

**BEFORE THE  
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of Frontier Communications )  
Northwest Inc.'s Petition to be Regulated )  
as a Competitive Telecommunications )  
Company Pursuant to RCW 80.26.320 )  
\_\_\_\_\_ )

Docket No. UT-121994

**EXHIBIT \_\_\_ AHA-5**

**BEFORE THE NEW MEXICO PUBLIC REGULATION COMMISSION**

**IN THE MATTER OF THE PETITION OF QWEST  
CORPORATION D/B/A CENTURYLINK QC  
("CENTURYLINK") FOR A DETERMINATION  
THAT TELECOMMUNICATIONS SERVICES  
ARE SUBJECT TO EFFECTIVE COMPETITION  
IN NEW MEXICO**

**CASE NO. 11-00340-UT**

**DIRECT TESTIMONY  
OF  
ROBERT H. BRIGHAM  
ON BEHALF OF  
CENTURYLINK QC  
OCTOBER 11, 2012  
  
PUBLIC VERSION**

**2012 OCT 11 PM 3 50**

**NEW MEXICO  
PUBLIC REGULATION  
COMMISSION  
FILED**

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**I. IDENTIFICATION OF WITNESS**

**Q. PLEASE STATE YOUR NAME, BUSINESS ADDRESS AND POSITION WITH CENTURYLINK.**

A. My name is Robert H. Brigham. My business address is 1801 California Street, Denver, Colorado, and I am currently employed by CenturyLink as a Regulatory Operations Director. I am testifying on behalf of CenturyLink QC.

**Q. PLEASE DESCRIBE YOUR EDUCATIONAL BACKGROUND AND EMPLOYMENT EXPERIENCE.**

A. In 1983, I received a Master of Business Administration (MBA) degree from the University of Colorado in Denver, Colorado. My area of emphasis was financial analysis. I received a Bachelor of Arts degree in 1974 from Stetson University.

I began my employment with CenturyLink (formerly Mountain Bell, U S WEST and Qwest) in 1976. Between 1976 and 1980, I held various positions in the Mountain Bell Commercial (marketing) department. In 1980, I accepted the position of Analyst in the Cost, Rates and Regulatory Matters department, working primarily on the development of embedded cost data. In June 1987, I accepted the position of Manager in the U S WEST Service Cost organization, with responsibility for economic analysis and the development of incremental costing methodologies. In September 1992, I accepted the position of Director- Product Cost Specialist, and assumed responsibility for developing and supporting U S WEST cost studies in formal regulatory proceedings, and representing U S WEST in costing and pricing workshops sponsored by various regulatory commissions in the U S WEST region. Between May 1994 and June 1997, I served as Director- Product and Market Issues. In that position, I managed competitive and local interconnection

1 issues, supporting U S WEST's interconnection negotiation and arbitration efforts. In June,  
2 1997, I rejoined the U S WEST cost organization as Director- Service Costs, where I was  
3 responsible for managing cost issues, developing cost methods and representing Qwest in  
4 proceedings before regulatory commissions. I held this position until April 2004, when I  
5 assumed the position of Staff Director in the Qwest Public Policy department, with  
6 responsibility for representing Qwest on pricing, competitive, economic and other  
7 regulatory issues. In April 2011, I accepted my current position with CenturyLink,  
8 handling regulatory operations issues for several states..

9  
10 **Q. HAVE YOU PREVIOUSLY SUBMITTED TESTIMONY BEFORE THE NEW**  
11 **MEXICO COMMISSION?**

12 A. Yes. In 2009, I testified for Qwest in Case No. 09-00094-UT ("In The Matter Of The  
13 Development Of An Alternative Form Of Regulation Plan For Qwest Corporation").

14  
15 **Q. HAVE YOU TESTIFIED BEFORE OTHER STATE REGULATORY**  
16 **COMMISSIONS?**

17 A. Yes. I have presented testimony before commissions in Arizona, Colorado, Iowa,  
18 Minnesota, Montana, Nebraska, North Dakota, Oregon, South Dakota, Utah and Wyoming.

19  
20 **II. INTRODUCTION**

21  
22 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

23 A. On September 9, 2011, CenturyLink QC filed a petition seeking a determination pursuant  
24 to NMSA 1978, § 63-9A-8 that telecommunications service, including but not limited to  
25 basic local exchange service and all associated features and services, is subject to "effective

# **EXHIBIT**

# **RHB - 1**

**New Mexico Consumer Market Share**  
**(Centris Data)**

	3Q10	4Q10	1Q11	2Q11	3Q11
Voice Lines - CenturyLink	53.5%	51.3%	49.1%	47.4%	45.6%
Total Cable Telephony	10.0%	10.3%	10.5%	10.7%	10.8%
CableOne	0.6%	0.7%	0.7%	0.8%	0.8%
Comcast	8.7%	8.8%	9.0%	9.1%	9.2%
Other	0.7%	0.8%	0.8%	0.8%	0.8%
VoIP	0.8%	0.8%	0.8%	0.8%	0.8%
CLECs	0.8%	0.8%	0.7%	0.7%	0.6%
Wireless Substitution	28.8%	30.8%	32.8%	34.8%	35.7%
No Voice/Other	6.0%	6.0%	6.0%	5.6%	6.4%
Total	100%	100%	100%	100%	100%

Centris data is developed from survey data, third party data bases and market models for CenturyLink QC's market panning and competitor intelligence purposes. Although deemed to be representative of market conditions, Centris makes no representations or warranties to third parties regarding the accuracy of this data.

# **EXHIBIT**

# **RHB - 2**

## New Mexico SMB Wireline Market Share

### Small business

	3Q11	4Q11
L-Qwest	71.0%	70.3%
Comcast	6.0%	6.4%
Other CLEC	2.8%	2.9%
tw telecom	2.1%	2.2%
Level 3	1.8%	1.9%
Paetec	1.6%	1.6%
Verizon	0.4%	0.4%
AT&T	0.1%	0.1%
All Other Type	14.2%	14.2%

### Medium business

L-Qwest	72.2%	71.5%
tw telecom	7.1%	7.0%
Comcast	5.6%	6.2%
Other CLEC	6.1%	6.2%
Paetec	3.2%	3.3%
Level 3	1.5%	1.5%
Verizon	0.8%	0.8%
AT&T	0.5%	0.5%
Other Cable	0.3%	0.3%
All Other Type	2.7%	2.7%

Centris data is developed from survey data, third party data bases and market models for Qwest's market panning and competitor intelligence purposes. Although deemed to be representative of market conditions, Centris makes no representations or warranties to third parties regarding the accuracy of this data. Small business is defined as firms spending <\$1,500 / month (ex-wireless) and Mid Markets are firms spending between \$1,500 and \$5,000/ month (ex-wireless)