

**FCC Modernizing Unbundling and Resale Requirements Amendment  
to the Interconnection Agreement between  
United Telephone Company of the Northwest d/b/a CenturyLink  
and  
Comcast Phone of Washington, LLC d/b/a Comcast Digital Phone  
for the State of Washington**

This is an Amendment (“Amendment”) to the Interconnection Agreement between United Telephone Company of the Northwest d/b/a CenturyLink (“CenturyLink”), a Colorado corporation, and Comcast Phone of Washington, LLC d/b/a Comcast Digital Phone (“Comcast”). CenturyLink and Comcast shall be known jointly as the “Parties”.

**RECITALS**

WHEREAS, the Parties entered into an Interconnection Agreement (“Agreement”) for service in the state of Washington which was executed on August 16, 2016; and

WHEREAS, on October 28, 2020, the FCC released Order FCC 20-152, a Report and Order in WC Docket 19-308 for the Modernizing Unbundling and Resale Requirements in an Era of Next-Generation Networks and Services (“Order”), which became effective February 8, 2021 (“Effective Date of the Order”); and

WHEREAS, in order to implement the terms of the Order and consistent with the terms of the Agreement regarding changes in Applicable Law, the Parties desire to amend the Agreement further under the terms and conditions contained herein.

**AGREEMENT**

NOW THEREFORE, in consideration of the mutual terms, covenants and conditions contained in this Amendment and other good and valuable consideration, the receipt and sufficiency of which is hereby acknowledged, the Parties agree as follows:

**Amendment Terms**

The Agreement is hereby amended by adding terms and conditions to the Agreement for Unbundled Network Elements (UNEs) as set forth in Attachment 1 and Table 1 to this Amendment, attached hereto and incorporated herein by this reference. Any capitalized terms not defined specifically in this Amendment are as defined in the Agreement.

**Effective Date**

This Amendment shall be deemed effective upon approval by the Commission, or by being permitted to go into effect by operation of law; however, the Parties may agree to implement the provisions of this Amendment upon execution.

**Further Amendments**

Except as modified herein, the provisions of the Agreement shall remain in full force and effect. The provisions of this Amendment, including the provisions of this sentence, may not be amended, modified or supplemented, and waivers or consents to departures from the provisions of this Amendment may not be given without the written consent thereto by both Parties' authorized representative. No waiver by any Party of any default, misrepresentation, or breach

of warranty or covenant hereunder, whether intentional or not, will be deemed to extend to any prior or subsequent default, misrepresentation, or breach of warranty or covenant hereunder or affect in any way any rights arising by virtue of any prior or subsequent such occurrence.

**Entire Agreement**

The Agreement as amended (including the documents referred to herein) constitutes the full and entire understanding and agreement between the Parties with regard to the subjects of the Agreement as amended and supersedes any prior understandings, agreements, or representations by or between the Parties, written or oral, to the extent they relate in any way to the subjects of the Agreement as amended.

The Parties intending to be legally bound have executed this Amendment as of the dates set forth below, in multiple counterparts, each of which is deemed an original, but all of which shall constitute one and the same instrument.

**Comcast Phone of Washington, LLC d/b/a  
Comcast Digital Phone**

**United Telephone Company of the Northwest  
d/b/a CenturyLink**

DocuSigned by:

*Leslie Fein*

*Kimberly J. Povirk*

Kimberly J. Povirk (Jul 9, 2021 13:01 CDT)

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Signature

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Signature

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Leslie Fein

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Kimberly J. Povirk

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SVP Procurement

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Sr. Dir. Bus. Ops Wholesale Sales

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**ATTACHMENT 1****1. UNE Loops**

- a. **UNE DS1 and DS3 Loops.** CenturyLink is no longer required to offer UNE DS1 and DS3 loops in counties deemed competitive in the *BDS Order* (Order FCC 19-66, a Report and Order on Remand and Memorandum Opinion and Order in WC Docket Nos. 18-141, et al (the “UNE Transport Order”), corresponding to the associated Serving Wire Centers listed on the Wholesale website: <http://www.centurylink.com/wholesale/clecs/nta.html>, subject to the following transition periods during which CenturyLink will maintain the embedded base of UNE DS1 and DS3 loops and offer new UNE DS1 loops:
  - i. **UNE DS1**
    1. Comcast may submit new UNE DS1 orders through February 7, 2023 (“24-month new ordering period”).
    2. Comcast may retain its embedded base of UNE DS1 loops (including those ordered in the 24-month new ordering period) in these wire centers at TELRIC rates for 42 months from the Effective Date of the Order. After August 8, 2024, Comcast’s embedded base of UNE DS1 loops in these wire centers will be transitioned to market rates or offered under the applicable state tariff.
  - ii. **UNE DS3**
    1. Comcast may not submit new orders for UNE DS3 loops in these wire centers after February 8, 2021.
    2. Comcast may retain its embedded base of UNE DS3 loops at TELRIC rates in these wire centers for 36 months from the Effective Date of the Order. On Feb 8, 2024, Comcast’s embedded base of UNE DS3 loops in these wire centers will be transitioned to market rates or offered under the applicable state tariff.
- b. **UNE DS0 Loops and Associated Copper Subloops.** CenturyLink is no longer required to offer these UNEs in “urbanized area census blocks” (census blocks in areas with 50,000 or more people), corresponding to the associated Serving Wire Centers listed on the Wholesale website: <http://www.centurylink.com/wholesale/clecs/nta.html>, subject to the following transition periods during which CenturyLink will maintain the embedded base of these UNEs and offer new UNE DS0 loops:
  - i. **UNE DS0 Loops**
    1. Comcast may submit new orders for UNE DS0 loops in these wire centers through Feb 7, 2023 (“24-month new order period”).
    2. Comcast will retain current pricing for UNE DS0 loops and copper subloops in these wire centers until Feb 8, 2024 (including those ordered in the 24-month new order period). After Feb 8, 2024,

- CenturyLink may impose a 25% rate increase for any remaining UNE DS0 loops and copper subloops in these wire centers.
3. Comcast may retain its embedded base of these UNEs (including those ordered in the 24-month new order period) in these wire centers until February 8, 2025. After this date, CenturyLink will be entitled to charge market rates for these UNEs.
  4. This transition applies to digital copper loops and two-wire and four-wire copper loops conditioned to transmit digital signals.
- c. Miscellaneous UNE Narrowband Voice-Grade Loops. CenturyLink is no longer required to offer miscellaneous UNE voice-grade loops anywhere, subject to the following transition periods during which CenturyLink will maintain the embedded base of these UNEs:
- i. Comcast may not submit new orders for miscellaneous UNE voice-grade loops after February 8, 2021.
  - ii. Comcast may retain its embedded base of miscellaneous UNE voice-grade loops until Feb 8, 2024.
  - iii. "Miscellaneous UNE Narrowband Voice-Grade Loops" refer to 64 kbps voice grade channels over fiber loops where CenturyLink has retired copper (which are currently grandfathered) and to the TDM capabilities of hybrid loops.
2. MTE Premises UNE Subloops and NIDs. CenturyLink is not required to offer these UNEs anywhere, subject to the following transition periods during which CenturyLink will maintain the embedded base of these UNEs:
- a. New Orders. Comcast may not submit new orders for these UNEs after February 7, 2021.
  - b. Embedded Base. Comcast may retain its embedded base of these UNEs until February 8, 2024. After this date, CenturyLink will be entitled to charge market rates for these UNEs.
  - c. This applies to all NIDs and loop plants between the minimum point of entry at a multiunit premise and the point of demarcation.
3. UNE Dark Fiber Transport. CenturyLink is no longer required to offer UNE Dark Fiber transport on routes where the central office on each end of the route is either a Tier 1 or 2 wire center or within half mile of competitive fiber, subject to the following transition periods during which CenturyLink will maintain the embedded base of UNE Dark Fiber Transport without change in rates, terms or conditions:
- a. After February 8, 2021, Comcast may not submit new orders for UNE Dark Fiber Transport on these routes.
  - b. Comcast may retain its embedded base of UNE Dark Fiber Transport on these routes until February 8, 2029. After this date, CenturyLink will be entitled to charge market rates.
  - c. The central offices meeting the new test (*i.e.*, that are within a half mile of competitive fiber) are listed here: <http://www.centurylink.com/wholesale/clecs/nta.html> .

4. Operations Support Systems (OSS). CenturyLink is no longer required to offer OSS as an independent UNE nationwide, except where necessary to manage other UNEs, for interconnection, or for the local number port orders, subject to the transition periods that apply to the corresponding UNEs.

Table 1 - Rates

KEY CODES		Embarq - Washington		February 2021
MRC	NRC	ICA Elements		
		<b>UNE to Special Access or Special Access to UNE Conversions or Migrations (includes EEL) (*E)</b>	<b>MRC</b>	<b>NRC</b>
	I0018	DS1 Loop, per circuit		\$96.15
	I0019	DS1 Transport, per circuit		\$96.15
		DS3 Loop, per circuit		ICB
		DS3 Transport, per circuit		ICB
		<b>UNBUNDLED NETWORK ELEMENTS (UNE)</b>		
		<b>Stand Alone NID (*E)</b>	<b>MRC</b>	<b>NRC</b>
		2 Wire	\$1.25	
		4 Wire	\$2.50	
		Other NID Sizes	ICB	
		NID Outside Facilities Connection		ICB
		<b>Loops (Rates Include NID Charge) (*E)</b>	<b>MRC</b>	<b>NRC</b>
		<b>2-Wire xDSL - Capable Loop</b>		
	I0042	Band 1	\$24.78	
	I0043	Band 2	\$47.21	
	I0044	Band 3	\$62.85	
	I0045	Band 4	\$147.93	
	I0049	First Line		\$93.32
	I0050	Second Line and Each Additional Line (same time)		\$28.49
	I0051	Re-install (Cut Thru and Dedicated/Vacant)		\$42.59
	I0052	Disconnect		\$48.38
		<b>2-Wire Digital Loop</b>		
	I0064	Band 1	\$24.78	
	I0065	Band 2	\$47.21	
	I0066	Band 3	\$62.85	
	I0067	Band 4	\$147.93	
	I0071	First Line		\$93.32
	I0072	Second Line and Each Additional Line (same time)		\$28.49
	I0073	Disconnect		\$48.38
		<b>2-Wire ISDN-BRI Digital Loop</b>		
	I0074	Band 1	\$30.45	
	I0075	Band 2	\$65.78	
	I0076	Band 3	\$89.15	
	I0077	Band 4	\$248.54	
	I0081	First Line		\$93.32
	I0082	Second Line and Each Additional Line (same time)		\$28.49
	I0083	Disconnect		\$48.38
		<b>Digital 56k/64k Loop</b>		
	I0094	Band 1	\$33.87	
	I0095	Band 2	\$41.56	
	I0096	Band 3	\$111.04	
	I0097	Band 4	\$336.40	
	I0101	First Line		\$225.07
	I0102	Second Line and Each Additional Line (same time)		\$160.24
	I0103	Disconnect		\$48.38
		<b>DS1 Service</b>		
	I0104	Band 1	\$142.02	
	I0105	Band 2	\$162.01	
	I0106	Band 3	\$240.73	
	I0107	Band 4	\$521.70	
	I0111	First Line		\$310.08
	I0112	Second Line and Each Additional Line (same time)		\$245.93

Table 1 - Rates

KEY CODES		Embarq - Washington		February 2021
MRC	NRC	ICA Elements		
	I0113	Disconnect		\$48.38
		<b>DS3 Service</b>		
		Add DS3 to existing fiber system	ICB	\$123.44
		Disconnect		\$19.67
		<b>UNE Multiplexing (*E)</b>	MRC	NRC
		<b>Multiplexing elements are only relevant in conjunction with UNE transport.</b>		
I0136	I0137	Multiplexing - DS3-DS1 (per DS3)	\$192.83	\$89.86
		DS3-DS1 Disconnect		\$19.67
		<b>Unbundled Dark Fiber Transport (*E)</b>	MRC	NRC
		<b>Dark Fiber Application &amp; Quote Preparation Charge</b>		\$263.88
		Note: These elements are calculated and billed manually using one price per USOC and COS. Detail is provided by the DFA form returned to the customer.		
		<b>Transport</b>		
		Interoffice, per foot per fiber - Statewide Average	\$0.0270	
		<b>Additional Charges Applicable to Transport</b>		
		Fiber Patch Cord, per fiber	\$0.69	
		Fiber Patch Panel, per fiber	\$0.81	
		Central Office Interconnection, 1-4 Patch Cords per CO - Install or Disconnect		\$203.24
		Dark Fiber End-to-End Testing, Initial Strand		\$70.68
		Dark Fiber End-to-End Testing, Subsequent Strand		\$19.75

\*E The Federal Communications Commission ("FCC" or "Commission") released Order FCC 20-152 on October 28, 2020, a Report and Order in WC Docket 19-308 for the Modernizing Unbundling and Resale Requirements in an Era of Next-Generation Networks and Services ("Order"), which became effective February 8, 2021, and altered CenturyLink's obligations to provide certain unbundled network elements. As a result, any rate with this footnote attached to it only applies to UNE DS1, DS3 and DSO Loops, Subloops, Network Interface Device (NID), Dark Fiber and the applicable forbore OSS services according to the terms of this UNE Modernization Forbearance Amendment. Any rate with this footnote is no longer applicable after the following transition periods, consistent with the terms of the above referenced amendment: 1) DS1- new orders not available after February 8, 2023; 2) DS3- new orders not available as of the Effective Date of the Order; 3) DS0- new orders not available after February 8, 2023; 4) UNE Subloops and NIDs- new orders not available as of the Effective Date of the Order; 5) Dark Fiber Transport- new orders not available as of the Effective Date of the Order; and, 6) OSS- subject to the transition periods applicable to the corresponding UNEs. The wire center lists pertaining to this order can be found at: <http://www.centurylink.com/wholesale/clec.html>

Table 1 - Dedicated Transport

Dedicated Transport Price List							Embarq - Washington - February 2021		
<p><b>*C. UNE Forbearance.</b> The Federal Communications Commission (the, "FCC" or "Commission") released Order FCC 19-66, a Report and Order on Remand and Memorandum Opinion and Order in WC Docket Nos. 18-141, et al (the "UNE Transport Order"), and on August 2, 2019, released Order FCC 19-72, a Memorandum Opinion and Order in WC Docket 18-141 (the "UNE Analog Loop and Resale Forbearance Order") which altered CenturyLink's obligations to provide certain unbundled network elements. As a result, any rate with this footnote attached to it only applies to UNEs and Resold services according to the terms of the UNE/Resale Forbearance Amendment of the Agreement. Any rate with this footnote is no longer applicable in any way after August 2, 2022.</p>									
<p><b>*D.</b> The rates in this table apply solely to services ordered for UNE/Resale on or before February 2, 2020. Any new services for UNE/Resale incorrectly ordered after February 2, 2020 will not have the discounts or rates applicable in this table, but instead will be subject to the applicable tariff, price list or catalog rates.</p>									
<p><b>*E.</b> The Federal Communications Commission ("FCC" or "Commission") released Order FCC 20-152 on October 28, 2020, a Report and Order in WC Docket 19-308 for the Modernizing Unbundling and Resale Requirements in an Era of Next-Generation Networks and Services ("Order"), which became effective February 8, 2021, and altered CenturyLink's obligations to provide certain unbundled network elements. As a result, any rate with this footnote attached to it only applies to UNE DS1, DS3 and DSO Loops, Subloops, Network Interface Device (NID), Dark Fiber and the applicable forborne OSS services according to the terms of this UNE Modernization Forbearance Amendment. Any rate with this footnote is no longer applicable after the following transition periods, consistent with the terms of the above referenced amendment: 1) DS1- new orders not available after February 8, 2023; 2) DS3- new orders not available as of February 8, 2021; 3) DSO- new orders not available after February 8, 2023; 4) UNE Subloops and NIDs- new orders not available as of February 8, 2021; 5) Dark Fiber Transport- new orders not available as of February 8, 2021; and, 6) OSS- subject to the transition periods applicable to the corresponding UNEs. The wire center lists pertaining to this order can be found under "Reports" at: <a href="http://www.centurylink.com/wholesale/clec.html">http://www.centurylink.com/wholesale/clec.html</a>.</p>									
Key Codes		Route (CLI to CLI)			Route (Exchange to Exchange)		Non-Impaired Routes	Dedicated DS1 Rate	Dedicated DS3 Rate
DS1	DS3	Rate Band	Originating	Terminating	Originating	Terminating			
D0019	D1019	19	BRNNWAXRS0	CNTRWAXRS0	Brinnon	Chimacum		\$150.48	\$3,683.84
D0020	D1020	20	BRNNWAXRS0	QLCNWAXRS0	Brinnon	Quilcene		\$97.58	\$2,202.75
D0021	D1021	21	CNTRWAXRS0	QLCNWAXRS0	Chimacum	Quilcene	*C, *D, *E	\$90.97	\$2,017.61
D0048	D1048	48	DLPTWAACRS0	THDLORXADS0	Dallesport	The Dalles, OR		\$44.69	\$721.66
D0022	D1022	22	DLPTWAACRS0	WSHRWAXRS0	Dallesport	Wishram		\$104.20	\$2,387.88
D0028	D1028	28	GDVWAXRS0	PRSRWAXRS0	Grandview	Prosser	*C, *D, *E	\$84.36	\$1,832.47
D0027	D1027	27	GDVWAXRS0	SNSDWAXXDS0	Grandview	Sunnyside	*C, *D, *E	\$84.36	\$1,832.47
D0029	D1029	29	GDVWAXRS0	WHTSWAXRS0	Grandview	Whitstran		\$97.58	\$2,202.75
D0017	D1017	17	GLDLWAXRS0	HDRVORXRS0	Goldendale	Hood River, OR		\$262.88	\$6,831.16
D0025	D1025	25	GLDLWAXRS0	KLCTWAXRS0	Goldendale	Klickitat		\$137.26	\$3,313.57
D0033	D1033	33	GLDLWAXRS0	LYLEWAXRS0	Goldendale	Lyle		\$190.15	\$4,794.66
D0026	D1026	26	GLDLWAXRS0	RSVTWAXRS0	Goldendale	Roosevelt		\$229.82	\$5,905.47
D0068	D1068	68	GLDLWAXRS0	THDLORXADS0	Goldendale	The Dalles, OR		\$190.15	\$4,794.66
D0051	D1051	51	GLDLWAXRS0	WHSLWAXRS0	Goldendale	White Salmon		\$249.66	\$6,460.88
D0024	D1024	24	GLWDWAXRS0	WHSLWAXRS0	Glenwood	White Salmon		\$183.54	\$4,609.52
D0030	D1030	30	GRNGWAXRS0	SNSDWAXXDS0	Granger	Sunnyside		\$90.97	\$2,017.61
D0031	D1031	31	GRNGWAXRS0	TPNSWAXRS0	Granger	Toppenish		\$77.75	\$1,647.34
D0032	D1032	32	GRNGWAXRS0	ZLLHWAXRS0	Granger	Zillah		\$71.14	\$1,462.20
D0069	D1069	69	HDRVORXRS0	STSNWAXRS0	Hood River, OR	Stevenson		\$150.48	\$3,683.84
D0052	D1052	52	HDRVORXRS0	WHSLWAXRS0	Hood River, OR	White Salmon		\$51.30	\$906.79
D0073	D1073	73	LYLEWAXRS0	THDLORXADS0	Lyle	The Dalles, OR		\$84.36	\$1,832.47
D0004	D1004	4	LYLEWAXRS0	WHSLWAXRS0	Lyle	White Salmon	*C, *D, *E	\$104.20	\$2,387.88
D0034	D1034	34	MBTNWAXRS0	SNSDWAXXDS0	Mabton	Sunnyside	*C, *D, *E	\$84.36	\$1,832.47
D0040	D1040	40	PRSRWAXRS0	SNSDWAXXDS0	Prosser	Sunnyside	*C, *D, *E	\$130.64	\$3,128.43
D0035	D1035	35	PRSRWAXRS0	WHTSWAXRS0	Prosser	Whitstran		\$57.91	\$1,091.93
D0039	D1039	39	RSVTWAXRS0	THDLORXADS0	Roosevelt	The Dalles, OR		\$348.84	\$9,237.93
D0018	D1018	18	STSNWAXRS0	WHSLWAXRS0	Stevenson	White Salmon	*C, *D, *E	\$163.70	\$4,054.11
D0054	D1054	54	THDLORXADS0	WHSLWAXRS0	The Dalles, OR	White Salmon		\$143.87	\$3,498.70
D0050	D1050	50	THDLORXADS0	WSHRWAXRS0	The Dalles, OR	Wishram		\$110.81	\$2,573.02
D0036	D1036	36	TPNSWAXRS0	ZLLHWAXRS0	Toppenish	Zillah	*C, *D, *E	\$57.91	\$1,091.93
D0010	D1010	10	TRLKWAXRS0	WHSLWAXRS0	Trout Lake	White Salmon		\$150.48	\$3,683.84
D0037	D1037	37	WHSLWAXRS0	WLRDWAXRS0	White Salmon	Willard		\$84.36	\$1,832.47