

**Exh. SB-14  
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**

*DOR Voice Counts*

**April 3, 2024**

**From:** [Bennett, Sean \(UTC\)](#)  
**To:** [Church, Jonathon \(UTC\)](#)  
**Subject:** FW: Current Voice Lines (wired, cellular, and VoIP)  
**Date:** Wednesday, March 27, 2024 9:24:55 AM  
**Attachments:** [image001.png](#)

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**From:** Torres, Valerie (DOR) <ValerieT@DOR.WA.GOV>  
**Sent:** Wednesday, March 20, 2024 10:47 AM  
**To:** Bennett, Sean (UTC) <sean.bennett@utc.wa.gov>  
**Cc:** Church, Jonathon (UTC) <jonathon.church@utc.wa.gov>  
**Subject:** RE: Current Voice Lines (wired, cellular, and VoIP)

Sean -

That is correct, and that is why we were able to share this information with you without a data-sharing agreement.

Please ensure everyone understands we estimate these numbers because businesses report lines monthly, so we average the reporting over the year.

***Valerie Torres***

*Pronouns: she/her*

Program Manager, Research & Fiscal Analysis  
360-534-1521 | [ValerieT@dor.wa.gov](mailto:ValerieT@dor.wa.gov)  
Washington State Department of Revenue | [dor.wa.gov](http://dor.wa.gov)

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**From:** Bennett, Sean (UTC) <[sean.bennett@utc.wa.gov](mailto:sean.bennett@utc.wa.gov)>  
**Sent:** Wednesday, March 20, 2024 10:36 AM  
**To:** Torres, Valerie (DOR) <[ValerieT@DOR.WA.GOV](mailto:ValerieT@DOR.WA.GOV)>  
**Cc:** Church, Jonathon (UTC) <[jonathon.church@utc.wa.gov](mailto:jonathon.church@utc.wa.gov)>  
**Subject:** FW: Current Voice Lines (wired, cellular, and VoIP)

Hi Valerie – It is my understanding that this information is not confidential, and we would be able to share this data publicly within a proceeding since this type of information was previously provided within a fiscal note. Can you confirm this?

Thank you so much!

Thanks,

Sean Bennett

(he/him)  
Acting Section Manager | Telecommunications - Regulatory Services  
Utilities and Transportation Commission  
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Lacey, WA 98503  
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Respect, Professionalism, Integrity, Accountability



This email states the informal opinions of commission staff, offered as technical assistance, and are not intended as legal advice. We reserve the right to amend these opinions should circumstances change or additional information be brought to our attention. Staff's opinions are not binding on the commission.

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**From:** Torres, Valerie (DOR) <[ValerieT@DOR.WA.GOV](mailto:ValerieT@DOR.WA.GOV)>  
**Sent:** Monday, October 30, 2023 8:54 AM  
**To:** Bennett, Sean (UTC) <[sean.bennett@utc.wa.gov](mailto:sean.bennett@utc.wa.gov)>  
**Subject:** RE: Current Voice Lines (wired, cellular, and VoIP)

Sean –

The Local 911 data we have was the best source for the number of lines; however, we do have to 'estimate' the number of lines because taxpayers report the information monthly, and each line is thus potentially reported 12 times in a year. So, in the attached spreadsheet, the number of lines is the total reported lines divided by 12 and rounded to the nearest 10. We also included the number of taxpayers; however, taxpayers report for multiple counties, so the taxpayer count cannot be summed together.

I hope this helps with your analysis; please let me know if you have any questions.

**Valerie Torres**

*Pronouns: she/her*

Program Manager, Research & Fiscal Analysis  
360-534-1521 | [ValerieT@dor.wa.gov](mailto:ValerieT@dor.wa.gov)  
Washington State Department of Revenue | [dor.wa.gov](http://dor.wa.gov)

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**From:** Bennett, Sean (UTC) <[sean.bennett@utc.wa.gov](mailto:sean.bennett@utc.wa.gov)>  
**Sent:** Tuesday, October 24, 2023 2:22 PM  
**To:** Valz, Erin (DOR) <[ErinV@DOR.WA.GOV](mailto:ErinV@DOR.WA.GOV)>  
**Subject:** Current Voice Lines (wired, cellular, and VoIP)

Hi Erin – As we discussed, DOR completed a fiscal note (link below, pages 11 and 12) for [HB 1460](#) in which it estimated the number of wired, cellular, and VoIP lines. We are looking at completing a Herfindahl Index to measure voice competition at a county basis (or any other geographic boundary you have this data for) and it is our hope that DOR has the data necessary for this analysis. We're aware that this information may be confidential, depending on the level of granularity, and would like to work with you to ensure that confidential information is adequately protected.

As for a timeline, it would be great to know if it exists at a county basis by October 31 and then if it could be provided by November 7.

<https://fnspublic.ofm.wa.gov/FNSPublicSearch/GetPDF?packageID=62257>

Any help you can provide would be greatly appreciated and let me know if you have any questions.

Best regards,

Sean Bennett

(he/him)

Senior Regulatory Analyst

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Respect, Professionalism, Integrity, Accountability



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**Local 911 - Phone Line Reporting by Type**  
**Calendar Year 2022**

County Name	Taxpayer Count	Wired Lines	Taxpayer Count	Wireless Lines	Taxpayer Count	VoIP Lines
ADAMS COUNTY	17	1,990	18	13,900	40	1,230
ASOTIN COUNTY	19	1,930	22	15,470	42	1,750
BENTON COUNTY	33	11,670	30	167,730	98	28,110
CHELAN COUNTY	21	10,270	26	62,190	61	9,240
CLALLAM COUNTY	24	10,950	28	54,950	57	8,750
CLARK COUNTY	41	34,750	35	422,720	122	93,560
COLUMBIA COUNTY	11	860	18	2,980	22	160
COWLITZ COUNTY	33	10,580	31	88,250	82	14,920
DOUGLAS COUNTY	18	2,390	25	30,130	50	6,650
FERRY COUNTY	9	1,920	19	4,250	16	160
FRANKLIN COUNTY	26	4,300	27	70,670	57	10,030
GARFIELD COUNTY	10	450	17	1,700	15	110
GRANT COUNTY	27	9,880	28	72,700	65	8,320
GRAYS HARBOR COUNTY	25	6,590	26	53,690	62	10,900
ISLAND COUNTY	20	10,740	24	75,160	61	11,010
JEFFERSON COUNTY	19	4,760	23	25,910	48	3,810
KING COUNTY	53	215,480	39	2,187,870	174	504,460
KITSAP COUNTY	35	21,580	32	228,860	89	36,390
KITTITAS COUNTY	18	6,650	25	34,470	47	3,140
KLICKITAT COUNTY	13	3,530	25	17,240	41	1,620
LEWIS COUNTY	34	13,740	30	62,410	72	8,230
LINCOLN COUNTY	9	2,380	20	9,590	30	300
MASON COUNTY	26	9,380	28	47,950	46	6,110
OKANOGAN COUNTY	19	6,510	23	25,640	46	3,700
PACIFIC COUNTY	14	3,510	23	18,040	31	3,620
PEND OREILLE COUNTY	9	2,770	20	9,820	22	640
PIERCE COUNTY	49	53,900	37	793,530	123	156,860
SAN JUAN COUNTY	11	5,950	21	16,890	36	1,820
SKAGIT COUNTY	26	11,780	28	112,040	79	19,440
SKAMANIA COUNTY	7	2,380	19	8,570	30	420
SNOHOMISH COUNTY	41	58,350	35	758,350	117	122,760
SPOKANE COUNTY	44	43,480	35	425,990	121	82,760
STEVENS COUNTY	19	7,040	30	32,550	48	3,120
THURSTON COUNTY	36	25,300	35	273,710	98	51,810
WAHKIAKUM COUNTY	8	950	15	3,410	16	310
WALLA WALLA COUNTY	28	4,270	30	44,020	71	7,830
WHATCOM COUNTY	34	16,810	33	182,970	92	39,240
WHITMAN COUNTY	21	4,640	25	27,160	48	3,810
YAKIMA COUNTY	36	18,280	31	190,520	74	30,140
<b>Totals:</b>		662,690		6,674,000		1,297,240