

**Exh. SP-13
Docket UT-171082
Witness: Susie Paul**

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

**WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,**

Complainant,

v.

**QWEST CORPORATION D/B/A
CENTURYLINK QC,**

Respondent.

DOCKET UT-171082

**EXHIBIT TO
TESTIMONY OF**

Susie Paul

**STAFF OF
WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION**

Email from Jerolyn Ochs to Alice Fiman, dated February 28, 2017

April 6, 2018

Activity Type: Email

Activity Date: 2/28/2017, 2:56:13 PM

To: afiman@utc.wa.gov;

From: Jerolyn.Ochs@CenturyLink.com

**Subject: WA UTC Complaint CAS-20417-Y7K6M8 for Robert Saum Jr.
CRM:0043044**

Attachments: 1

Body:

Ms, Finman-

Here is the analysis of the line extension rule and its application in this situation. Please see below.

The line extension rule, in subsection (2) under definitions, states that "Extension of service" means an extension of company distribution plant for new residential basic local exchange service to a location where no distribution plant of the extending company exists at the time an extension of service is requested. An extension is constructed at the request of one or more applicants for service. Extensions of service do not include trenches, conduits, or other support structure for placement of company-provided facilities from the applicant's property line to the premises to be served. *Extension of service, as defined in this rule, does not apply to extensions of service to developments or to extensions of service for temporary occupancy or temporary service.* (emphasis added)

This request for an extension of service is to a development. Developers obtain service to their developments by entering into a housing development agreement (PAHD) with CenturyLink, which includes certain requirements on the developer to ensure that we have sufficient infrastructure in place and that CenturyLink has a path to run the facilities to serve the development. This timing also gives the company the opportunity to place facilities in a least cost manner, without the more expensive option of cutting pavement or boring underneath roads in finished subdivisions. When a developer has had the opportunity to allow us to serve in the development, and has placed the necessary conduits, poles, etc., that is how a development gets service. If the developer refuses, as was the case here, then the line extension rule does not allow the individual customers to avoid that requirement, as CenturyLink at this time has not placed facilities or ensured capacity to serve the customer or others in the development. Otherwise the exception in the line extension rule that excludes developments would be meaningless

Qwest's catalog, which contains the terms and conditions for the PAHD, states that the company has the *option* to serve in a development if the developer chooses not to enter into a PAHD, but is not required to do so. See, Qwest Exchange and Network Services Catalog No. 2, Section 4.4. C.

Developer Non-Participation. If a Developer/Builder does not enter into a PAHD, the Company, *at its option*, may accept requests for service from individual customers in the subdivision/development area as provided for in **Section 4.2.2** (emphasis added).

This has been CenturyLink's policy and approach for many years (this PAHD provision has been in place since 2008), and CenturyLink does not serve in developments where the developer has not signed a PAHD for the provision of service to the housing development. CenturyLink had further reviewed this approach with telecom Staff, and they were in concurrence with this approach, especially when the customers had alternative service providers available.

At this time, if the homeowner will provide a conduit under the street between the pedestal and his home, CenturyLink can provide service. Because the line extension rule does not apply, there is no allowance for the extension and the homeowner is responsible to provide the path. Otherwise, there is an alternative service provider in the development for landline service. Similarly, other homeowners in this development would be required to provide a path to their homes if they wanted service from CenturyLink.

Jerolyn Ochs

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