 9559-U), the companies notified the Commission that they intended to adopt a uniform brand name. Specifically, the companies stated:

For branding and customer identity purposes, Integra intends, as part of a transition plan, to adopt a simple, easy to understand single brand entity, utilizing the Integra name, the ELI name or a combination of the two names. To the extent necessary, Integra will inform customers and the Commission of these changes and obtain any required consents, including any required consents of the Commission.

See Joint Application of Integra Telecom Holdings, Inc. and Electric Lightwave, LLC for Approval to Transfer of Control of Electric Lightwave, LLC, Docket No. 9559-U, at n. 3.

IV. Public Interest

Applicant respectfully submits that the proposed d/b/a name will serve the public interest. The proposed change in operating name will allow the combined ELI/Integra companies to more seamlessly promote and market their services and prevent customer confusion. Integra's acquisition of ELI is expected to allow Integra to offer a broader range of products and services, and the proposed d/b/a is necessary to ensure a cohesive and coordinated approach to marketing the combined companies' expanded service offerings. Furthermore, given that the rates, terms and conditions will not be affected by ELI's use of the d/b/a, the change in operating name on or around August 1 will not affect the services that those entities receive or otherwise adversely affect ELI customers. Applicant therefore respectfully requests that the Commission review the proposed name change and issue any required approval as soon as possible.


³ A copy of the customer notice informing customers of the d/b/a is provided in Exhibit B. ELI sent this notice to its customers on June 30, 2006.

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V. Conclusion

Applicant respectfully requests that the Commission grant it authority, to the extent necessary, to allow ELI to adopt the Integra Telecom name as a "doing business as" name in the State of Georgia.

Respectfully submitted,



Aloa Stevens
Director, Government & External Affairs
Electric Lightwave, LLC
3 Triad Center, Suite 160
Salt Lake City, UT 84180
Telephone: (801) 924-6356
Facsimile: (801) 924-6363
Email: astevens@czn.com

Edward S. Quill, Jr.
Michael W. Fleming
WILLIAMS MULLEN
8270 Greensboro Drive, Suite 700
McLean, VA 22102
Telephone: (703) 760-5200
Facsimile: (703) 748-0244
Email: EQuill@williamsmullen.com
Email: MFleming@williamsmullen.com

Counsel for Integra Telecom Holdings, Inc.

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LIST OF EXHIBITS

Exhibit A

Tariff Adoption Notice

Exhibit B

Form of Customer Notice

Verification

EXHIBIT A

Tariff Adoption Notice

ADOPTION NOTICE

Electric Lightwave, LLC **d/b/a Integra Telecom** hereby adopts, ratifies, and makes its own, in every respect as if the same had been originally filed and posted by it, all tariffs and supplements containing rates, rules and regulations for furnishing of intrastate communications services in the State of Georgia, filed with the Georgia Public Service Commission by Electric Lightwave, LLC and effective on April 26, 2004.

A revised tariff cover page reflecting the new "doing business as" name is provided herewith.

REGULATIONS AND SCHEDULE OF INTRASTATE CHARGES
APPLYING TO COMMUNICATIONS SERVICES
WITHIN
THE STATE OF GEORGIA

Issued: June 30, 2006

Effective: August 1, 2006

Wirsbinski, Carol
Electric Lightwave, LLC d/b/a Integra Telecom
1201 NE Lloyd Blvd., Suite 500
Portland, Oregon 97232

EXHIBIT B

Form of Customer Notice

June 30, 2006

Dear Valued Electric Lightwave Customer:

In February of this year, Citizens Communications entered into an agreement to sell its subsidiary, Electric Lightwave LLC, to Integra Telecom Holdings, Inc. The respective companies' Boards of Directors, federal regulators and the applicable state Public Utilities Commissions have since approved the transaction. We anticipate that the transaction will be finalized in early August, 2006.

ELI will continue to operate as your service provider; however, as a result of this transaction, ELI will become a wholly owned subsidiary of Integra. Your services, rates and terms will not be affected as a result of this transaction.

Shortly after the transaction is finalized, ELI will begin doing business as Integra Telecom. While you will begin receiving bills with the Integra name and logo, the format of your bill will remain the same. Additionally, Integra plans to enhance your service relationship by staffing customer service and technical personnel in your local market. This is part of the company's unique brand of highly responsive customer service. An "Information Kit" will be sent to you close to the time of closing the transaction, explaining these and other service enhancements coming your way.

Integra has been serving business customers since 1996 and has a reputation in the industry for providing high-quality customer service as well as a proven track record of success in product delivery and operations. Since the merger agreement was announced, we have been working closely with Integra Telecom to ensure a smooth transition of customer information and support.

We look forward to continuing our service relationship and we thank you for the opportunity to serve you. If you have any questions or concerns about your service, or any other matters, please call Electric Lightwave at 1-800-622-4354.

Sincerely,



Melinda White
General Manager
Electric Lightwave, LLC

Verification

VERIFICATION

STATE OF UTAH)
)
COUNTY OF SALT LAKE) SS.

I, Aloa Stewen, being first duly sworn, state that I am Director Government & External Affairs of Electric Lightwave, LLC, that I am authorized to make this Verification on behalf of Electric Lightwave, LLC and that the contents of the foregoing filing are true and correct to the best of my knowledge, information, and belief.

Name: Aloa Stewen

Title: Director Government & External Affairs
Electric Lightwave, LLC

Sworn and subscribed before me this 29 day of June, 2006.

M. Gallegos
Notary Public

My commission expires 03/17/2010

