

**Exh. SB-26  
Docket UT-240029  
Witness: Sean Bennett**

**BEFORE THE WASHINGTON  
UTILITIES AND TRANSPORTATION COMMISSION**

**In the Matter of the Petition of the**

**DOCKET UT-240029**

**QWEST CORPORATION;  
CENTURYTEL OF WASHINGTON;  
CENTURYTEL OF INTERISLAND;  
CENTURYTEL OF COWICHE; AND  
UNITED TELEPHONE COMPANY OF  
THE NORTHWEST**

**to be Competitively Classified Pursuant  
to RCW 80.36.320**

**EXHIBIT TO TESTIMONY OF**

**SEAN BENNETT**

**STAFF OF  
WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION**

*HHI Analysis Summary*

**April 3, 2024**

### Fixed POTS and VoIP HHI Comparison

Summary HHI - Calculated using all Providers		
County	HHI	HHI Groups
Adams	3000	Highly Concentrated
Asotin	1700	Moderately Concentrated
Benton	2400	Moderately Concentrated
Chelan	1900	Moderately Concentrated
Clallam	3000	Highly Concentrated
Clark	2400	Moderately Concentrated
Columbia	3000	Highly Concentrated
Cowlitz	2400	Moderately Concentrated
Douglas	2100	Moderately Concentrated
Ferry	3000	Highly Concentrated
Franklin	2300	Moderately Concentrated
Garfield	3000	Highly Concentrated
Grant	1400	Unconcentrated
Grays Harbor	3000	Highly Concentrated
Island	2200	Moderately Concentrated
Jefferson	3000	Highly Concentrated
King	1100	Unconcentrated
Kitsap	3000	Highly Concentrated
Kittitas	3000	Highly Concentrated
Klickitat	3000	Highly Concentrated
Lewis	2300	Moderately Concentrated
Lincoln	3000	Highly Concentrated
Mason	2300	Moderately Concentrated
Okanogan	2200	Moderately Concentrated
Pacific	2500	Highly Concentrated
Pend Oreille	3000	Highly Concentrated
Pierce	2900	Highly Concentrated
San Juan	3000	Highly Concentrated
Skagit	2700	Highly Concentrated
Skamania	3000	Highly Concentrated
Snohomish	2500	Highly Concentrated
Spokane	2000	Moderately Concentrated
Stevens	3000	Highly Concentrated
Thurston	2800	Highly Concentrated
Wahkiakum	3000	Highly Concentrated
Walla Walla	2600	Highly Concentrated
Whatcom	2400	Moderately Concentrated
Whitman	2200	Moderately Concentrated
Yakima	2100	Moderately Concentrated
State Wide HHI	1300	Unconcentrated

Concentration Level	Number of Counties
Highly Concentrated	22
Moderately Concentrated	15
Unconcentrated	2
Total	39

Summary HHI - Calculated using all Holding Companies (Affiliates Grouped together)		
HHI	HHI Groups	
3000	Highly Concentrated	
1800	Moderately Concentrated	
2500	Highly Concentrated	
1900	Moderately Concentrated	
3000	Highly Concentrated	
2500	Highly Concentrated	
3000	Highly Concentrated	
2500	Highly Concentrated	
2100	Moderately Concentrated	
3000	Highly Concentrated	
2500	Highly Concentrated	
3000	Highly Concentrated	
1500	Moderately Concentrated	
3000	Highly Concentrated	
2200	Moderately Concentrated	
3000	Highly Concentrated	
1700	Moderately Concentrated	
3000	Highly Concentrated	
3000	Highly Concentrated	
3000	Highly Concentrated	
2400	Moderately Concentrated	
3000	Highly Concentrated	
2300	Moderately Concentrated	
2700	Highly Concentrated	
2600	Highly Concentrated	
3000	Highly Concentrated	
3000	Highly Concentrated	
3000	Highly Concentrated	
2700	Highly Concentrated	
3000	Highly Concentrated	
2500	Highly Concentrated	
2400	Moderately Concentrated	
3000	Highly Concentrated	
3000	Highly Concentrated	
3000	Highly Concentrated	
2800	Highly Concentrated	
2400	Moderately Concentrated	
2200	Moderately Concentrated	
2600	Highly Concentrated	
1600	Moderately Concentrated	

Concentration Level	Number of Counties
Highly Concentrated	28
Moderately Concentrated	11
Unconcentrated	0
Total	39