

**Exh. SB-27  
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 Response to UTC Staff DR No. 21*

**April 3, 2024**

### **UTC STAFF DATA REQUEST NO. 21:**

RCW 80.36.300(1) declares it is the policy of the state to preserve affordable universal telecommunications service.

- a. Please provide a narrative explanation of CenturyLink’s position on how its petition advances the state goal of “preserv[ing] affordable universal telecommunications service.”
- b. Please provide a narrative explanation of CenturyLink position on the definition of “affordable” and explain why it holds that position?
- c. Please provide any proceedings, citations, sources, methodology used for the explanations provided above in a. and b. above.

Staff Data Request Nos. 22-47 relate directly to the competition study attached as Exhibit 1 to the Declaration of Peter J. Gose (*please also contact Sean Bennett for 22-47 below*).

### **RESPONSE:**

CenturyLink objects to this question to the extent it seeks a legal opinion. Without waiving its objections, CenturyLink responds as follows.

- a. The same statute also declares that it is the policy of the state to “(5) Promote diversity in the supply of telecommunications services and products in telecommunications markets throughout the state; and (6) Permit flexible regulation of competitive telecommunications companies and services.” CenturyLink provides only a small percentage of the voice connections in the state of Washington, has been treated as if competitively classified under its 2014 AFOR and is not rate regulated today. Granting of the petition will not degrade “affordable universal telecommunications service.” Competitive classification largely maintains the status quo (as set by the 2014 AFOR), except principally that (while revocable by the Commission) it does not require renegotiation and re-litigation every few years.
- b. Merriam-Webster defines “affordable” as able to be afforded; having a cost that is not too high.” What is “affordable” to one customer may be “unaffordable” to another. As applies to telecommunications services in Washington, the clearest barometer of affordability is customer choice, in other words how customers have voted with their feet and wallets. In Washington, 78.9% of voice connections are provided by mobile wireless (CMRS) providers, and all but 3.9% of voice connections are provided by alternatives to the CenturyLink ILECs. That would indicate that each of these alternatives to CenturyLink is considered to be affordable by Washington customers.
- c. See <https://www.merriam-webster.com/dictionary/affordable>. Also see the data, statistics, tables and graphics identified and underlying the petition and Exhibit PJG-1T.

**Respondent:** CenturyLink Legal