

**Exh. SB-17
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**

CenturyLink's Response to UTC Staff DR. No. 34

April 3, 2024

UTC STAFF DATA REQUEST NO. 34:

Please list the data sources (URLs when appropriate) and explain the methodology that Mr. Gose used to aggregate location counts to wire centers.

RESPONSE:

The data sources for the locations displayed in Exhibit PJG-2C include publicly available BDC data (Data Download - By State | FCC National Broadband Map; <https://broadbandmap.fcc.gov/data-download/nationwide-data?version=jun2023>), hex-8 shapefiles (for all competitors other than CMRS) and hex 9 shapefiles (for CMRS households). Note that hex-8 and hex-9 shapefiles are found at the same source (H3 Hexagon GIS Data | Powered by Box: <https://us-fcc.app.box.com/s/743307kjdy8yptlyto5wpgf2bp3wesyy>).

A table was generated associating each H3 hexagon (index 8) to a wire center. Using software with GIS functionality, the centroid for each hexagon was calculated. The same GIS software compared each hexagon's centroid to Lumen's ILEC wire center GIS boundaries. Each hexagon where the centroid was within a wire center boundary was associated with that wire center. Hexagons whose centroids did not fall within a wire center boundary were not associated with any Lumen ILEC wire center.

The publicly available location data includes the hex-8 designation for each location. It also includes each provider by technology with service available. For a given technology, (e.g., fiber) or group of technologies (e.g., fixed) the count of locations for each provider was calculated for each hexagon and then aggregated by wire center using the above referenced table. This produced the locations with service available for each provider.

Separately, a count of locations for each hexagon was calculated if service was available from any provider using the specified technology or group of technologies. This count was also aggregated by wire center using the table created to cross-reference the hex-8 hexagon to Lumen ILEC wire center.

BDC service from Lumen or any of its affiliates was excluded from this analysis.

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