

**Exh. SB-9  
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. 18*

**April 3, 2024**

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**UTC STAFF DATA REQUEST NO. 18:**

The Washington State Legislature has found that access to broadband is critical to full participation in society and the modern economy and that increasing broadband service is a fundamental governmental purpose and function and provides a public benefit to the citizens of Washington by enabling access to health care, education, and essential services, providing economic opportunities, and enhancing public health and safety. The legislature defines broadband as 100/20 Mbps. CenturyLink appears to have included all companies in its competition study in Exhibit 1 to the Declaration of Peter Gose, regardless of whether the internet speeds offered by those companies satisfies the Legislature's definition of broadband. Please explain why CenturyLink considered services involving broadband speeds that might not allow Washingtonians to simultaneously and fully participate in household needs, see Federal Communication's Commission, Broadband Speed Guide, available at <https://www.fcc.gov/consumers/guides/broadband-speed-guide>, as reasonably available alternative.

**RESPONSE:**

This data request conflates the sufficiency of broadband speeds for use of the internet and competition for CenturyLink voice services. CenturyLink's 1FR and 1FB do not provide customers any standalone broadband functionality, and thus any suggestion that a service cannot be considered a competitor to the 1FR/1FB unless it provides at least 100/20 Mbps broadband is misguided.

This proceeding concerns whether the CenturyLink ILECs are subject to effective competition for voice services in their Washington service territories. The Commission does not regulate broadband/internet services. The Commission must consider as a competitor to CenturyLink any provider (regardless of technology) that can provide a customer a connection that permits a voice service that is a functionally equivalent or substitute service readily available at competitive rates, terms, and conditions. Broadband speeds of 500 Kbps or less are all that is needed to facilitate voice service.

**Respondent:** CenturyLink Legal