


COMMENT FORM FOR: JENNIFER BRANDON, EXECUTIVE DIRECTOR - ID# 24573

Consumer Information	
	Contact Method <input checked="" type="radio"/> Email <input type="radio"/> Mail <input type="radio"/> None
Name	JENNIFER BRANDON, EXECUTIVE DIRECTOR
Organization Company	COMMUNITY VOICE MAIL NATIONAL
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Primary Phone #	Fax #
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Comment Information	
Theme	Open Date 09/12/2010
Filing Support	<input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> Undecided
Source	<input checked="" type="radio"/> Email <input type="radio"/> Mail <input type="radio"/> Phone <input type="radio"/> Web
Public Involvement Lead	John Cupp
Duplicate Comment	<input type="radio"/> Yes <input type="radio"/> No
Description	<p>To Whom It May Concern:</p> <p>Please find attached comments on the proposed merger of CentruyTel and Qwest Communications.</p> <p>If you have any questions, please contact me.</p> <p>Thank you, Jennifer Brandon</p> <p>Jennifer Brandon Executive Director Community Voice Mail National (206) 441-7872 x175 F (206) 443-3755 * jbrandon@cvm.org 2901 Third Avenue, Suite 100 Seattle, WA 98121 www.cvm.org communityvoicemail.blogspot.com</p> <hr/> <p>In addition to the attached comments, Ms. Brandon attended and testified at the January 5 public comment hearing.</p>
Attachments	 WUTC letter Sept 12 2010.pdf



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17 September 2010

Washington Utilities and Transportation Commission
Richard Hemstad Building
1300 S. Evergreen Park Drive S.W.
PO Box 47250
Olympia, Washington
98504-7250

re: Docket UT-100820, Joint application of Qwest Communications International Inc., and CenturyTel, Inc., for approval of indirect transfer of control of Qwest Corporation, Qwest Communications Company LLC, and Qwest LD Corp.

Dear Chairman Goltz, Commissioners Jones and Oshie,

Thank you for the opportunity to submit comments on the proposed merger of CenturyLink and Qwest Communications in WA State. These comments are submitted on behalf of Community Voice Mail (CVM) National, a non-profit organization headquartered in Washington State. CVM provides a free, personal voicemail number and information about jobs, community resources and health alerts to more than 43,000 extremely low-income people annually in 414 cities in 21 states, including nearly 8,000 people across Washington State. Attached is our most recent annual report which illustrates the locations of our operations across the country and within Washington.

CVM fulfills a vital safety net feature for our clients, as well as a gap in the state and nation's goal of ensuring universal telecommunications services. By providing a local telephone number and a private voicemail box, CVM allows our clients to find work, access their health or veterans benefits, find stable housing, shield themselves from abusive relationships, and maintain contact with friends and family.

The vast majority of our clients have no other access to telephony services, they fall in the approximate 7.2% of households below \$15,000 for whom the goal of universal service has yet to be met.¹ The rise in prepaid cell phone service has provided some opportunity to shrink the un and underserved population, but our research suggests that those services are used intermittently (when there is money for minutes), leaving a persistent and distressingly large number of our citizens who do not have access to basic telephone services, much less advanced broadband resources. A typical CVM client keeps their voicemail number for eight months, often then transitioning to more stable circumstances that allow them to afford and maintain more traditional landline or wireless services.

Despite our success in assisting clients to achieve housing, employment, and health care goals, in this economic climate, we continue to see a large population in need.

¹ Telephone Subscribership in the United States (Data through March 2010), Industry Analysis and Technology Division, Wireline Competition Bureau, FCC.
http://www.fcc.gov/Daily_Releases/Daily_Business/2010/db0831/DOC-301241A1.pdf

Our typical client lives on less than \$550/month, receives public assistance of some sort (food stamps, TANF, Medicaid, other), is seeking employment, has 2 children, and increasingly, is a veteran. As much work as we support here in Washington and across the country, there is clearly more to do.

CVM understands the Commission applies a standard of review that the proposed merger must not harm consumers. In prior telecommunications mergers that it has approved, this Commission has imposed a myriad of conditions designed to achieve that goal, including broadband deployment and investment requirements², public purpose funds³, and other consumer protections.

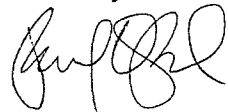
In this case, the merger applicants project that "the strategic merger of Qwest and US West will serve the public interest by producing significant pro-competitive effects that will lead to substantial benefits for customers". Applicants further state that the merger will "generate some \$625M in annual run-rate operating and capital synergies."⁴

CVM does not have the resources to participate as a party to a case of this magnitude and complexity. Not having the benefit of the information provided to the parties, we do not have an opinion as to whether the merger is or is not in the public interest. That decision rests with you.

We ask that as you consider the evidence in this case, you are informed by the information we have provided. While competition may serve well those Washingtonians with access and who can afford a choice in telecommunications services, it unfortunately does not extend to CVM clients. Although our service operates over a state of the art broadband network, much more tangible benefit for our local clients rests in improving their access to the outside world through a stable local voicemail number. We serve and will continue to serve a substantial population of Washington residents for whom we are the de facto lifeline service, even as they attempt to transition to more traditional telecommunications services.

Thank you for this opportunity to comment.

Sincerely



Jennifer Brandon
Executive Director
Community Voice Mail National Office

² UT-090842, Joint Application of Verizon Communications Inc. and Frontier Communications Corporation for an Order Declining to Assert Jurisdiction Over, or, in the Alternative, Approving the Indirect Transfer of Control of Verizon Northwest Inc.

³ UT-050814, Joint Petition of Verizon Communications Inc., and MCI, Inc. for a Declaratory Order Disclaiming Jurisdiction Over or, in the Alternative a Joint Application, for Approval of Agreement and Plan of Merger

⁴ Joint Notice and Application for Expedited Approval of Proposed Merger, Arizona Docket T-01051B-10-0194, et al, filed 5/13/10



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Jennifer Brandon
Secretary
Seattle, WA

Re: Docket UT-100820, Joint application of Qwest Communications International Inc., and CenturyTel, Inc., for approval of indirect transfer of control of Qwest Corporation, Qwest Communications Company LLC, and Qwest LD Corp.

Debbi Lewang
Treasurer
Seattle, WA

Dear Chairman Goltz, Commissioners Jones and Oshie,

Maryel Duzan
At-Large Director
Seattle, WA

Thank you for the opportunity to submit comments on the proposed merger of CenturyLink and Qwest Communications in WA State. These comments are intended to supplement comments that we submitted in September (letter dated September 17, 2010) as well as the oral comments made at the public hearing the WUTC on Wednesday, January 5, 2011.

Gary Leaf
At-Large Director
Seattle, WA

As previously noted, Community Voice Mail (CVM) National is a non-profit organization headquartered in Washington State. CVM provides a free, personal voicemail number and information about jobs, community resources and health alerts to more than 43,000 extremely low-income people annually in 414 cities in 21 states.

KariNoir Mallory
Affiliate Director
Cleveland, OH

Our comments are submitted on behalf of the nearly 10,000 people who use our service in Washington State. We also speak on behalf of the nearly 400 human services agencies with whom we partner to magnify support services toward job security, housing, safety from domestic violence, benefits procurement, and legal counsel.

Lauren McGowan
At-Large Director
Seattle, WA

Given the current economic climate, increasing numbers of people are, for the first time in their lives, navigating the waters of the complicated human services system. These agencies are facing increased client loads with reduced staffing and devastating budget cuts. It is in this context that we consider this merger.

Jason Mitchell
At-Large Director
Los Angeles, CA

Lori Morton
Affiliate Director
Tulsa, OK

CVM understands the Commission applies a standard of review that the proposed merger must not harm consumers. In prior telecommunications mergers that it has approved, the

Bard Richmond
At-Large Director
Seattle, WA

Commission has imposed a myriad of conditions designed to achieve that goal, including public purpose funds¹ and other consumer protections.

The \$1.25M Verizon-MCI merger public purpose fund leveraged eight community projects that were successful in bringing telecommunication services, education, training and other benefits to a large number of low-income and underserved population in rural and urban areas. We believe this is a successful model for delivering services that should be replicated in this case.

CenturyLink and Quest state that the merger will “generate some \$625M in annual run-rate operating and capital synergies.”² We propose that a portion of the short-term savings and synergies be directed to a public purpose fund, similar to that established in the Verizon-MCI merger in 2005. The intention of the fund was stated in the order of that merger settlement; specifically, “Our intention is to use the fund for purposes that would mitigate merger effects, improve telecommunications services, make services more readily available to the public, or for other purposes benefiting a broad range of [Verizon] customers.”³

While competition may serve well those Washingtonians with access and who can afford a choice in telecommunications services, it unfortunately does not extend to the clients served by CVM and our partner agencies. And, although CVM’s service operates over a state of the art broadband network, we do not benefit from Lifeline nor broadband subsidies. We serve and will continue to serve a substantial population of Washington residents for whom we are the de facto lifeline service, even as they attempt to transition to more traditional telecommunications services.

Thank you for this opportunity to comment.

Sincerely

Jennifer Brandon
Executive Director
Community Voice Mail National Office

¹ UT-050814, Joint Petition of Verizon Communications Inc., and MCI, Inc. for a Declaratory Order Disclaiming Jurisdiction Over or, in the Alternative a Joint Application, for Approval of Agreement and Plan of Merger

² Joint Notice and Application for Expedited Approval of Proposed Merger, Arizona Docket T-01051B-10-0194, et al, filed 5/13/10

³ UT-050814, Order No. 07, Order accepting settlement on condition, page 71, paragraph 221