

**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.

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DOCKET UT-240029

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

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**EXHIBIT DB-10**

Staff Email Response to Public Counsel June 12, 2024, Request for Price Point Analysis  
from Sean Bennett's Enhanced Competition Study, with Attachment A

**July 12, 2024**

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**From:** Roberson, Jeff (ATG)  
**Sent:** Thursday, June 27, 2024 9:57 AM  
**To:** O'Neill, Tad Guy (ATG); 'Sherr, Adam'  
**Cc:** Jones, Cassandra (ATG); Johanson-Kubin, Jessica (ATG)  
**Subject:** RE: UT-240029

Counselors,

Attached is Sean's analysis for the number of CCLs using each of the price points identified below. Sean has provided his explanation of each iteration of the analysis at the bottom of each worksheet.

Please let me know if you have any questions or need to talk about anything. I do note that Sean is out of the office starting Monday, and back (I think) July 10<sup>th</sup>, so please keep that in mind.

Best,  
Jeff



PCDataRequest\_...

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**From:** O'Neill, Tad Guy (ATG)  
**Sent:** Wednesday, June 12, 2024 1:38 PM  
**To:** Roberson, Jeff (ATG) <jeff.roberson@atg.wa.gov>; 'Sherr, Adam' <Adam.Sherr@lumen.com>  
**Cc:** Jones, Cassandra (ATG) <cassandra.jones@atg.wa.gov>; Johanson-Kubin, Jessica (ATG) <jessica.johanson-kubin@atg.wa.gov>  
**Subject:** UT-240029

Jeff,

Public Counsel understands that Sean Bennett has been able to run a report identifying the number of households included in his competition study that would be included under various price points for what is considered "affordable." Per our agreement to provide responsive testimony by July 12, we are requesting that UTC Staff provide the numbers of households that would be unable to afford fixed internet at the settlement price of \$61.13, the price of \$55.13 from the original testimony, and \$41.31, which is from the attached US telecom survey. We would also ask for the numbers of consumers what would be identified as challenging consumer location under "mobile wireless as determined by GIS mapping of CenturyLink's local customers and the FCC's Broadband Data Collection fixed internet data and mobile wireless data."

<< File: Internet price USTelecom-2023-BPI-Report-final.pdf >>

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**ATTACHMENT A OF EXHIBIT DB-10**

Analysis 1

environMV (Mobile Voice)		(All)					
Count of ADDRESS	Column Labels					Grand Total	
Row Labels	Not Reported	Speed < 4/1 Mbps	Speed < 25/3 Mbps and >= 4/1 Mbps	Speed < 100/20 Mbps and >= 25/3 Mbps	Speed >= 100/20 Mbps		
CENTURYTEL OF COWICHE, INC.	14		16	135	218	383	
CENTURYTEL OF INTER-ISLAND, INC.	2745		180	94	645	3664	
CENTURYTEL OF WASHINGTON	14580	159	3517	2907	5720	26883	
QWEST CORPORATION	58777	117	11577	26647	57868	154986	
UNITED TELEPHONE COMPANY OF THE NORTHWEST	3466		1295	1127	3475	9363	
Grand Total	79582	276	16585	30910	67926	195279	

Analysis 2

environMV (Mobile Voice)		Not Reported				
Count of ADDRESS	Column Labels					Grand Total
Row Labels	Not Reported*	Speed < 25/3 Mbps and >= 4/1 Mbps*	Speed < 100/20 Mbps and >= 25/3 Mbp	Speed >= 100/20 Mbps		
CENTURYTEL OF INTER-ISLAND, INC.	242	7	1		70	320
CENTURYTEL OF WASHINGTON	252	2	15		31	300
QWEST CORPORATION	608	50	40		286	984
UNITED TELEPHONE COMPANY OF THE NORTHWEST	53	2			15	70
Grand Total	1155	61	56		402	1674

\*These subscribers meet the definition of CCLs as defined under the Proposed AFOR.

Notes

Analysis 1 is the number of CenturyLink subscriber addresses with fixed internet availability at a price below \$61.13. Analysis excludes enterprise providers, CenturyLink, Quantum, satellite providers, and broadband availability data for providers that report 25/3 Mbps or faster service at a price above \$61.13  
 Analysis 2 is a subset of Analysis 1 and is only those addresses to which Mobile Voice service is not reported to the surrounding area. Mobile service price is not taken into account. There are 1,216 CCLs when mobile price is not taken into account.

Analysis 3

environMV (Mobile Voice)		(All)					
Count of ADDRESS	Column Labels						
Row Labels	Not Reported	Speed < 4/1 Mbps	Speed < 25/3 Mbps and >= 4/1 Mbps	Speed < 100/20 Mbps and >= 25/3 Mbps	Speed >= 100/20 Mbps	Grand Total	
CENTURYTEL OF COWICHE, INC.	113	16		36	218	383	
CENTURYTEL OF INTER-ISLAND, INC.	2745			180	94	3664	
CENTURYTEL OF WASHINGTON	16347	194		2350	2368	26883	
QWEST CORPORATION	64174	332		9203	24494	154986	
UNITED TELEPHONE COMPANY OF THE NORTHWEST	4673	55		910	251	9363	
<b>Grand Total</b>	<b>88052</b>	<b>597</b>		<b>12679</b>	<b>27425</b>	<b>195279</b>	

Analysis 4

environMV (Mobile Voice)		Not Reported					
Count of ADDRESS	Column Labels						
Row Labels	Not Reported*	Speed < 4/1 Mbps*	Speed < 25/3 Mbps and >= 4/1 Mbps*	Speed < 100/20 Mbps and >= 25/3 Mbps	Speed >= 100/20 Mbps	Grand Total	
CENTURYTEL OF INTER-ISLAND, INC.	242			7	1	320	
CENTURYTEL OF WASHINGTON	252			2	15	300	
QWEST CORPORATION	626	1		48	40	984	
UNITED TELEPHONE COMPANY OF THE NORTHWEST	53			2	15	70	
<b>Grand Total</b>	<b>1173</b>	<b>1</b>		<b>59</b>	<b>56</b>	<b>1674</b>	

\*These subscribers meet the definition of CCLs as defined under the Proposed AFOR.

Notes

Analysis 3 is the number of CenturyLink subscriber addresses with fixed internet availability at a price below \$55.13. Analysis excludes enterprise providers, CenturyLink, Quantum, satellite providers, and broadband availability data for providers that report 25/3 Mbps or faster service at a price above \$55.13. Analysis 4 is a subset of Analysis 3 and is only those addresses to which Mobile Voice service is not reported to the surrounding area. Mobile service price is not taken into account. There are 1,233 CCLs when mobile price is not taken into account.

Analysis 5

environMV (Mobile Voice)		(All)					
Count of ADDRESS	Column Labels					Grand Total	
Row Labels	Not Reported	Speed < 4/1 Mbps	Speed < 25/3 Mbps and >= 4/1 Mbps	Speed < 100/20 Mbps and >= 25/3 Mbps	Speed >= 100/20 Mbps	Grand Total	
CENTURYTEL OF COWICHE, INC.	383					383	
CENTURYTEL OF INTER-ISLAND, INC.	3019				645	3664	
CENTURYTEL OF WASHINGTON	25129			67	1687	26883	
QWEST CORPORATION	133362	9	15	1470	20130	154986	
UNITED TELEPHONE COMPANY OF THE NORTHWEST	8594				769	9363	
<b>Grand Total</b>	<b>170487</b>	<b>9</b>	<b>15</b>	<b>1537</b>	<b>23231</b>	<b>195279</b>	

Analysis 6

environMV (Mobile Voice)		Not Reported			
Count of ADDRESS	Column Labels				Grand Total
Row Labels	Not Reported*	Speed < 100/20 Mbps and >= 25/3 Mbps	Speed >= 100/20 Mbps		Grand Total
CENTURYTEL OF INTER-ISLAND, INC.	250		70		320
CENTURYTEL OF WASHINGTON	278		22		300
QWEST CORPORATION	788	4	192		984
UNITED TELEPHONE COMPANY OF THE NORTHWEST	58		12		70
<b>Grand Total</b>	<b>1374</b>	<b>4</b>	<b>296</b>		<b>1674</b>

\*These subscribers meet the definition of CCLs as defined under the Proposed AFOR.

Notes

Analysis 5 is the number of CenturyLink subscriber addresses with fixed internet availability at a price below \$44.31. Analysis excludes enterprise providers, CenturyLink, Quantum, satellite providers, and broadband availability data for providers that report 25/3 Mbps or faster service at a price above \$44.31. Analysis 6 is a subset of Analysis 5 and is only those addresses to which Mobile Voice service is not reported to the surrounding area. Mobile service price is not taken into account. There are 1,374 CCLs when mobile price is not taken into account.