Qwest
1600 7th Avenue, Room 3206
Seattle, Washington 98191
Phone: (206) 345-1568
Facsimile (206) 343-4040

Mark Reynolds
Senior Director - Regulatory
Public Policy & Regulatory Affairs

September 7, 2007

Ms. Carole Washburn
Executive Secretary
Washington Utilities and
Transportation Commission
P.O. Box 47250
Olympia, Washington 98504-7250

Re: Docket UT-070986 - Notice of Opportunity to file Written Comments

Dear Ms. Washburn,

Qwest Corporation ("Qwest") makes this filing in response to the Commission's notice of opportunity to file written comments regarding the scope, design and content of a survey to help identify factors preventing the widespread availability and use of broadband technologies.

Introduction

On June 27, 2007, Qwest submitted to the Federal Communications Commission ("FCC"), in CC Docket No. 96-45[1], a summary of its proposal for expanding the nation's access to high-speed Internet service and for initiating reform of the Universal Service Fund. As a part of its comments in this docket, Qwest is attaching a white paper that provides further detail on Qwest's proposal.[2] At the core of Qwest's proposal is a new model of providing universal service support to spur the development of broadband connections to unserved households. Also included in the white paper is a discussion of the processes that must be developed to determine uniform definitions of "unserved areas" and "broadband" and to identify and evaluate the needs of unserved areas.[3]

---

1 CC Docket No. 96-45, *In the Matter of Federal-State Joint Board on Universal Service*

2 The white paper titled *Qwest's Proposal for Broadband Deployment to Unserved Areas,* was filed as an *ex parte* with the FCC pursuant to Section 1.49(f) and 1.1206 of the FCC's rules on July 9, 2007

3 *Qwest's Proposal for Broadband Deployment to Unserved Areas,* pp. 13-16

Broadband Service Availability is Improving both Nationally and within the State of Washington

In addition to information that may be gleaned from Qwest' proposal, Qwest believes that the Commission's inquiry in this matter should be informed by data regarding the current state of broadband deployment. For example, as of June 30, 2006 the FCC estimated that as a nationwide average, 79% of households receiving local service from an incumbent LEC have high-speed DSL available while 93% of households subscribing to cable service from a cable provider have high-speed cable modem service available.[4] As of June 30, 2006, 80% of Washington households receiving local service from an incumbent LEC had high-speed DSL available while 94% of households subscribing to cable service from a cable provider had high-speed cable modem service available.[5]

Nationally, the number of homes and businesses connecting to the Internet increased by 32.6 million (102%), from 31.9 million to 64.6 million in the twelve month period ending June 30, 2006.[6] The number of homes and businesses connecting to the Internet in Washington increased by 800,834 (103%), from 775,027 to 1,575,375 in the full twelve month period ending June 30, 2006.[7]

To aid the Commission's inquiry, Qwest is willing to provide its company-specific broadband deployment data under confidential seal and encourages other broadband providers to do the same.

Identifying and Evaluating the Need of Unserved Areas[8]

The threshold issue in any mapping project is the determination of what unit of geographic measurement should be used in conducting the assessment. The following criteria may be helpful in evaluating the mapping process:

- The geographic measurement adopted should be based on information that is readily available to most broadband providers.
- Reporting by zip code would be the simplest measure to use from an administrative perspective because broadband providers are already required to report broadband data to the FCC using zip code (Form 477).

---

4 High-Speed Services for Internet Access: Status as of June 30, 2006. p. 1 www.qsiconsulting.com/pdf/FCC_**HighSpeed**DataReport%201_31_07.pdf

5 High-Speed Services for Internet Access: Status as of June 30, 2006. Table 14

6 High-Speed Services for Internet Access: Status as of June 30, 2006. Table 10

7 High-Speed Services for Internet Access: Status as of June 30, 2006. Table 10

8 Also see *Qwest's Proposal for Broadband Deployment to Unserved Areas,* pp. 13-16

- If an alternative metric is considered, the metric should be relatively easy-to-use, verifiable, and should not result in a nontrivial delay of implementation or significantly increase the cost of implementation.

Any information provided by the carriers should be treated as strictly confidential. Also, comprehensive mapping for the purpose of evaluating broadband deployment and usage is incomplete without also analyzing the demand side of the equation. Consequently, data regarding home computer ownership and usage is critical to the equation.

Broadband Deployment Support Mechanisms

Qwest supports local initiatives establishing a public/private partnership to maximize existing infrastructure and public assets to extend broadband service to unserved areas with the following provisions:

- Support mechanisms provided via grant programs should target only un-served areas. Accordingly, support mechanisms should not subsidize competition in areas where broadband already exists. Extending broadband grants to communities where the service is already offered by commercial providers creates a disincentive from further investment in rural communities for those companies that are already using private risk capital.
- Monies from support grants should support the most efficient broadband solution for the un-served area.
- The amount of the grant should be capped at 50% of the investment needed to provide broadband services to the un-served area;
- Broadband grant funding should be a one-time payment covering capital costs for installation of the network;
- There should be a transparent application process;
- Broadband needs to be defined. Qwest recommends that the technical standard be defined as a "best effort" rate of data transmission of 1 megabit per second downstream and up to 512 kilobits per second upstream with a level of latency, jitter and packet requirements that supports real-time applications (such as voice over IP or video conferencing).[9]

Conclusion

[9] Latency, jitter and packet loss are the main factors that determine service quality for two-way services. Qwest recommends that the broadband operator be required to provide the capability to transmit, from the testable points of the server to the customer interface, with less than 150ms one-way latency, less than 30ms jitter, and less than 1% packet loss.

Qwest appreciates this opportunity to provide comments and participate in this important and timely inquiry. As these comments and the attachment indicate, Qwest has devoted a significant amount of time and effort to formulate a plan that it believes can further the goals of widespread availability and use of broadband technologies and Qwest intends to remain active at both the federal and state levels to lend support to the cause

Sincerely,

Mark S. Reynolds