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7/2/2024

Attention: Jeff Killip, Executive Director and Secretary
Washington Utilities and Transportation Commission
621 Woodland Square Loop SE
Lacey, WA 98503

Subject: Public Comment on Docket UT-240029

To the Commission:

I am writing to submit a public comment regarding the Centurylink Petition for Competitive Classification, filed as Docket UT-240029, January 8, 2024. I am employed by San Juan County as the 911 Coordinator.

In the course of my duties as 911 Coordinator, I review the systems which are used and depended upon by the public in emergencies to request emergency assistance, for sharing information with responders and others, and receiving emergency information and notifications.

I am writing to oppose the Centurylink petition for "Centurytel of Interisland" to be reclassified as a Competitive Local Exchange Carrier (CLEC) from the current classification as an Incumbent Local Exchange Carrier (ILEC). This office is concerned that reclassification may lead to degradation or abandonment of wireline voice grade circuits which provide dial tone services to the public in San Juan County.

Examination of information more specific to the unique conditions and characteristics of the islands making up San Juan County provides a more complete picture of the circumstances which support maintaining the current classification of "Centurytel of Interisland" as an ILEC. These include the following:

- Senior citizens represent a greater percentage of residents in San Juan County than in most other counties. This cohort relies on wireline phones more than cell phones, or Voice Over Internet (VOIP) phones. In San Juan County, a greater percentage of calls to 911 are made on wireline phones than is typical in other counties.
- On one island, the Senior Services uses a "Buddy Check-in" on Seniors after severe weather or other isolating events. This service has over 800 users, the majority of whom use local prefix phone numbers, which are mostly wireline Centurytel phone lines.



- Emergency notifications are much more accurately delivered to wireline phone numbers associated with street addresses than mobile numbers. When delivered over wireline, these notifications are routed to addresses in ALI databases whereas delivery to cellular numbers relies on reverse-geocoded locations. This makes the delivery of “Reverse 911” type messages with emergency and public safety information much more reliable when sent to wireline numbers.
- There is a lower presence of other providers in San Juan County than in most of the other areas where Centurylink provides service in Washington state. The providers include the following:

Fiber-based landline – 1 provider, Rock Island provider \$85.00/ month minimum plus fees.

Cable-based - Cable is available only in the Town of Friday Harbor on San Juan Island.

Commercial Satellite Service – 3 providers; Viasat \$119.99/month, Hughesnet \$74.99/month \$14.99/month lease plus fees, Starlink \$120.00/month, \$499 Hardware

Fixed Wireless - Rock Island \$80.00/ month minimum plus fees. Not available in many areas of the islands, Orcas Online \$79.00 for mid-range offering.

Commercial Mobile Radio Service (Cellular) – ATT, Verizon and T-Mobile provide service, but due to the varied topography in the islands there are still areas in which the service is not reliable, especially indoors.

- Providers of voice service, other than cellular in San Juan County are all internet providers and voice connections are Voice Over Internet Protocol (VOIP). The internet providers are not subject to price regulation by UTC and may result in greater costs to consumers than the current Centurylink offerings.
- As evidenced by the November 2013 near two-week communications outage which affected all of San Juan County after the underwater fiber optic cable was severed, the communications resources of the county are vulnerable in unique ways and need extra protective measures.

This office is concerned that if approved, the change in the classification from an ILEC to a CLEC will result in degradation of the “Centurytel of Interisland” voice circuits which will in turn cause additional migration away from Centurytel phone lines. The VOIP alternatives are not plentiful and, in many cases, cost more than Centurylink offerings. This will have a disproportionate and greater impact on Seniors and those residents with lower incomes. The change may reduce the affordability of voice connectivity, may force consumers to migrate to cell phones, and will negatively affect the ability to distribute information in emergencies.

In conclusion, approval of the Centurylink petition to change the classification of “Centurytel of Interisland” from an ILEC to a CLEC is not in the best interests of the residents of San Juan County from a



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public safety and consumer affordability perspective and this office urges the commission to maintain the current classification.

I appreciate the opportunity to provide comment on Docket UT-240029. Please consider my comments as part of your decision-making on the outcome of the petition.

Thank you for your attention.

Sincerely,

Dave Halloran
San Juan County | 911 Coordinator