

**BEFORE THE WASHINGTON
UTILITIES & TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,

Complainant,

v.

THE CENTRUYLINK COMPANIES - QWEST CORPORATION; CENTURYTEL OF
WASHINGTON; CENTURYTEL OF INTERISLAND; CENTURYTEL OF
COWICHE; AND UNITED TELEPHONE COMPANY OF THE NORTHWEST

Respondent.

DOCKET UT-240029

**DAVID BREVITZ, C.F.A.
ON BEHALF OF THE
WASHINGTON STATE OFFICE OF THE ATTORNEY GENERAL
PUBLIC COUNSEL UNIT**

EXHIBIT DB-3

CenturyLink's Response to UTC Staff Data Request No. 1-47(R)

April 3, 2024

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Lumen, by and through its undersigned counsel hereby objects and responds to UTC Staff Data Request Nos 1-47:

GENERAL OBJECTIONS

Lumen incorporates the following general objections into each individual data request response below:

1. Lumen objects to each data request to the extent that it seeks or purports to seek information protected by any applicable privilege or immunity, including the attorney-client privilege and work-product doctrine. Any inadvertent production of privileged or work-product protected material is not a waiver of the status of such work product, nor is any response herein to be deemed a waiver of any privilege, doctrine, or immunity.
2. Lumen objects to any data request or instruction that purports to require more than is required by the applicable rules of the Commission.
3. Lumen objects generally to each data request to the extent (i) that the information requested is known to UTC Staff or their counsel; (ii) the request requires disclosure of information, documents, writings, records, or publications in the public domain; or (iii) the information requested is equally available to UTC Staff or their counsel from sources other than Lumen.
4. Lumen objects to each data request to the extent that it is overly broad, vague and ambiguous, unduly burdensome, and calling for information that is irrelevant or not proportional to the needs of the case.
5. These responses are provided on the basis of the best information currently available to Lumen after diligent effort to gather such information within its possession, custody or control. Lumen reserves the right to amend these responses as new information is gathered.

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RESPONSES TO DATA REQUESTS

UTC STAFF DATA REQUEST NO. 1:

Please provide copies of all data requests submitted to you by any party to this proceeding and your corresponding responses to those requests.

RESPONSE:

CenturyLink will do so.

Respondent: CenturyLink Legal

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UTC STAFF DATA REQUEST NO. 2:

Please provide the name of CenturyLink's a) holding company, b) parent companies, and c) all affiliated companies that provide services (both regulated and non-regulated) in the state of Washington as of December 31, 2023.

RESPONSE:

Qwest Corporation: [REDACTED] parent is Qwest Services Corporation, whose parent is Qwest Communications International Inc., whose parent is Lumen Technologies, Inc. (ultimate parent)

CenturyTel of Cowiche: [REDACTED]

CenturyTel of Inter Island, Inc: [REDACTED]

CenturyTel of Washington, Inc.: [REDACTED]

United Telephone Company of the Northwest: [REDACTED]

Other Washington provider affiliates: Broadwing Communications, LLC; CenturyLink Communications, LLC; Q Fiber, LLC; Global Crossing Local Services, Inc.; Global Crossing Telecommunications, Inc.; Level 3 Communications, LLC; Level 3 Telecom of Washington, LLC; and WilTel Communications, LLC.

Respondent: CenturyLink Legal

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UTC STAFF DATA REQUEST NO. 3:

Please explain if CenturyLink Communications, LLC (also a LUMEN affiliate) is an alleged “competitor” in any of the Ziplly Fiber wire centers in the state of Washington; and if so, please provide a list of such wire centers.

RESPONSE:

CenturyLink objects to this data request on the grounds that it is not reasonably calculated to lead to the discovery of admissible evidence. CenturyLink’s petition and this proceeding concern whether the CenturyLink ILECs are subject to effective competition (pursuant to RCW 80.36.320) within the CenturyLink ILECs’ service territories. It does not in any way relate to Ziplly wire centers. CenturyLink further objects on the basis that the use of the phrase “is an alleged ‘competitor’ in any” is vague and ambiguous. Without waiving its objections, CenturyLink responds as follows.

CenturyLink Communications, LLC (“CLC”) has statewide authority to provide services as an interexchange competitor (“IXC”) and competitive local exchange carrier (“CLEC”) (see Docket UT-940120).

CLC is not a mass market competitor for local voice service in Ziplly territory in Washington. For enterprise customers, CLC provides VoIP application/service to customers in Ziplly territory. CLC currently provides VoIP service to customers in the following Ziplly wire centers:

[REDACTED]

Respondent: Jacob Barlow, Government Operations Manager
(Jacob.barlow@lumen.com; 303-707-7004)

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UTC STAFF DATA REQUEST NO. 4:

Please explain if Quantum Fiber (also a LUMEN affiliate) is an alleged “competitor” in any of the Ziplly Fiber wire centers in the state of Washington; and if so, please provide a list of such wire centers.

RESPONSE:

CenturyLink objects to this data request on the grounds that it is not reasonably calculated to lead to the discovery of admissible evidence. CenturyLink’s petition and this proceeding concern whether the CenturyLink ILECs are subject to effective competition (pursuant to RCW 80.36.320) within the CenturyLink ILECs’ service territories. It does not in any way relate to Ziplly wire centers. CenturyLink further objects on the basis that the use of the phrase “is an alleged ‘competitor’ ...” is vague and ambiguous. Without waiving its objections, CenturyLink responds as follows.

Quantum Fiber, [REDACTED], does not operate in Ziplly wire centers in Washington. Quantum Fiber primarily, if not exclusively, provides service in CenturyLink ILEC territory in Washington.

Respondent: CenturyLink Legal
Peter Gose, Director State and Local Government Affairs
(peter.gose@lumen.com; 303-324-5678)

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UTC STAFF DATA REQUEST NO. 5:

At tab “All Fixed Providers” of the spreadsheet provided in Exhibit 1 to the Declaration of Peter Gose, CenturyLink provides the total locations in column F and the total served in column G. Would the CenturyLink agree that the locations served by each of the competitors listed in columns H-CK are not “served” but rather “serviceable”? If so, does CenturyLink also agree that it does not know the number of locations served by each of the competitors in any of the wire centers listed in column D?

RESPONSE:

It is not entirely clear what Staff means by “served” as opposed to “serviceable.” In Exhibit 1 to Gose Declaration (same as Exhibit PJG-2C), CenturyLink has identified the number of locations potentially or actually reached by each provider. This data comes from the FCC’s most current Broadband Data Collection information (June 30, 2023). CenturyLink does not claim that any provider actually serves all customers its technology could today serve, nor is it determinative which alternative provider each customer in a CenturyLink wire center currently takes service from. RCW 80.36.320 requires evidence of “effective competition” and explains that “[e]ffective competition means that the company's customers **have reasonably available alternatives** and that the company does not have a significant captive customer base.” (emphasis added)

Respondent: CenturyLink Legal
Peter Gose, Director State and Local Government Affairs
(peter.gose@lumen.com; 303-324-5678)

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UTC STAFF DATA REQUEST NO. 6:

At tab “All Fixed Providers” of the spreadsheet provided in Exhibit 1 to the Declaration of Peter Gose, the sum of locations is 1,760,796.

- a. Is it CenturyLink’s position that 100 percent of these locations are “served” and customers subscribe to at least one provider, whether it be CenturyLink or a competitor?
- b. What is the total number of units served at the locations identified?
- c. How many locations, by wire center, does each of the CenturyLink ILECs actually serve?
- d. How many locations, by wire center, does each of CenturyLink’s non-ILEC affiliates actually serve?
- e. Please provide a new spreadsheet that contains columns A-G, then with additional columns for each individual entity identified in c. and d., above, by wirecenter.

REQUESTED BY: Rebecca Beaton**RESPONSE:**

- a. Staff’s use of ‘served’ is not clear from the question. See CenturyLink’s response to Staff Data Request 5. It is CenturyLink’s position, based on the FCC’s BDC data, that alternative providers are able to provide service to the number of locations displayed in Column G. Those numbers are disaggregated by specific serving technology in the following tabs in Exhibit PJG-2C.
- b. CenturyLink does not understand the question as written. “Served” in Column G refers to the number of locations in the CenturyLink wire center that alternative providers (of varying technologies) are able to provide service to. Those numbers are disaggregated by specific serving technology in the following tabs in Exhibit PJG-2C.
- c. See tab “WA Household Data” in Exhibit PJG-2C
- d. See Exhibit Staff 6d(C), which separately identifies CenturyLink Communications, LLC and Level 3 (all Level 3 affiliates aggregated) customer counts by CenturyLink wire center. The exhibits contain data for voice and VoIP services, both for June 30, 2023 (same vintage as data in Exhibit PJG-2C) and December 31, 2023.
- e. CenturyLink objects to this data request on the basis that it requires a special study. The information requested is contained in the responses to subparts c and d.

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)

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UTC STAFF DATA REQUEST NO. 7:

Please provide a narrative explanation of which elements, including tariff components and sections, of their services that CenturyLink intends will remain in “obligation” and thus unaffected by CenturyLink’s petition for competitive classification.

RESPONSE:

CenturyLink does not intend to change its current Washington tariff as a result of being granted competitive classification. See CenturyLink Tariff No. 49:

https://www.centurylink.com/content/dam/home/about-us/tariff/documents/wa_qc_ens_t_no_49.pdf

Respondent: CenturyLink Legal

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UTC STAFF DATA REQUEST NO. 8:

Please provide a narrative explanation of Lumen's understanding of "NG-911" services.

RESPONSE:

See CenturyLink's response to Staff Data Request 7. The "NG-911" services can be found at Tariff No. 49, Section 9.

Respondent: CenturyLink Legal

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UTC STAFF DATA REQUEST NO. 9:

Please provide a list of competitive classification petitions or petitions for alternative forms of regulation, the docket numbers, and status of any competitive classification petitions or petitions for alternative forms of regulation, filed by the CenturyLink in states other than Washington to date.

RESPONSE:

CenturyLink is entirely or partially deregulated in each of Qwest Corporation's 14 state region. See the table below.

STATE	STATUS	LEGISLATION	COMMISSION ORDER
Arizona	Competitively classified	N/A	Docket No. T-01051B-11-0378
Colorado	Deregulated, except basic emergency services	CRS Section 40-15-401	N/A
Idaho	Deregulated	Idaho Code 62-605	N/A
Iowa	Deregulated	N/A	INU-2016-0001
Minnesota	Competitive market regulation in all but 4 wire centers	N/A	P-421/AM-16-496
Montana	Price deregulated	M.S.A. § 69-3-808	D2013.11.38
Nebraska	Price deregulated	Nebraska Revised Statute 86-139	
New Mexico	Price cap regulated; can seek competitive carrier status under 2023 statute	NMSA 1978, § 63-9A-8 (2023)	Company intends to seek competitive carrier status in 2024
North Dakota	Price deregulated	North Dakota Century Code 49-21-01.2	N/A
Oregon	Price Plan	N/A	UM 1908, 2206

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STATE	STATUS	LEGISLATION	COMMISSION ORDER
South Dakota	Regulated (minimal regulation in practice)	SD Stat. 49-31-3.2. (not petitioned)	N/A
Utah	COLR exemption petition filed	N/A	23-049-01
Washington	Under AFOR (expiring)	N/A	UT-130477
Wyoming	Deregulated	N/A	90000-113-XI-10, 90000-122-XI-15, 90000-128-XI-16, 70000-1644-TA-17

Respondent: CenturyLink Legal

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UTC STAFF DATA REQUEST NO. 10:

Please provide the dollar amount CenturyLink has invested in infrastructure in Washington, per year, from 2019 to 2023. Please also provide the locations of infrastructure investment in Washington State per year from 2019 to 2023.

RESPONSE:

CenturyLink objects to this data request on the basis that it is overly broad, unduly burdensome, vague and ambiguous and requires a special study. CenturyLink further objects on the basis that the request is not reasonably calculated to lead to the discovery of admissible evidence. The information sought is irrelevant to competitive classification. Among other things, this request appears to be seeking information regarding expenditures not relating to regulated services in Washington. Further, RCW 80.36.320 evaluates whether the company is subject to effective competition. It is unclear how scrutiny of the amount the company “has invested in infrastructure in Washington” addresses the question of whether the company has a substantial captive customer base or is otherwise subject to effective competition in the voice market.

Respondent: CenturyLink Legal

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UTC STAFF DATA REQUEST NO. 11:

Please provide:

- a. a network diagram, schematic or architecture map identifying CenturyLink's copper network in Washington State.
- b. a network diagram, schematic, or architecture map that shows CenturyLink's fiber optic network in Washington State.
- c. a network diagram, schematic, or architecture map that shows the transition plans (with dates) of copper to fiber optic cable deployment in Washington.

REQUESTED BY: Jonathon Church

RESPONSE:

CenturyLink objects to this data request on the basis that it is overly broad, unduly burdensome, vague and ambiguous and requires a special study. Without waiving its objections, CenturyLink responds as follows:

CenturyLink does not possess diagrams, schematics or "architecture maps" in the form requested herein. Furthermore, network maps of the types requested would be highly sensitive and incredibly voluminous and burdensome to produce. Commission Staff has access to the FCC's BDC data and Fabric, and has the ability to identify all locations in Washington where CenturyLink and affiliates can or do serve customers.

Respondent: CenturyLink Legal

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UTC STAFF DATA REQUEST NO. 12:

Regarding the “Mobile Voice” tab of Exhibit 1 to the Declaration of Peter Gose, please explain, in detail:

- a. The methodology for how CenturyLink estimated the availability of CMRS in the areas where the FCC’s hexagons straddled a CenturyLink wire center.
- b. The methodology for how CenturyLink estimated the areas where the hexagons were fully encompassed in a CenturyLink wire center.

RESPONSE:

A table was generated associating each H3 hexagon (index 9) to a wire center. Using software with GIS functionality, the centroid for each hexagon was calculated. The same GIS software compared each hexagon’s centroid to Lumen’s ILEC wire center GIS boundaries. Each hexagon where the centroid was within a wire center boundary was associated with that wire center. Hexagons whose centroids did not fall within a wire center boundary were not associated with any Lumen ILEC wire center.

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)

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UTC STAFF DATA REQUEST NO. 13:

Regarding the “WA Household Data(C)” tab of Exhibit 1 to the Declaration of Peter Gose, please explain the methodology CenturyLink used to determine the HOUSEHOLDS 2022 ESTIMATE for each wire center.

RESPONSE:

The household estimates data on tab “WA Household Data(C)” was gathered from Experian Marketing Solutions, Inc. data sets. The data is available to CenturyLink via the Alteryx software/data. The [Allocate Append Tool](https://help.alteryx.com/current/en/designer/tools/demographic-analysis/allocate-append-tool.html#allocate-append-tool) (<https://help.alteryx.com/current/en/designer/tools/demographic-analysis/allocate-append-tool.html#allocate-append-tool>) was used to estimate households.

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)

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UTC STAFF DATA REQUEST NO. 14:

Regarding the “WA Voice Share(C)” tab of Exhibit 1 to the Declaration of Peter Gose, please explain why CenturyLink did not include the CTL CLEC Voice subscribers or the ILEC VoIP subscribers in estimating the percentage of voice shares. Specifically, why were items 3, 11, and 15 on the “Access Line Count Data(C)” tab not included in estimating the percentage of voice shares?

RESPONSE:

The CenturyLink ILECs seek competitive classification because their copper-based voice services are subject to effective competition throughout their Washington service territories. It is primarily germane to identify how many regulated access lines the CenturyLink ILECs still provide in Washington. CenturyLink did include its affiliates’ VoIP customer in the table and pie charts in that tab. CenturyLink also called the Commission’s attention to them both in the petition (page 9) and in the Direct Testimony of Peter Gose (Exhibit PJG-1T at page 14). Overall, CenturyLink’s CLEC affiliates and non-regulated VoIP services serve very few customers, and do not in any alter the rather obvious conclusion that the CenturyLink ILECs are subject to effective competition. Whether the Commission focuses on CenturyLink’s 3.9% regulated market share or cobbles together other affiliate services to increase that total to 5.8%, CenturyLink is a small provider in the highly competitive telecommunications market in Washington. Mobile wireless carriers, by contrast, provide 78.7% of the voice connections in the state,

Respondent: CenturyLink Legal

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UTC STAFF DATA REQUEST NO. 15:

On tab “Access Line Count Data(C)” of Exhibit 1 to the Declaration of Peter Gose:

- a. Please explain why the June 30, 2022, total ILEC CenturyLink subscriber count (found in cell H23) does not include the ILEC VOIP subscribers.
- b. Additionally, please explain why the June 30, 2023, total ILEC CenturyLink subscriber count (found in H33) does not include the ILEC VOIP subscribers or ILEC Voice wholesale subscribers.

RESPONSE:

See CenturyLink’s response to Staff Data Request 14.

Respondent: CenturyLink Legal

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UTC STAFF DATA REQUEST NO. 16:

Please provide the number of wholesale subscribers, total revenue generated from wholesale, and percentage of revenues for each of CenturyLink's ILEC study areas.

RESPONSE:

CenturyLink objects to this data request on the basis that it is overly broad, unduly burdensome, vague, ambiguous and calls for a special study. CenturyLink further objects on the basis that the request is not reasonably calculated to lead to the discovery of admissible evidence. This proceeding considers whether CenturyLink's regulated retail services are subject to effective competition. CenturyLink does not seek any change to the manner in which the Commission regulates wholesale services. See Order 02, denying Charter's intervention on the same basis. The data sought by this request is not limited to wholesale local services, nor even to regulated wholesale services. Even if CenturyLink could discern what is being sought by this data request, and even if CenturyLink possessed the data in the form and manner requested, it would have no probative value in this case.

Respondent: CenturyLink Legal

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UTC STAFF DATA REQUEST NO. 17:

Out of the five PUD's CenturyLink included in the "All Fixed Providers" tab of Exhibit 1 to the Declaration of Peter Gose, how many provide direct residential or small business services to retail customers?

REQUESTED BY: Sean Bennett

RESPONSE:

This proceeding concerns whether the CenturyLink ILECs are subject to effective competition in their Washington service territories. The PUDs identified in the All Fixed Providers tab are – according to the FCC – capable of serving residential and business services at the number of locations identified in that tab. The tab does not purport to identify the number of customers they actually serve. Nor is that information determinative to question before the Commission. RCW 80.36.320 requires evidence of "effective competition" and explains that "[e]ffective competition means that the company's customers **have reasonably available alternatives** and that the company does not have a **significant captive customer base.**" (emphasis added). According to the Washington Public Utility District Association, "PUD fiber connects more than 64,000 end-users to broadband service." See Exhibit PJG-14. Customers can use those broadband connections for data and voice applications.

Respondent: CenturyLink Legal

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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

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UTC STAFF DATA REQUEST NO. 19:

For the period 1/1/2019 through 12/31/2023, provide all trouble tickets created by CenturyLink in response to customer trouble reports from its single-line basic exchange service customers in Washington, both residential and small business. Please provide all fields in those trouble ticket records, including but not limited to, those for: customer name, customer address, and telephone number; the date the report was made; type of service subscribed to; date the trouble was cleared; and all notes made by repair technician(s), trouble cause(s), and disposition of the trouble. Provide your response in electronic format, in one or more Excel-compatible (.xlsx) spreadsheets.

RESPONSE:

CenturyLink objects to this data request on the basis that it is overly broad, unduly burdensome, requires a special study and is not relevant nor reasonably calculated to lead to discovery of admissible evidence. This proceeding concerns whether the CenturyLink ILECs are subject to effective competition for voice services in their Washington service territories, and does not purport or seek to modify the Commission's current service quality regulation of the CenturyLink ILECs. Without waiving its objections, CenturyLink responds as follows.

CenturyLink will supplement its response.

Respondent: CenturyLink Legal

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UTC STAFF DATA REQUEST NO. 20:

RCW 80.36.320 contains a definition of “effective competition.” Effective competition means that the company’s customers have reasonably available alternatives and that the company does not have a significant captive customer base. Please provide a narrative explanation of CenturyLink’s position on the meanings of:

- a. “reasonably available alternatives”
- b. “significant captive customer base”

RESPONSE:

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

See the Prefiled Direct Testimonies of Peter Gose (Exh. PJG-1T) and Dr. Dennis Weisman (Exh DLW-1T).

Respondent: CenturyLink Legal

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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

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UTC STAFF DATA REQUEST NO. 22:

Did Mr. Gose use CostQuest's "Fabric" (either the commercial or the FCC version) when analyzing broadband availability data?

RESPONSE:

No. Licenses for use of the Fabric are extremely expensive, and Mr. Gose does not have access to it. However, Exhibit PJG-2C relies on the FCC's most recent BDC data, which is quite granular and location specific.

Respondent: Peter Gose, Director State and Local Government Affairs
(peter.gose@lumen.com; 303-324-5678)

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UTC STAFF DATA REQUEST NO. 23:

Did Mr. Gose remove or add any broadband serviceable locations?

RESPONSE:

No.

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)

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UTC STAFF DATA REQUEST NO. 24:

Does this analysis include locations in which the “BSL-flag” columns’ attribute is equal to: “True,” “False,” and both “True and False?”

RESPONSE:

”True”

Respondent: Peter Gose, Director State and Local Government Affairs
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UTC STAFF DATA REQUEST NO. 25:

This analysis is based on the number of “locations.” Does CenturyLink’s use of “locations” have the same meaning as a broadband serviceable location?

RESPONSE:

Yes, “location” is synonymous with “broadband serviceable location.”

Respondent: Peter Gose, Director State and Local Government Affairs
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UTC STAFF DATA REQUEST NO. 26:

Does this analysis include all locations that are identified as residential, business, mix, or group quarters?

RESPONSE:

Yes, it includes all of the above, but only includes mass market customers. See [Fabric FAQs – BDC Help Center \(fcc.gov\)](#) (“Why are locations with a BSL_Flag of False included with my data? The locations in the Fabric that have a BSL_Flag of “False” are structures that have or should have broadband service but likely do not take or would not take mass market service (and therefore do not fall within the definition of a BSL) based on available data.”).

Respondent: Peter Gose, Director State and Local Government Affairs
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UTC STAFF DATA REQUEST NO. 27:

The “Fabric” contains “units” column. Please provide a narrative response describing CenturyLink’s position regarding why it based its analysis on the number of locations rather than the number of units at each location. (i.e., an apartment building with four units would count as one location within your analysis but is four units with separate addresses and living units).

RESPONSE:

CenturyLink does not possess a license to the Fabric for these purposes. Its licenses are limited to use for BEAD funding/location challenges and twice-annual BDC reporting. Exhibit PJG-2C relies on publicly-available BDC data.

Respondent: Peter Gose, Director State and Local Government Affairs
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UTC STAFF DATA REQUEST NO. 28:

Did Mr. Gose use the public-facing ILEC Exchange Boundary map to identify the boundaries of its study area (and select all of the locations within) or did he use an internal wire center map?

RESPONSE:

CenturyLink used internal wire center maps to construct Exhibit PJG-2C.

Respondent: Peter Gose, Director State and Local Government Affairs
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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
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UTC STAFF DATA REQUEST NO. 30:

Did Mr. Gose remove a provider's data if the company reported speed availability below 100/20 Mbps, 25/3 Mbps, 10/1 Mbps, or 1/1 Mbps?

RESPONSE:

No. See CenturyLink's response to Staff Data Request 29.

Respondent: Peter Gose, Director State and Local Government Affairs
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UTC STAFF DATA REQUEST NO. 31:

Did Mr. Gose remove availability data where a provider does not offer mass-market internet services and the information was reported in error?

RESPONSE:

CenturyLink relied on the FCC's BDC data, which includes an ongoing challenge process designed to exclude inaccurate reporting.

Respondent: Peter Gose, Director State and Local Government Affairs
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UTC STAFF DATA REQUEST NO. 32:

Did Mr. Gose remove availability data where a provider reported residential availability, but it was reported to business locations and vice versa?

RESPONSE:

See CenturyLink's response to Staff Data Request 31.

Respondent: Peter Gose, Director State and Local Government Affairs
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UTC STAFF DATA REQUEST NO. 33:

Did Mr. Gose remove availability data for any provider that does not offer affordable service using any benchmark of affordability? If so, please specify the benchmark used by Mr. Gose.

RESPONSE:

CenturyLink objects to this data request on the basis that it is vague and ambiguous. Without waiving its objections, CenturyLink responds as follows.

It is unclear on what Staff bases the premise of this question, that a provider “does not offer affordable service using any benchmark of affordability.” See CenturyLink’s response to Staff Data Request 21. Affordability is determined by customers in a competitive market. Mr. Gose has not opined as to whether any particular competitor’s services would be deemed “affordable” by any or every Washington customer. But the fact remains that 96% of voice connections in Washington are provided by other providers (using a host of different technologies), and the customers utilizing those 96% of voice connections deem the service they chosen to be affordable. Competitors designated as eligible telecommunications carriers that offer low-income subsidies (e.g., Lifeline) do so throughout Washington using various technologies.

Respondent: CenturyLink Legal
Peter Gose, Director State and Local Government Affairs
(peter.gose@lumen.com; 303-324-5678)

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UTC STAFF DATA REQUEST NO. 34:

Please list the data sources (URLs when appropriate) and explain the methodology that Mr. Gose used to aggregate location counts to wire centers.

RESPONSE:

The data sources for the locations displayed in Exhibit PJG-2C include publicly available BDC data (Data Download - By State | FCC National Broadband Map; <https://broadbandmap.fcc.gov/data-download/nationwide-data?version=jun2023>), hex-8 shapefiles (for all competitors other than CMRS) and hex 9 shapefiles (for CMRS households). Note that hex-8 and hex-9 shapefiles are found at the same source (H3 Hexagon GIS Data | Powered by Box: <https://us-fcc.app.box.com/s/743307kjdy8yptlyto5wpgf2bp3wesyy>).

A table was generated associating each H3 hexagon (index 8) to a wire center. Using software with GIS functionality, the centroid for each hexagon was calculated. The same GIS software compared each hexagon's centroid to Lumen's ILEC wire center GIS boundaries. Each hexagon where the centroid was within a wire center boundary was associated with that wire center. Hexagons whose centroids did not fall within a wire center boundary were not associated with any Lumen ILEC wire center.

The publicly available location data includes the hex-8 designation for each location. It also includes each provider by technology with service available. For a given technology, (e.g., fiber) or group of technologies (e.g., fixed) the count of locations for each provider was calculated for each hexagon and then aggregated by wire center using the above referenced table. This produced the locations with service available for each provider.

Separately, a count of locations for each hexagon was calculated if service was available from any provider using the specified technology or group of technologies. This count was also aggregated by wire center using the table created to cross-reference the hex-8 hexagon to Lumen ILEC wire center.

BDC service from Lumen or any of its affiliates was excluded from this analysis.

Respondent: Peter Gose, Director State and Local Government Affairs
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UTC STAFF DATA REQUEST NO. 35:

Please provide the final wire center shapefile(s) (or other GIS format) that Mr. Gose used to create the various summaries found on each tab.

RESPONSE:

See Exhibit Staff 35.

Respondent: Peter Gose, Director State and Local Government Affairs
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UTC STAFF DATA REQUEST NO. 36:

This analysis includes 221 wire centers. Commission staff believes there are 222 wire centers. Did Mr. Gose include the wire centers included within the Clarkston Exchange?

RESPONSE:

The 221 wire centers do not include the Lewiston Sherwood wire center (LSTNIDSH). The Lewiston Sherwood wire center is partially within Washington and partially within Idaho. The Washington portion is the Clarkston exchange, and the Idaho portion is the Lewiston exchange.

Respondent: Peter Gose, Director State and Local Government Affairs
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UTC STAFF DATA REQUEST NO. 37:

What is the name of the wire center within the Clarkston Exchange?

RESPONSE:

See CenturyLink's response to Staff Data Request 36.

Respondent: Peter Gose, Director State and Local Government Affairs
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UTC STAFF DATA REQUEST NO. 38:

This analysis includes a “Total Locations” column on each of the tabs associated with broadband availability data. How was this figure calculated and does this calculation include residential, business, residential and business, and community anchor institutions?

RESPONSE:

The Total Locations shown in Exhibit PJG-2C are the broadband serviceable locations, as identified by the FCC in the publicly-available BDC data.

Respondent: Peter Gose, Director State and Local Government Affairs
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UTC STAFF DATA REQUEST NO. 39:

This analysis includes a “Wire Center Pop” and “Wire Center HH” columns on the “Mobile Voice” tab. Please list the data source for this information, provide the original data, and explain the methodology to summarize this information at the wire center level.

RESPONSE:

Wire Center Pop and Wire Center HH derive from the Experian data referenced in CenturyLink’s response to Staff Data Request 13. Experian’s methodology is described in the following URL: The [Allocate Append Tool](https://help.alteryx.com/current/en/designer/tools/demographic-analysis/allocate-append-tool.html#allocate-append-tool) (<https://help.alteryx.com/current/en/designer/tools/demographic-analysis/allocate-append-tool.html#allocate-append-tool>) was used to estimate households and population.

Respondent: Peter Gose, Director State and Local Government Affairs
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UTC STAFF DATA REQUEST NO. 40:

Please explain the difference between the “Wire Center HH” column on the Mobile Voice tab and the “Total Locations” column on the technology tabs. For example, Aberdeen wire center consists of 13,743 “Wire Center HH” on the Mobile Voice tab and 13,542 “Total Locations” on the Fiber tab.

RESPONSE:

See Exhibit PJG-1T (Direct Testimony of Peter Gose), footnote 12. Total Locations and Wire Center HHs come from different data sources. Total Locations are broadband serviceable locations derived from the publicly-available BDC data, while Wire Center HHs derive from Experian demographic data sets.

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UTC STAFF DATA REQUEST NO. 41:

This analysis includes a “Total Served” column on each of the tabs associated with broadband availability data. Please define what this means considering the broadband availability data does not measure subscribership.

RESPONSE:

See CenturyLink’s response to Staff Data Request 5.

Respondent: CenturyLink Legal

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UTC STAFF DATA REQUEST NO. 42:

On the Technology Type tabs, how is the “Total (technology type) Served” column calculated for each tab? For example, on the “Fiber” tab, is this the highest number of locations reported by a single provider or the sum of all providers for a given location?

RESPONSE:

Neither. For a given wire center, the “Total Served” reflects the number of unique locations with service available from any provider listed. This ensured that the numbers don’t include duplicative locations and are not inflated. This analysis was performed using Alteryx software.

Respondent: Peter Gose, Director State and Local Government Affairs
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UTC STAFF DATA REQUEST NO. 43:

Please provide a narrative response describing how these methods accurately portray internet access availability.

For example:

- a. Ephrata contains 3,901 “Total Locations” and 3,894 “Fiber Served” locations. Grant County Powernet reports 3,894 “Served”, Grant PUD reports 3,869 “Served” and Vyve Broadband reports 3,538 “Served”. It appears that the highest number of locations “Served” was input into the “Fiber Served” column.
- b. Zillah contains 2,029 “Total Locations” and 27 “Fiber Served” locations. Charter Communications, Inc. reports 25 “Served” and Lightspeed Networks reports 2 “served”. It appears that the sum of these columns was input into the “Fiber Served” column.

RESPONSE:

See CenturyLink’s response to Staff Data Request 42.

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UTC STAFF DATA REQUEST NO. 44:

On the Mobile Voice tab:

- a. Does this analysis take into consideration and differentiate between 3G, 4G, and 5G Availability?
- b. Please provide the source for the “Wire Center Pop” and provide the methodology to allocate the estimates to each wire center.
- c. Please define the “Mobile HH” column.
- d. How did Peter J. Gose assess mobile voice availability within structures when the mobile availability propagation models only assesses outside availability?

RESPONSE:

- a. No; voice calls can be made with 3G, 4G or 5G.
- b. See CenturyLink’s response to Staff Data Request 39.
- c. Mobile HH reflects the number of households served in the wire center by CMRS providers.
- d. CenturyLink relied upon the FCC’s publicly-available BDC data, supplied by the mobile carriers. CenturyLink does not believe that the data distinguishes between inside and outside propagation.

Respondent: Peter Gose, Director State and Local Government Affairs
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UTC STAFF DATA REQUEST NO. 45:

On the Modality Graph Data tab:

- a. Why does this tab use “Total Locations” information rather than “Wire Center HH” information?
- b. In the “Total Competitors in Wirecenter” column:
 1. Does this analysis remove providers that do not offer mass-market retail internet service to residential or small businesses?
 2. Does this analysis remove service offerings if the price is more than CenturyLink’s R1 rate?
 3. Does this analysis remove service offerings based on the price of the service?
 4. Do all competitors have at least one subscriber within the wire center?
 5. Does this analysis remove broadband availability data if the available service was lower than 100/20 Mbps, 25/3 Mbps, 10/1 Mbps, or 1/1 Mbps?
 6. Does this analysis take into account the number of locations that have mobile voice or internet available?
- c. In the “Total Modalities in Wirecenter” column:
 1. Does this analysis remove providers that do not offer mass-market retail internet service to residential or small businesses?
 2. Does this analysis remove unaffordable service offerings?
 3. Do all competitors under each modality have at least one subscriber within the wire center?
 4. Does this analysis remove broadband availability data if the available service was lower than 100/20 Mbps, 25/3 Mbps, 10/1 Mbps, or 1/1 Mbps?
 5. Does this analysis take into account the number of locations that have mobile voice or internet available?

RESPONSE:

- a. The number of locations does not factor into the construction of the Modality Graph data. It was constructed using the COUNT function in Excel in the tabs for individual technologies. The methodology can be ascertained from the cells in the tab itself.
- b. Total competitors:
 1. No, the analysis derives from the FCC’s BDC data, which is limited to mass market service.
 2. No.
 3. No.
 4. CenturyLink does not have access to provider subscriber counts; however, all customers in each wire center have multiple choices, using multiple technologies, for voice services. Exhibit PJG-1T, Graphic 1 reveals that the overwhelming majority of Washington mass market customers take service from providers other than the CenturyLink ILECs.

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5. No.
 6. CenturyLink does not understand the question, as written.
- c. Total Modalities: see CenturyLink's responses to Staff Data Request 45.b. Regarding subsection c.2., the question presumes that competitive offerings are unaffordable. Customers across all CenturyLink ILEC wire centers in Washington have multiple service options, across numerous technologies, and have voted with their feet and wallets. See CenturyLink's response to Staff Data Requests 21 and 33.

Respondent: Peter Gose, Director State and Local Government Affairs
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UTC STAFF DATA REQUEST NO. 46:

In the “WA Household Data (C)” tab:

- a. Please provide the data source for the estimated 2022 households by wire center and explain the methodology used to aggregate this information to the wire center level.
- b. Please provide a narrative response describing whether CenturyLink believes the household estimate data is more appropriate than using the Fabric’s residential identifier and explain why small business data is not necessary.

RESPONSE:

- a. The source is the Experian data referenced in prior answers. CenturyLink’s methodology was to input CenturyLink’s wire center into the Alteryx tool, and that tool (relying Experian data) identifies the number of households per wire center. See CenturyLink’s response to Staff Data Request 39).
- b. This question presumes that CenturyLink takes a position as to which data source is “more appropriate.” CenturyLink relies on publicly-available BDC data, and (as described in response to Staff Data Request 17) does not have a license to the Fabric for these purposes.

Respondent: Peter Gose, Director State and Local Government Affairs
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UTC STAFF DATA REQUEST NO. 47:

In the “Access Line Count Data (C)” tab, Mr. Gose provided a high-level overview of subscribers:

- a. Please provide the locations of all subscribers receiving copper-based services in a shapefile or other widely accepted GIS format.
- b. Does CenturyLink offer VoIP service on a standalone basis or does a customer have to subscribe to internet service?
- c. Does a CenturyLink affiliate offer VoIP service within the CenturyLink study areas?
- d. What is the consumer price for standalone or bundled service?
- e. Please provide the locations for all VoIP subscribers in a shapefile or other widely accepted GIS format.

RESPONSE:

- a. CenturyLink objects to this data request on the basis that it requires a special study and on the basis that it is vague and ambiguous in that it does not identify whose subscribers Staff seeks locations for.
- b. See Exhibit PJG-2C (Access Line Count Data(C)), which identifies a very small number of consumer VoIP lines provided by the CenturyLink ILECs in Washington in 2022 and 2023.
- c. CenturyLink objects to this data request on the basis that it is vague and ambiguous in its use of the term “study areas.” CenturyLink assumes that Staff intended to reference “wire centers.” With that understanding, yes.
- d. CenturyLink objects to this data request on the basis that it is vague and ambiguous. Staff does not specify which service it seeks consumer pricing for. Generally, CenturyLink service offerings can be found at www.lumen.com and/or www.centurylink.com.

Respondent: Peter Gose, Director State and Local Government Affairs
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