

Maintenance Expense Reporting for 2017 - 2019
As Compared to 2014 - 2016 Expense Per Average
Access Line by Washington ILEC

Ln #	Maintenance Expense by Company (A)	2014	2015	2016	3 Year Average	Company Input		
						2017	2018	2019
1	CenturyTel of Washington, Inc.							
2	CenturyTel of Inter-Island Inc.							
3	CenturyTel of Cowiche, Inc.							
4	United Telephone Co. of the Northwest (WA)							
5	Qwest Corporation (Washington)							
6	Total						\$ -	\$ -
	Access Line by Company (B)	2014	2015	2016	3 Year Average	Company Input		
						2017	2018	2019
7	CenturyTel of Washington, Inc.							
8	CenturyTel of Inter-Island Inc.							
9	CenturyTel of Cowiche, Inc.							
10	United Telephone Co. of the Northwest (WA)							
11	Qwest Corporation (Washington)							
12	Total						-	-
	Average Maintenance Expense Per Access Line	2014	2015	2016	3 Year Average	2017 Maintenance Expense/Access Line by Company (C)		
							2018	2019
13	CenturyTel of Washington, Inc. (Lns 1/7)						#DIV/0!	#DIV/0!
14	CenturyTel of Inter-Island Inc. (Lns2/8)						#DIV/0!	#DIV/0!
15	CenturyTel of Cowiche, Inc. (Lns 3/9)						#DIV/0!	#DIV/0!
16	United Telephone Co. of the NW (WA) (Lns 4/10)						#DIV/0!	#DIV/0!
17	Qwest Corporation (Washington) (Lns 5/11)						#DIV/0!	#DIV/0!

(A) Maintenance Expense for this calculation is defined as Plant Specific Operations Expense which FCC Part 32 defines as Accounts 6112 to 6441 for Class A Companies.

If the FCC changes to allow Class A companies to use Class B reporting, Accounts are 6110 to 6410.

If the FCC discontinues the use of Part 32 accounts, CenturyLink will provide maintenance expense information using the format it uses to account for such activity.

(B) If the methodology used in 2014 - 2016 for reporting access lines changes for 2017 - 2019, Staff must be notified of this change and the impact.

(C) Annual average maintenance expense is company specific and calculated by dividing annual maintenance expense (reported in lines 1-5) by by end-of-year access lines (reported on lines 7-11). The result for 2017 - 2019, lines 13 - 17, is compared to the 3 Year Average on lines 13 -17.

The 2017 maintenance expense per access line was greater than the 3-year average for each company except Cowiche. For Cowiche, the expense per line was less than the 3-year average but was greater than in 2016. For a small company such as Cowiche with a small number of lines, changes to the average can be driven by relatively small events or issues.

Further, CenturyLink reviewed the trouble reports for Cowiche for 2017 and has confirmed that for each month in 2017 the company met the standard in WAC 480-120-438 that trouble reports by central office must not exceed four trouble reports per one hundred access lines per month for two consecutive months, or per month for four months in any one twelve-month period. This confirms that the lower maintenance expense did not result in excess trouble reports, and suggests that maintenance expense might have been lower simply because there were a small number of maintenance issues in 2017.

REDACTED

DESIGNATED INFORMATION IS CONFIDENTIAL PURSUANT TO PROTECTIVE ORDER IN DOCKET UT-170042