

**Exh. SB-6
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. 29

April 3, 2024

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UTC STAFF DATA REQUEST NO. 29:

Did Mr. Gose take internet download and upload speed into account in analyzing the competition CenturyLink faces? Please provide a narrative response describing CenturyLink's position on whether a location is "served" if available broadband speeds: (1) meet the FCC's broadband definition of 25/3 Mbps, or (2) meet the Washington State Legislature's definition of 100/20 Mbps.

RESPONSE:

As an initial matter, this question conflates FCC standards for *broadband* usage and *voice* usage. This proceeding considers whether the CenturyLink ILECs are subject to effective competition for their regulated voice services in Washington. That said, no, CenturyLink did not exclude or categorize providers based upon the FCC download definition provided above. The BDC data has a minimum upload or download speed of at least 200 KB/s for a location to qualify as "served" by a provider. CenturyLink believes that voice service would be supported at any "served" location.

Respondent: Peter Gose, Director State and Local Government Affairs
(peter.gose@lumen.com; 303-324-5678)
Jacob Barlow, Government Operations Manager
(Jacob.barlow@lumen.com; 303-707-7004)