

Public Comments by Case

Total Comments: 122

In Favor: 0

Opposed: 117

Undecided: 5

Filing Support	Commenter	Source	Comments
No			
	Andrew Clinick	E-mail	<p>I believe that where I live, Fall City, is classed as rural with regard to broadband. If not then perhaps it should be. Centurylink (Lumen) hasn't offered anything close to broadband in the nearly 10 years that I have lived here. The best offer they provide is 3Megabits per second which I think we can agree is not broadband. As a result the only choice I have is Xfinity. On the surface they seem decent ~1.2 Gigabits download but only 40 Megabits upload but when you consider that you have to pay for no data caps it soon becomes very expensive compared to markets where they have competition. I pay \$141.00 a month for 1 gigabit connection and no data caps. I run my own business from home (I'm a tech consultant) and have significant network infrastructure at home. Xfinity will not charge for data caps if you use their hardware that you must rent from them at \$25 a month. To be polite their network equipment for home is lacking in capabilities.</p> <p>If I were to live in a community with either a. competition or b. a PUD that actually invests in infrastructure I would be paying significantly less. For example, in Plain,WA 1 Gigabit symmetric is \$69 a month and that community is extremely rural. If Zply fiber were able to support our address it would also be \$69 a month. They cannot move into this area because of the UTC. The UTC is there to ensure service for consumers yet is doing the exact opposite. Centurylink have not upgraded their service in the Fall City area for decades and it would appear have no plans to do so.</p> <p>How can WA state continue in this way? We are supposed to be a state at the forefront of technology yet it seems to be stymied by legislation and rules approved in the last century. At the very least if we continue to enable a state sanctioned monopoly on broadband provision then ensure that those broadband providers have to offer the same rates as they do</p>

			<p>in regions with no state sanctioned monopoly. Look at Xfinity, they do not impose a data cap in regions where they have real competition and their monthly rates are dramatically lower.</p> <p>Andrew</p>
	Laurie A Baughman	E-mail	<p>The phone companies have created problems which led to the development of alternative services. That's on them.</p> <p>Today, I saw a notice that they are charging consumers, beginning July 12, 2024, \$3.00 to pay by Visa or Debit. So they get the benefit of secure, rapid, online payments, avoiding paying humans to process them and charge consumers for the privilege. The push to online platforms to conduct business means using credit or debit cards. The proliferation of fraud is a result of businesses not taking cybersecurity seriously. Again, consumers pay.</p> <p>Did you already grant the application??</p> <p>Did you grant them permission to charge the extra fees?</p> <p>Please deny their application for "competitive status"</p> <p>Laurie A Baughman</p>
	Tracy Mccune	E-mail	<p>Per our conversation I am submitting my final comment to the Century link hearing tomorrow. If you would kindly forward it to the commissioners to read before the hearing I would appreciate it.</p> <p>Dear Commissioners;</p> <p>The decision you make tomorrow will have a huge impact to the people in the state of Washington. If century link gets their way all landline service will end.</p> <p>Landlines are regulated and are all owned and maintained by one provider century link.</p> <ol style="list-style-type: none"> 1. Landline's are owned and maintained by century link. 2. Landlines are regulated. Century link can not discontinue the service for landlines under the current UTC regulations. 3. Landlines do not lose signal to the priority lines by First Response agencies 4. Century link is not offering land line service to new customers.

			<p>5. The majority of customers that have landlines have had the landline for many years.</p> <p>6. Many if not most are seniors and/or live in a location that does not have a cellular signal,</p> <p>7.Landline phone lines can be used to connect to the internet.</p> <p>8. In locations where there is zero cellular signal the landline phone is the only way to connect to the internet.</p> <p>9. First Response Agencies have priority for all communication lines (except landlines)</p> <p>Cell phones are not regulated and have many companies that provide them</p> <ol style="list-style-type: none"> 1. Each cell phone carrier needs to have a tower to distribute the signal. 2. The towers do not accommodate all cell service providers. 3. The signal does not work in areas without line of site to the tower. 4. The population depend on their cell phones to communicate. 5. The cell signal will not go thru if a First Response Agency has priority to the communication lines. 6. The priority service to the Response Agencies do not only happen during an emergency. 7. Many First Response agencies use their priority service thru the phone carrier on their personal cell phone. 8. Most cell phone providers have plans which include free cell phone sims to fire districts, public works. law enforcement, medical services, and many other government agencies. 9. There is zero oversight on the priority lines and there is no accountability to who can use the lines or how much of the current cell phone signal is being used exclusively by these response agencies. <p>Deregulating century link would have a negative effect on the ability to communicate as we do now.</p> <p>Before taking away the only form of communication that is reliable there needs to be oversight and regulations put on cell phone companies that offer priority lines.</p> <p>Please include these comments in the hearing tomorrow.</p> <p>Thank you Tracy Mccune</p>
	Carol Hookham	E-mail	To Whom It May Concern,

			<p>When we moved to the Colville Washington area in 2004 we purchased landline services from CenturyLink.</p> <p>We not only depend upon the landline for everyday communication, but it is also necessary for my husband's self-employed business as a house painter.</p> <p>In essence, the landline has a dual purpose, as a business contact number as well as a residential line. Therefore, the removal of the landline would have an economic impact on our family.</p> <p>I'm asking you to reconsider your proposal to remove the landline from Stevens county.</p> <p>Thank you,</p>
	Carol Wilkinson	E-mail	<p>Case Number: 240029</p> <p>Dear Sir/Madam:</p> <p>I would like to ask that WUTC deny the request from CenturyLink to change from utility company regulations on land line phones to a competitive company, who plans are to disconnect 800 land line phones.</p> <p>Land line phones are necessary in the type of mountainous terrain we live in. Cell phone signal coverage is impossible to count on. Without a land line phone, I would, at times be left with no phone service at all. The claim by CenturyLink that 911 services would be covered does not apply to numerous emergency situations in which I need to make or receive phone calls. I hope it will be factored that the people most affected by this decision are opposed to losing their phone service. While CenturyLink personal will not be affected with their phone service at all. Washington state residents need to be the top priority of the Washington state utilities commissioners. Please factor our needs as more important than CenturyLink's competitive desires.</p> <p>Thank you for your help.</p> <p>Carol Wilkinson</p>

			CC: Senator Shelly Short
	Kathleen Stolp Smith and Raymond	E-mail	<p>It is my understanding that CenturyLink has filed to become a Competitive Telecommunication Company. As I read it that means that their customers have reasonable alternatives. I would beg to differ with that in the case of many I know in this area. On just our short road, Bundy Road, I know of at least 3 households that would have to drive at least a mile or more down the road in order to receive any cellular service, which I assume they would consider an alternative to our line service provided by CenturyLink. And even though coverage maps show our area with coverage, it is not the case for many of us because of the hills which surround our homes. In the 3 households I mentioned above, all contain persons over 80. If we were to lose our lined service what would we do in case of an accident or medical emergency, the incidence of which seems to be greater with age. Also these lines are needed to make appointments and speak to medical professionals and for them to contact us. I am sure we are not alone in our need for this service as our only communication method. I have driven between Chewelah and Colville and noticed many spots with no cell service.</p> <p>I have been receiving repeated calls telling me that the phone companies are discontinuing the copper lines. They want to send us a digital device to plug our house phones into to continue using them. Because they are looking at a digital coverage map that shows service in our area they are almost impossible to convince that such a device will not work for us. They want to explain it away with a metal roof or something. I have to be very insistent that I have walked all over my yard outside any building and there is no service available. Just last week I met my elderly neighbor who lives up our road parked about a mile down the road toward town. She had trouble with her phone service and had to drive 2 miles to get cell service to make a call. What would have happened had she fallen or had an accident that she couldn't drive. We need our copper lines in many places in the country.</p> <p>In my opinion we have many rural customers who do not have any reasonable alternatives to the service provided by CenturyLink. To my knowledge there are no other companies providing service to us. So if this petition allows them to discontinue our service, I would like to protest against CenturyLink being granted this petition.</p> <p>Sincerely,</p> <p>Kathleen Stolp Smith Raymond Smith</p>

	Walter F. Stichert	E-mail	<p>Rather than seeing total land line removal as impacting me personally it can be detrimental to the common good. And I don't mean just to the limited number of private individuals. It can severely affect the nation.</p> <p>Consider the fragility of the cell service if it were confronted, for example, with the replication of a solar flare by an enemy in space. A solitary cell system negatively impacts our defenses.</p> <p>Wisdom impels us to keep and maintain an alternative system of communication - at least a minimal network of land lines for private citizens and the national welfare. The State can exemplify this vision in dealing with the private sector. Walter F. Stichert</p>
	Mistie Ames	E-mail	<p>Dear Utilities and Transportation Commission,</p> <p>In reference to docket #240029, I'm writing today to ask that you please oppose Centurylink's removal of our telephone landlines. In this rural, mountainous Eastern Washington community we depend greatly on the landline telephone service for our daily basic communication needs. And, much more importantly, we depend on landlines in emergencies. Make no mistake, there are many residents here in our tri-county area that depend solely on landlines for emergency communications. What in the world is the state thinking? Is it acceptable to rob Washington State residents of the ability to contact 911 in an emergency situation? Landlines are lifelines. I'm sure this is difficult for west coast bureaucrats to comprehend--yes, there are still people who live outside of the urban megatropolis matrix with all of its high tech communication network advantages. Hello, nice to meet you.</p> <p>Many of our residents do not have access to alternative forms of communication. There are many homes that are in no-coverage cell phone zones. We here at our address have inconsistent and unreliable cell coverage. Also, many residents have zero access to internet services. Even where internet service is available, it too is often unreliable and undergoes frequent outages. Just two weeks ago a friend who lives within line-of-sight of a cell tower on the Columbia River near Kettle Falls experienced interrupted service for both cell phones and the internet. The outage lasted for several days.</p> <p>The instability of the communication networks here in Eastern Washington are perhaps incomprehensible to those who live in the highly populated regions along the urban coast of our state. But I assure you that we here in the east STILL NEED LANDLINES. It is incredibly frustrating to be in the minority and to have our views regularly steamrolled by the</p>

			<p>west coast megatropolis, but this goes beyond anything we've experienced before. It feels like an insidious attempt to rob us of a very essential and basic requirement for first world living--emergency and everyday communication capabilities.</p> <p>Will you reduce portions of Eastern Washington State to third world status? I ask that you resoundly reject any attempt by Centurylink to shirk its duty in maintaining this essential service for the citizens of Eastern Washington.</p> <p>Thank you,</p> <p>Mistie Ames</p>
	Senator Shelly Short	E-mail	<p>Commissioners,</p> <p>Please accept the following comments for the record regarding Docket UT-240029 (Century Link’s Petition for Competitive Classification).</p> <p>I represent the Seventh Legislative District, an area that now encompasses twenty percent of the land mass of Washington State comprised of all or portions of Chelan, Douglas, Ferry, Okanogan, Pend Oreille, Spokane and Stevens Counties. The majority of my district is mountainous, rural and remote with an average per capita population of 25 people per square mile. Wildfire risk is something my constituents prepare for just as they also prepare for potentially harsh winter conditions. As such, access to emergency communications for safety is critical.</p> <p>I have grave concerns with the uncertainty this petition, if approved, would create for folks who truly do not have viable, reliable options beyond land-line service. As a result, I am registering my opposition to Century Link’s Petition and request that the UTC maintain the regulatory oversight it currently has over this incumbent provider. I also ask the UTC to discern who these 800 customers are that Century Link has identified and to question the information used to identify the same. Further, it would be interesting to see a regional-type map of those customers to determine the areas most impacted by this petition.</p> <p>While I certainly understand that the advent of wireless telecommunications has allowed for greater mobility, access and reliability for a large majority of Washingtonians, the topography in many areas of my district does not make wireless telecommunications a viable, reliable, cost effective, user-friendly replacement of landlines.</p>

			<p>Throughout my time in the legislature, I have understood the critical oversight role that the UTC has regarding consumer protection, including cost of service. Your role in this matter is more important than ever to fight for and ensure that all of these Century Link customers who find themselves without options are protected and can continue with landline service, a service each relies upon for reliable, everyday and emergency communication with the outside world.</p> <p>My constituents know first-hand that wireless service is not reliable. They do not need Century Link making potential decisions to discontinue landline service by relying on off-site, analysis that is not grounded in the real world that my constituents and others live in. I do understand the changing market dynamics, however those dynamics should not be borne on the backs of those that have no other telecommunications options.</p> <p>In closing, I urge the UTC to continue with its regulatory authority and to deny the Petition.</p> <p>Shelly Short</p>
	Beatrice Lackaff	E-mail	<p>To the Washington State Utilities and Transportation Board:</p> <p>My husband and I live in rural Klickitat County, in an area that is timbered, and cut by many canyons; this area is challenging for utility service providers.. Virtually everyone who lives in our area is dependent upon CenturyLink for landline phone service, and many to most are also dependent on CenturyLink for the limited internet connection that we can get from them. We ARE a "captive customer base", and we "have no reasonably available alternatives" to using CenturyLink. Believe me, NO ONE here would use CenturyLink if there was an alternative service available!</p> <p>Their service is poor and their customer service clearly shows that company policy considers us rural customers as too much trouble to serve, and not profitable enough, even when they only provide at best, minimal support. CenturyLink built their infra-structure here with public money, but provided the general public with no benefit. Their rates have been steadily rising as their service and customer service steadily decline. I firmly believe that if it were not for the public interest WUTC commission protecting us - CenturyLink would drop their unprofitable rural customers like hot rocks - leaving us without the vital and lifesaving ability to reach out to one another, to work, attend classes, manage our healthcare, and get help in case of an emergency.</p> <p>Last week a beloved family member suffered a massive heart attack, but had the presence of</p>

			<p>mind to call 911. The EMTs arrived within minutes- they stabilized the patient and communicated with area hospitals and Life Flight crew, and delivered him to appropriate hospital cardiac care 70 miles away within half an hour. The doctor assured us that his quick successful call to 911 saved his life. Now he is home and totally dependent on his landline based Medic Alert alarm system to be able to continue living in his own home.</p> <p>Many of us here in rural Washington State literally depend upon CenturyLink as our SOLE phone and internet provider. We call on the WUTC to protect us by DENYING CenturyLink's petition to falsely declare themselves a "competitive provider"</p> <p>Thank you for hearing me. Sincerely, Beatrice Lackaff</p>
	<p>Hugh & Charlotte Jones</p>	<p>E-mail</p>	<p>To Whom it Concerns,</p> <p>We are on a fixed income, wife dealing with cancer, I with heart problems, we rely on our land line phone provided by CenturyLink for both emergency & medical provider needs, as well as personal business & contacts.</p> <p>This CenturyLink service is the only provider for this and for internet access available to us. Unless we have the continued protection of the W.U.T.C. to monitor and regulate CenturyLink there is a grave risk the rates will skyrocket, and the service will suffer, leaving us suffering financially and leaving us vulnerable to both safety and medical needs. Please reject their Docket UT-24009 petition and continue to protect the citizens of Washington State.</p> <p>Yours, Hugh & Charlotte Jones</p>
	<p>David Feldberg</p>	<p>E-mail</p>	<p>I do not approve of any rate increases by them.....</p>
	<p>Karin Ashton</p>	<p>E-mail</p>	<p>this is written in reference to public comment on service provided by Century Link. Century Link is requesting adjustments to its current processes in provided service to Washington State customers. I wish to comment on recent service provided to the business I operate in Clallam Bay, Washington.</p> <p>In the first week of March, 2024, a request was made by Clallam Bay/Sekiu Visitor Center to Century Link. The request was made as a result of a move of location two doors down from the previous service address. We are now at 16713 Highway 112, we were previously on the same side of the highway.</p>

			<p>Over the course of the month of March, we made six requests for transfer of service to our new location. Each time a volunteer was stationed at the new location as requested. Each time service was not provided, no information given to indicate when it could be expected, we were left waiting from 9 am until 5 pm. there was no notification of service cancellation. When the technician finally did arrive at our location, he said he had cancelled two appointments to get to us and that he would do no more that day, we were his last appointment.</p> <p>In short, we waited a month and a half and were promised repeatedly by a variety of people for whom English is not their first language that our technician would be there. Yeah, he finally did show up and when he walked in the door I told him I didn't know whether to let him in or punch him in the nose.</p> <p>Century Link has had a hold on our area of Washington State for some time and its treatment of its customers out here is pretty bad. In taking a random survey of service in our area I heard of several people who had had the same issues I did with waiting to be hooked up, no internet, no phone, phone still not right and so forth...I hope if the state considers the application of Century Link that it also recognizes the needs of the customers served. So far we've been getting the short end of the stick.</p> <p>Karin Ashton</p>
	Keith & Barbara Ladderud	E-mail	<p>I recently received a Notice of Virtual Public Comment Hearings - Published March 22, 2024 CenturyLink Petition for Competitive Classification, I am providing my comments.</p> <p>First off, I tried the online link for online comments and it get back page not found.</p> <p>My comments are as follows:</p> <p>Where I live, cell phone coverage is spotty at best. We have compared carriers with the neighbors and they all are about the same. Not great. To be able to get a cell phone to work well in my home, we have to have it connect through WiFi. We currently have Comcast. With a change, it will require us to keep a cable provider for WiFi to be able to have a phone.</p> <p>Now if the cable goes down, or the power goes out, the cell phones won't work. I have experienced this several times int the past. Also, certain power outages also take out the cell phone towers as well.</p> <p>Because of all of this we have kept our CenturyLink landline.</p> <p>So allowing CenturyLink to change would not work well for us.</p>

			Keith Ladderud
	Kathryn White	E-mail	<p>Hello,</p> <p>CenturyLink has petitioned and requested the Washington Utilities Trade Commission (WUTC) to classify CenturyLink as Competitive Telecommunications Companies. I request that this classification be denied as CenturyLink is the carrier in Seattle, its surrounding areas, and probably in all of Washington State that provides reliable internet and landline service over copper wires (which also allows alarm systems to run over the same copper lines).</p> <p>CenturyLink has a monopoly of wired, landline, copper wire provided services, there are no other wired, landline, copper wire alternative service providers, and it has a significant captive customer base for these services as well as for other types of communication services as it has been the prime telephone and internet service in these areas for years.</p> <p>There is no other company that is providing phone and internet services over copper wire, all the rest are using wireless (which CenturyLink provides as well).</p> <p>If CenturyLink is classified as Competitive Telecommunications Companies there is a great likelihood that it will substantially increase the rates, reduce their maintenance, and/or eliminate its copper wire services and force customers to go with wireless services for phone and internet (which also means wired, landline alarm services will need to be changed as well).</p> <p>There are many people, including myself, who do not want to lose their wired copper wire landline phone and internet service as these ensure customers are safer as they have phone service, alarm service, and internet service when there are power outages (which occurs several times a year).</p> <p>We feel safer knowing we have this access when power goes out AND we don't need to buy or rely upon a backup battery that may or may not work for backup power supply (besides the expense and the negative environmental impacts of manufacturing, replacing, and using batteries).</p> <p>Also, it makes more environmental sense to diversify and have wired, copper wire, landlines available as this ensures there are some people in the neighborhoods that have phone, internet, and alarm availability with power outages.</p> <p>In addition, copper wire, wired, landline services don't use electricity (and the use of electricity will be substantially rising in this area as population grows and as more people switch from gas appliances, gas heaters, gas water heaters, gasoline vehicles, etc. to electrical ones). With the decrease in snow pack due to climate change and the increase in electricity demands as time goes on, having alternative ways to provide phone, internet, and alarm</p>

			<p>systems is crucial.</p> <p>Furthermore, many elderly people are more familiar, comfortable, and trusting of wired, copper wire landlines.</p> <p>Please ensure that CenturyLink continues to operate under an Alternative form of Regulation, a form of limited regulation that keeps it subject to certain regulations that ensure reliable wired, copper wire landline services and reasonable rates for these services.</p> <p>Please do not allow CenturyLink to discontinue its wired, copper wire, landline services in the Seattle metro area as well as in the rest of Washington State. Please ensure the rates remain as is.</p> <p>The WUTC must issue its decision about whether to grant CenturyLink's petition by July 8, 2024.</p> <p>Please lend your power and voice to maintain CenturyLink's current classification and ensure the maintenance, existence, and reasonable costs especially for wired, copper wired, landline phone, internet, and alarm systems that use the copper wire landline phone lines.</p> <p>Please reply in how you will be responding to this issue.</p> <p>Thank you for your prompt attention to this matter.</p>
	Jetta Hurst	E-mail	<p>External Email</p> <p>I am against deregulating Century Link in anyway. They treat customers very badly now, I cannot imagine what they would do if they get what they want. They have lied every time I have communication with them. They make phantom appointments. They do not let costumers know anything ever. They pretend they are working on fixing cables with no repair truck or employees anywhere in the area. They send bills when you have no service. When you call to let them know you received a bill and the landline has not worked all month they say they will remove charges, but you receive a bill without the charges removed. They bill the same taxes three times on that bill then state the FCC makes them do it (see attached) I have spent countless hours on hold and having pointless conversations with employees that accomplish nothing. I discovered my landline was not working 3/8/2024. It is still not working. I like having a landline and am willing to pay for it. If I had an option to use another company I would but non exist. All others are connected to the internet in some way. I do not want that. I and many people I know, just want a regular landline. I get my internet in other ways. Please help with this situation not make it worse.</p> <p>Thank you. Jetta Hurst Frustrated consumer</p>

pkkirby@comcast.net	E-mail	<p>I am writing to oppose CenturyLink’s petition to be classified as Competitive Telecommunication Companies. Washington’s landline utility is divided into areas served by a single company with a captive customer base. I disagree with CenturyLink’s position that there are reasonable alternatives to landlines. Landlines are an older technology, but still have some definite differences and advantages over cellular/digital technologies including their role in landline-based security systems. Allowing CenturyLink to discontinue service without WUTC approval would create a hardship for affected customers.</p> <p>As a longtime CenturyLink landline customer, I believe that their customer service is the worst I have ever experienced from any company. I currently have a landline in Seattle which has been out of service for more than 5 months. CenturyLink diagnosed a fault in the line some distance from my residence, but have not repaired it. They have scheduled over 15 “repair appointments” and sent multiple reminders with each one that I must wait on-site for their technicians to arrive, but none have ever come. I have waited for a total of over 100 hours and my line is still broken. I have attempted to work with CenturyLink customer service (customers are not permitted to contact the Repair Team directly) and got some helpful information from the Customer Advocacy Group, but CenturyLink has now discontinued the Customer Advocacy service. I learned that repair services are “extremely backed-up” and that they would get to my repair when they can, with no possible time line of when that might be. CenturyLink has allowed their repair schedule to become so backlogged that a routine repair cannot be done in 5 months while still nominally being regulated by WUTC. Further reducing WUTC regulatory oversight will almost certainly be bad for Washington landline customers.</p>
Will Mengarini	E-mail	<p>Please deny the CenturyLink Petition for Competitive Classification.</p> <p>At my zip code of 98105, the SOLE PROVIDER of wired landline service independent of both Internet and building electricity (i.e POTS, aka "Plain Old Telephone Service") is CenturyLink.</p> <p>CenturyLink is a monopoly, not a competitive service.</p> <p>I will not be able to attend the online Zoom meeting ("Virtual Public Comment Hearing") on this subject; please accept this email as my comment on the matter.</p>
Dennis & Mary Anderson	E-mail	<p>Comments in regards to CentruyLink Classification Petition</p> <p>Docket Number: UT-240029</p>

		<p>CenturyLink has filed a petition with the Washington Utilities and Transportation Commission (UTC) seeking competitive classification pursuant to RCW 80.36.320 and WAC 480-121-061.</p> <p>I would encourage the UTC to deny their petition. CenturyLink is the largest telephone company in Washington, many citizens rely on their services, land lines as well as internet access.</p> <p>I received their NOTICE OF VIRTUAL PUBLIC COMMENT HEARINGS – Published March 22, 2024 in the April Billing. In this notice CenturyLink explains the reclassification can take place when customers have reasonable available alternatives and the company does not have a significant captive customer base.</p> <p>In light of the many, multiple day outages since February 2024 I don't believe CenturyLink has its customer's best interest in mind. I believe the outages are done deliberately to encouraged customers to find alternatives.</p> <p>I realize the UTC only oversee TELEPHONE land line and not internet but they provide both so when one is down they are both down.</p> <p>IF and when CenturyLink is allowed to quit serving the rural areas of Washington for land lines there needs to be more cell towers with back-up power to serve those areas. If the power goes out so does the local cell tower you are putting thousands of lives at risk in the event of an emergency.</p> <p>The only alternative to land lines provided by CenturyLink is Cell Phones, I realize most people now have cell phones but service amongst the various providers varies from area to area.</p> <p>For those who do not have cell phones, there can be an upfront expense to purchase a cell phone and a more expensive plan may be needed to get cell coverage where they live. There are still areas where there is NO cell coverage. So is that really a reasonable available alternative?</p> <p>I interpret their petition to be a plan to quit serving rural areas so they don't have to upgrade their equipment and service lines. And the real bonus for CenturyLink would be their rates would then be governed by the free market.</p> <p>Please consider the impact your approval of this petition would have on so many residents of</p>
--	--	---

			<p>out-lying areas.</p> <p>Thank you.</p> <p>Mary Anderson</p>
	Dawn Stover	E-mail	<p>To Whom It May Concern:</p> <p>I am writing to comment on the CenturyLink petition for competitive classification, docket number UT-240029.</p> <p>There are two CenturyLink telephone landlines in my home, and my husband and I have relied on them for business and personal use for 32 years.</p> <p>In the past, we also found our landlines useful during power outages or other emergencies. For the past few years, however, our landlines have gone dead within minutes of the onset of a power outage, because CenturyLink no longer maintains the battery backup that previously provided residual power through the phone lines. There hasn't been much we could do about this, because we are a captive customer base—no other companies offer landline service in our area.</p> <p>In the past few years, we have also had frequent outages of our phone service, and not all of them have been caused by power outages. Sometimes it's construction work down the road, but many times there is no explanation whatsoever. It typically takes days or even weeks to get a service call. It seems obvious to me that maintenance of the infrastructure is declining as fewer and fewer people continue to subscribe to expensive and unreliable landlines.</p> <p>Still, as bad as the CenturyLink service has become, we do not want to lose it!</p> <p>We first became aware of the threat to our service when a neighbor told us that a CenturyLink repairman had said the company was planning to stop maintaining the landlines in our area. And then I happened to see something in the fine print at the end of a recent CenturyLink bill, where there is a Notice of Virtual Public Comment Hearings that customers are extremely unlikely to read unless it's called to their attention.</p> <p>The notice says CenturyLink has petitioned to be reclassified as "fully competitive and subject to even fewer regulations." If the company's petition is approved by the WUTC and</p>

FCC, CenturyLink would no longer be required to get WUTC approval to discontinue service in our area or to raise our rates.

That would be a BIG problem for people like me who don't have sufficient cell signal at our houses to switch to mobile service. My husband and I live in a cellphone dead zone, thanks to the topography.

Some of my neighbors have been able to replace their landlines with Starlink's satellite service, but the satellite internet service that my husband and I subscribe to (HughesNet) doesn't work well for voice calls. It is data-capped and has a signal lag that makes it difficult to have real-time voice or video conversations. Switching to StarLink would require a big upfront investment, a completely different dish mounting system, and the removal of trees on our property for a better line of sight. Currently, it is not a feasible option for us.

CenturyLink's notice claims there are about 800 customers "who have only satellite and landline options for voice service." I'm not sure how they are defining "customers," but it probably means the number of landlines they serve, rather than the number of people depending on those landlines, which is likely to include additional household members in many cases.

In any case, it is disingenuous of CenturyLink to imply that all of these customers have a satellite option for voice service. Geostationary satellite services like HughesNet may be classified as "broadband" based on their speed, but they do NOT provide the kind of real-time, unlimited service needed for meaningful and non-annoying communication. They suffer from a problem called latency, because signals must travel far into space and back again before they can reach the person on the other end of the connection, which results in long pauses and frequent interruptions in any voice or video call. It's beyond awkward.

I'm a journalist, and I often need to interview people by phone for my work. Losing the landlines in my home would make it extremely difficult for me to conduct phone interviews, a key piece of my work.

As mentioned above, some people in my community have been able to obtain voice service through workarounds such as cellphones or StarLink satellite service (which uses satellites in low Earth orbit, where signals don't have to travel as far as they do with geostationary satellite services like HughesNet). I'm happy for those neighbors who have found workable alternatives to CenturyLink landlines, but that still leaves me and many other neighbors without a fix. And some people who might have a satellite option available can't afford to

			<p>pay for a service that typically costs twice what they pay for a landline, so they will be left with no options whatsoever. That is a terrifying prospect for elderly people living in an area where it isn't easy to summon help by other means.</p> <p>In short, my husband and I do not have any reasonably available alternatives to CenturyLink landlines, and we are not alone.</p> <p>Please don't give CenturyLink permission to take away our service or begin charging us exorbitant rates.</p> <p>Sincerely, Dawn Stover</p>
	Beatrice Lackaff	E-mail	<p>Please accept, below, as a written comment, a letter I have written to 20 of my neighbors, as a cover to the helpful message sent to me by your Public Involvements Department.</p> <p style="text-align: center;">*****</p> <p>Hello my Friend, living in rural Klickitat County-</p> <p>Do you know that CenturyLink is petitioning the WA ST Utilities and Transportation Commission (WUTC) to be RECLASSIFIED from "sole provider" to "competitive provider" -- which if successful means they would be subject to LESS regulations and would be free to DROP and/or RAISE RATES on their rural customers AT WILL?</p> <p>We rural customers are regarded as too expensive anyway, and always complaining about worsening service and raising rates. I believe CenturyLink cares nothing for their rural customers' well-being, and would be happy to drop us. I think this is a grave threat to the safety and well-being of thousands of rural residents throughout Washington.</p> <p>The WUTC is taking this petition seriously, and will hold their second public comments hearing this Thursday, June 06 - see below how to add your voice so that the WUTC will not believe CenturyLink's assertion that they do NOT have "a significant captive customer base." If you, or family or friends, are served by CenturyLink (many of us cannot receive or afford Starlink or other services - or they aren't appropriate for our location.), consider the impact of losing phone and internet service upon your lives. Please use one of the methods in the message below to tell the WUTC that we do NOT have reasonable and affordable alternatives to CenturyLink's service. You can CALL IN your comments to 1-888-333-9882,</p>

			<p>as well. I have found the WUTC to be (so far) genuinely helpful in participating in this process. Their Public Involvements Office seems committed to helping the public.</p> <p>I attended and spoke up at the first Public Comments Hearing on Docket UT 24-0029 on May 16. Only 10 or so people from all of rural Washington testified and the hearing was over in about 1/2 an hour. I am afraid this feeble pushback from the largely unaware CenturyLink rural customer base might not be enough to be heard over the money, lawyers and gravitas of CenturyLink. There is still time to enter comments before and hopefully during the WUTC June 06 hearing.</p> <p>Comments WILL be taken until July 19, the day of the final "hearing" with lawyers and judges, and WUTC Commissioners, and testimony from businesses and small ISPs. There will be more impact to your comments if made by June 06, as they will become part of a record or packet. If that's too soon for you, please still make comments by July 19 - as every voice will be heard to help save the lifeline of phone and internet service for many rural Washington families.</p> <p>There is more information, and links to CenturyLink's "announcement" from their own website on the Snowden Community Council website,. snowdencommunity.org. (part way down announcements in middle of homepage)</p> <p>Thanks for helping out and spreading the word and speaking up so the WUtC will protect us from being further abandoned and/or robbed by CenturyLink.</p> <p>Your neighbor,</p> <p>Bea Lackaff</p>
	Ken Bender	E-mail	<p>I DO NOT HAVE ANY OTHER OPTION THAN CENTURYLINK FOR BROADBAND COMMUNICATIONS. I AM A CAPTIVE CUSTOMER.</p> <ul style="list-style-type: none"> • - StarLink satellite internet is not reliably available in this area. For example, at my home there is not a clear enough view of the sky according to StarLink to offer uninterrupted service. • - NONE of the cellular carriers operating in this area offer any sort of Cellular Home Internet service. ALL the carriers allow only a very limited number of GB's for mobile hotspot tethering before they reduce your rates to 1G cellular data (approx. 2.4 Kb/s). • - CenturyLink is arguably NOT effectively servicing their customers nor are they investing in their facilities to ensure that the residents have reliable service. I don't know

			<p>how I'm going to be able to get my service restored, but the idea that I might have to rely on 'market-based mechanisms' to do so with CenturyLink classified as a competitive carrier is disconcerting to say the least.</p> <p>It is completely laughable to classify CenturyLink as a 'Competitive Telecommunications Company' and that they should be granted forbearance or otherwise made exempt from certain regulatory obligations.</p> <p>I do not support reclassifying CenturyLink as a 'Competitive Communications Company' and relieving them from regulatory obligations that they aren't fulfilling in good faith today.</p> <p>Sincerely,</p> <p>Ken Bender</p>
	Juris Sarins	E-mail	<p>CenturyLink has file a petition, UT-240029 to for Competitive Classification of certain Copper telephone landlines.</p> <p>Our residence falls within the realm of this petition. We have a residential elevator, which must have reliable communication to summon help if a person(s) would become trapped due to a mechanical failure. We have no alternative means of communication, as cellphone signal at this location is no-existent. Any Wi-Fi calling option is also subject to the same issue, as signal for that is supplied by the same lines as the voice telephone. Alternative Wi-Fi, derived from satellite internet, has been found to be sporadic and un-reliable, thus not a viable option to preclude a potential fatality.</p> <p>Based upon this, I strongly oppose the petition.</p> <p>Juris Sarins</p>
	D. Olson	E-mail	<p>Snowden community relies on Centurylink. If they are allowed to choose who can be eliminated from service, residents will not have any communication avenues. The only other choice is Starlink and that is dependent on there being free line of sight. It is often</p>

			<p>prohibitively expensive. Snowden community relies on Centurylink. If they are allowed to choose who can be eliminated from service, residents will not have any communication avenues. The only other choice is Starlink and that is dependent on there being free line of sight. It is often prohibitively expensive.</p>
	Fred Greef	E-mail	<p>CenturyLink is petitioning the Washington Utilities and Transportation Council (WUTC) to change their current classification as a “sole” phone and internet provider to being classified as a “competitive” provider. This is a terrible idea and totally unfair to all of us underserved rural residents in Washington State. CenturyLink is the only option for many rural customers in this state. There is no competition in many rural areas such as my community. These are the very places the government should be helping get more service, not take it away. CenturyLink should not be allowed to take away our phones and internet. In more urban areas where there is competition, maybe that is where you can consider allowing service cuts.</p> <p>Government should be helping those citizens most in need of essential schooling, elderly, and basic medical human services that all depend on telephone and or internet access. To deny both phone and internet to citizens who have no other options is simply wrong and should be illegal. During covid there was no in-person school and our children could not be schooled without the internet. This is why we have a government and a UTC. Government should be looking to assure equal education opportunities for all children and improving internet access in rural areas, not removing it. Washington state does not even allow me to file taxes via hard mail any more. Internet becomes more essential all the time.</p> <p>CenturyLink is the only provider in my community. I live at 249 Bates Rd, White Salmon, WA. They have absolutely no competition here. There are simply no reasonable alternatives for phone and internet service here. Cell phones simply do not work here regardless of provider. There are a very few isolated spots where you might get "one bar," or even 2 at times in our community, but not consistently, and not near any houses.</p> <p>We live in fire country. Our very lives may depend on telephone or internet fire warnings. One neighbor had a recent medical emergency and would have died without the CenturyLink landline telephone.</p> <p>CenturyLink should never be allowed to drop rural Washington State residents from service. They use fiber optic lines that were government subsidized to serve rural communities. They should not be allowed to abandon us now, especially after taxpayers subsidized this service that CenturyLink uses. Rural citizens deserve some of the same government services as urban residents, especially basic human needs when our children's school and our very lives may be at risk with no other phone or internet options.</p>

			<p>Pricing should not be allowed to skyrocket either, especially where there is absolutely no competition or other providers available. Do not push rural citizens back into the dark ages so that CenturyLink can increase their profits. Please be reasonable and fair in this case. I am almost certain that the vast majority of rural residents who will be most impacted do not even know this is happening. We depend on you guys to do what is right. Thank you for listening.</p> <p>Sincerely Fred Greef</p>
	JoDean Sarins	E-mail	<p>Docket UT-240029</p> <p>I strongly oppose this petition. I live in an area where cell phone coverage is spotty and inconsistent at best. If an emergency arose, there is no reliable way of communicating without a wired line. I also run a business out of my home, because of the inconsistency in the cell phones, I am forced to use a landline to communicate with clients. Please consider this information in your decision making.</p> <p>Jo Dean Sarins</p>
	Kate Richardson	E-mail	<p>I'm Kate Richardson, a 76 year old, living alone in Burien. I've had an uneven relationship with CenturyLink since it took over from Qwest. Currently I am on a 'price for life' program, any change will raise the monthly by at least 25\$, though I have nothing in writing spelling out any conditions. I get a land line and high-speed internet. Nonetheless, I am very hesitant to consider any other company. Where is the market? How do I make comparisons? I get adds from the big companies usually bragging about 'no contract', which leaves customers with no assurance as to what to expect. And they probably don't have land line capability. At least if I sit tight my rate with CL shouldn't rise.</p> <p>I prefer land line to cell phone. I have an answer machine and several phones in the house, so I can easily answer a call, don't need to wonder where I left the cell last... In a coat pocket? in the car? I don't want to have to purchase pricey new equipment every few years - I haven't had to get another phone for several decades.</p> <p>I don't need to worry about the phone being charged up though, while changing my internet service several years ago, CL connected my land line to the data line without telling or asking me. That means if the power goes out the phone doesn't work. Was that allowed by the UTC? I might not have made the change had I known.</p>

			<p>I don't text. I used the cell during covid to advise Fred Meyer when I was ready to pick up groceries. I take it in the car in case of some kind of mishap. That's about it.</p> <p>Evidently CL intends to stop providing land line service if you let them. I object to this. Where is my alternative? Why do these slick corporations get to function without any regulations? Is your interest in their profit, or customers' needs?</p>
	Fred Greef	E-mail	<p>CenturyLink claims as part of their proposal that they will protect 800 of us Washington State citizens who are CenturyLink customers with no other telephone options other than satellite or CenturyLink landline. This is a really bogus claim that must be investigated.</p> <p>If cell phones do not work on your property, does that mean you are one of only 800 people statewide that they have to protect? What if the true number is 100,000? How did they arrive at this number? How can it be verified or enforced, with even less oversight than they have now? How do we protect those who truly have no reasonable alternatives, but are not on the secret/hidden CenturyLink list of 800? Is there a legal remedy?</p> <p>Can CenturyLink be legally required to share this secret list of 800 with all of their customers, so all those with no voice option (other than CenturyLink landline), can weigh in before there is a decision made on the Century Link proposal? Can we at least get verification now if we are on the list, or if our service area is covered before this UTC decision is made? It sounds to me as if they need more oversight, not less. People have a right to know how this proposal might affect their only life support system, if they have no other phone service option. Cell phones do not work on our property or most of our neighbors unless they have somehow found an expensive satellite connection.</p> <p>I am fairly certain the vast majority of CenturyLink customers do not even know about this proposal yet. The WA UTC will certainly hear about this when people are cut off and find out what CenturyLink did to them. At that point the UTC may have very little power to help us. Please let us know if we are on the CenturyLink list of only 800 customers that they promise to protect statewide. This sounds like a meaningless and very misleading promise. I hope you can help protect those of us with no other telephone option who are not on that list.</p> <p>Sincerely, Fred Greef</p>
	Norma Fried	E-mail	<p>My husband, Dorn Campbell, and I both oppose any notion of allowing Century Link to be classified as a "Competitive Telecommunications Company." Or any other changes that</p>

			<p>would degrade the current delivery of telecommunications, including the current rural districts.</p> <p>Further the delivery of such services should really be considered as a necessary utility and not a commodity to be governed by the “free market.”</p> <p>Thank you.</p>
	Chris Connolly	E-mail	<p>I don't understand how Centurylink can claim that they have competition. For decades they have been the only phone service available to us in rural Klickitat County. And now it is the only way for us to also have the internet. I know we could pay \$100 a month to some private provider for the internet but we also don't have cell service up here. I know we can use our cell phones through WiFi but we need an internet connection to do that. Centurylink in fact has had us over a barrel with their fees and lack of available recourse when something is not right. So no it does not seem Centurylink has any competition, allowing them to do pretty much do what they want when it comes to service and charges.</p> <p>Please do not allow Centurylink to do whatever they want without any oversight of their behaviours and allow us to enjoy the protection that government oversight can provide. That oversight would at the very least grant us some avenue of recourse when we feel we are being wrongfully treated by the only phone company available to us.</p> <p>Thank you for you attention Chris Connolly</p>
	Russell M. Blau	E-mail	See Attachment
	Laura McCarty	E-mail	<p>I am writing to let you know of the difficulties the UTC has caused for older folks who need phone service and cannot understand VOIP and other internet based or cell phones. My mother is an older person w/language difficulties and now has to deal with internet and other technologies that she doesn't understand just in order to speak to her friends. She has no computer. She has no email. This is a TERRIBLE and biased decision toward the phone companies and away from people. I think the UTC should REQUIRE landline service so that folks who are older, or have language difficulties or are not tech savvy can communicate with their doctors, friends, family. Yes. Centurylink said they have no legal requirement to offer simple landline service.</p>
	Mariam Goldfarb	E-mail	<p>We have been without CenturyLink/Lumen landline telephone service since early morning on Wednesday, January 31, 2024. We were informed that this is due to copper wire theft from the telephone line down the street from us. CenturyLink/Lumen has done a poor job maintaining the telephone lines.</p>

			<p>We have not had any recent updates as to when our landline telephone service will be restored, and the corrective measures that CenturyLink/Lumen is going to make to the telephone line on our street to prevent this from happening in the future. In addition, there are branches on the telephone line that should be removed from the telephone line.</p> <p>I filed a complaint with the Washington Utilities and Transportation Commission. Last year I filed a complaint with the WUTC regarding another issue with CenturyLink/Lumen. Over the years, we have filed several complaints regarding our landline service with the WUTC. The customer service is almost nonexistent at CenturyLink/Lumen and it is difficult to impossible to contact employees there and get resolution to problems.</p> <p>We need the continued assistance from WUTC. We greatly appreciate the help we have received from the WUTC.</p> <p>If the oversight of CenturyLink/Lumen were to be weakened as they are requesting, the consumers and citizens of the State of Washington will suffer tremendously.</p> <p>I would like to discuss this further with someone from your comment group at WUTC. Please email me to set up a phone appointment with someone from your group. I can be reached on my cell phone 253-514-1776.</p> <p>Thank you,</p> <p>Miriam Goldfarb</p>
	Patrick and Rhonda Fallon	E-mail	<p>Washington Utilities and Transportation System:</p> <p>We are contacting you in response to CenturyLink's petition for a reclassification change to a Competitive Telecommunications Company. As a 45-year resident of Clallam County in Sequim, Washington we are located in a rural, mountainous community. Our residential phone service is supplied by Century Link. Our Century Link phone service is our only means of telecommunication service at our residence. We live in the Lost Mountain area of Sequim and have no cellular capability at our residence. We have had our residence electronically surveyed for cellular signal capability by Verizon, AT&T, and Star Link, all of which failed for cellular service reception. We own cell phones, but are unable to use them at our residence because of this. We must leave our home and travel some distance toward the city of Sequim before our cell phones are able to access cellular reception.</p>

			<p>The serious lack of alternative non-cellular telecommunication services was recently brought home to us when CenturyLink phone service failed in the Lost Mountain area for 14 consecutive days in February of this year (2-8-24 thru 2-22-24). As a result of this long outage, we and many of our Lost Mountain neighbors were deprived of non-cellular phone service for 14 consecutive days. A significant percentage of the people affected by this outage, including us, are senior citizens with an acute need for reliable telecommunications service for access to medical and emergency services. Based on the many serious complaints we heard from our senior and non-senior neighbors during the long outage, we are not alone in our dependency on reliable non-cellular phone service. That outage caused a lot of worry and stress for us and our neighbors and highlighted the fact that we are a captive customer base for CenturyLink.</p> <p>In conclusion, we request that Century Link’s request be denied on the grounds that they are the only viable supplier of non-cellular phone service in our rural, mountainous area, where cell service is unavailable and/or unreliable.</p> <p>Thank you for your consideration.</p>
	Valerie Sammons	E-mail	<p>Hello,</p> <p>I am an 88 y.o. retired RN who still uses a landline as my primary connection to the outside world. I have had this phone since I moved into this house in 1988. I can remember my phone number because I have repeated it so many times.</p> <p>I have a Tracfone cell phone but I frequently misplace it. It has a new number which I cannot remember. Because of memory problems stemming from the advances of old age and the residuals from a recent stroke, I often have difficulty finding where I last left my cell phone. I also have difficulties figuring out how to use my cell phone for the same reasons.</p> <p>However, I believe that my landline was a godsend during the time of the stroke. I was sitting next to it when the stroke began. I recognized what was happening. I reached over, picked up the phone and dialed 911. I dragged myself into the living room and undid the front door. Then I sat in a chair and waited until the crew arrived.</p> <p>As a result I got to the ER more quickly. I believe that the treatment there lessened the effects of the stroke.</p>

			<p>If I had had to search for my cellphone, the whole scenario would have taken much longer with greater resultant brain damage.</p> <p>When cell phone service is interrupted my landline still works. Many other elderly people are in the same situation.</p> <p>The monthly cost of my bare bones landline has been slowly going up. It is now \$50.95. As a low- fixed-income person I struggle to keep up with inflation.</p> <p>Please continue to regulate companies such as Century Link</p>
	Nancy Kirner	E-mail	<p>Dear UTC,</p> <p>I am a business customer of Century Link, as I receive telephone and internet through CenturyLink in Twisp, WA 98856. This past summer, Century Link initiated a "repair" to our phone and internet service that resulted in no service for at least 10 days. If there had been an alternative to CenturyLink, I certainly would have signed up for that alternative service. There is no provider who can deliver the speed and reliability (when they don't fix something that wasn't broken) that we pay dearly for with Century Link. Alternatives we have tried, but their services have been intermittent.</p> <p>We look forward to having fiber internet as part of the federal infrastructure bill, but right now, there is no alternative. Please delay or deny their request for Competitive Classification until an alternative is truly available.</p> <p>Thank you, Nancy Kirner</p>
	D Knobel	E-mail	<p>WUTC</p> <p>Inspite of our dismay at the ever increasing rates, we have continued our landline with CenturyLink. As retired we have limited funds but also an increased reliance on having access to emergency aid when there is a disconnect from cell services during storms and other distasters. I cannot imagine what de-regulation will do to future rates.</p> <p>Please do not leave the only alternative during cell outages to be sending a letter via the post.</p> <p>D Knobel</p>

	Bora Akyol	E-mail	<p>WA State UTC Staff and Commissioners:</p> <p>I am sending this email to recommend that the commission does not approve the request by CenturyLink to be classified as a CLEC.</p> <p>I live in North Kitsap county in between Hansville and Kingston. Our options for telecommunications are very very limited and costly. For example, Kitsap PUD has given me a quote of \$7000-10000 for connecting our house to fiber not including \$1800 of trenching costs that are additional. Starlink is \$500 for the dish and \$800 to install. The cellular coverage is also non-existent from all three major carriers. CenturyLink service is the only option available for 911 and other emergencies and their dismal DSL internet provides a backup option for Starlink when it goes out.</p> <p>We have a real problem with reliable telecommunications in our area and I don't think changing the status of CenturyLink to a CLEC from an ILEC is going to help. CenturyLink should be expanding their network with modern equipment to provide better services affordably.</p> <p>Regards</p> <p>Bora Akyol</p>
	Lottie Voller	Phone	I have no interest in a cell phone. My bill is already \$50 with CenturyLink. There are many surcharges and it if it is unregulated it will go up.
	Becky Miles	Phone	Becky Miles. Rural Klickitat county, Snowden. My neighbors all have to depend on CL for their internet. I just happen to be close enough to get another company. Many of them cannot afford to go with Starlink. They will be without internet if CL raises their prices to high. I am calling in on their behalf to say that if CL is the only line they can get short of Starlink they should continue to be a sole provider status. Thanks very much.
	Nora Sheridan	Phone	I have concerns that 911 will be available to use if the filing is approved. I use my landline and need the phone for emergencies. The risk of loosing the use of a landline phone is not good for those incapacitated.
	Anne Gengler	Phone	<p>I'd like to provide some comments regarding CenturyLink's petition:</p> <p>I am not a CenturyLink customer because CenturyLink wasn't willing to provide me service unless I paid to have a cable laid from the nearest county road (Bates Rd.) to my house (approximately 1/4 mile), which was prohibitively expensive. As there are no other cable</p>

			<p>Internet service providers serving my area, my only option for Internet service was a satellite service provider, at the cost of \$190/month, for several years. A couple of years ago I signed up for Starlink Internet service, thanks to having clear access to the northern sky and being able to afford Starlink's Internet service fees (\$120/month).</p> <p>Many of my rural neighbors can't afford Starlink's initial setup/hardware costs (\$600+) in addition to the monthly service fee of \$120/month. Others have heavily forested properties with no clear access to the northern sky. For these people, CenturyLink is the only option for landline and Internet service. I don't see how CenturyLink can portray itself as "competitive" when there's no alternative for many families. To me this is the definition of a "significant captive customer base".</p> <p>I noted in CenturyLink's petition the proposal to "create a class of approximately 800 customers who have only satellite and landline options for voice service". I believe that CenturyLink has grossly underestimated the number of customers in the State of Washington who would fall into this category.</p> <p>Thank you for reviewing my comments, Anne Gengler Resident of Klickitat County, outside the city limits of White Salmon</p>
	Wendy Burley	Phone	Our landline is important to us. Our cell service is horrible and not dependable. We both have had heart attacks and strokes and its important in an emergency. The landline service is a lifeline service to us. Our alarm system for out home relies on our landline service.
	Lottie Valor	Phone	I am opposed to this. I've had this rotary phone for years. I don't need a cell phone, computer, or long distance. I only need my landline, especially for 911 emergency.
	Judy Chrisman	Mail	***SEE ATTACHMENT
	J. Ott	Mail	***SEE ATTACHMENT
	Frank J. Palmer	Mail	***SEE ATTACHMENT
	Ellen Stone	Mail	***SEE ATTACHMENT
	John M. Eyler	Mail	<p>Dear Commission Members:</p> <p>I write in response to the petition by Century Link to be freed from regulation as a public</p>

			<p>utility and to be classified as a competitive telecommunications company (Docket UT-240029).</p> <p>Those of us residing in rural Pierce County in the vicinity of Gig Harbor and relying on land line telephone service have no alternative to Century Link. Century Link has, in fact, a monopoly of that service. Even as a regulated public utility this company has had a poor record of service. In the future, if it were to be regulated solely by the free market, we have every reason to fear higher prices and poorer service.</p> <p>I urge you to refuse to grant Century Link's petition.</p> <p>John M. Eyler</p>
	Melinda Walker	Mail	***SEE ATTACHMENT
	Penny Ruby	Mail	***SEE ATTACHMENT
	J Moser	Mail	<p>RE: ongoing landline phone problems To Whom it may concern;</p> <p>3-11-2024</p> <p>.J. Moser 4612 56th Street East Tacoma, WA 98443</p> <p>I have had no dial tone on my landline phone for the last 8 weeks, since January I 5th, which means no income calls either. This is only the most recent outage. When you call Century Link either to report a problem or ask for an update, you get the "run around" on there automated voice system, then placed on hold for about a total of 15 minutes to get to a live person.</p> <p>Examples of the responses from Century Link live person</p> <ul style="list-style-type: none"> • February 26-2024 said would be fixed by 8 PM that day • March first was told it would be fixed by 8 PM March 4th • Notice a week later I am still without dial tone <p>Brief summation of the more recent past major Phone outages of no dial tone</p> <ul style="list-style-type: none"> • July 11 2022 thru August 8 2022 almost 4 weeks, occasionally worked briefly, not even whole 24 hours • June 11 2023 thru June 17 6 days • July 2 2023 thru 8-10-23 most of 38 days <p>At various times, within I 000-foot radius of my home, while they were working on the</p>

			<p>system, talked with both Century link repair crews &/or their sub-contractors been told over the last 3 years</p> <ul style="list-style-type: none"> • Really old system • Repair parts not made and have to be rebuilt • Most of the "pairs" inside of the existing cable do not work • Century Link does not intend to spend the\$\$\$ to fix the system <p>To further put "salt in the wound", Century Link under WA UTC docket# UT240029, is trying to get out from under UTC oversight.</p> <p>My Info: I am a senior citizen and live alone. This is "my Life Line", consider what that means. I have lived at this address for decades with the same phone line and phone number. In the past. when the "local power" goes out, my land line still worked. I am sure there is a large file of my complaints in the WA UTC system about these ongoing problems, if you care to check.</p> <p>Thank-you for your help,</p>
	James Berg	Mail	<p>Hello, my comment on the request for deregulation of CenturyLink phone service is that it could hurt remote communities that have spotty cell service and a very limited choice of carriers. I have had a land line for years, and it is very dependable during power outages and also forest fires. I have no desire to get a cell phone, and don't use the phone all that much, but it is still reassuring to know that the land line phone is always there and working.</p> <p>Thanks for your time.</p> <p>James F. Berg</p>
	Joy Tucker LaBelle	Mail	<p>Dear Director Killup and To Whom It May Concern:</p> <p>I am a Century Link customer writing in protest of Century Link's request to cease maintaining landlines in the state of Washington (Docket UT-240029)</p> <p>It is my understanding that my home in the South Hill neighborhood of Spokane falls squarely inside Century Link's "study area" for this matter. In other words, if the Commission were to approve this request, my household could lose its landline very soon. I am impaired. I suffer from an immune disorder called Mast Cell Activation Syndrome. It is incurable. My immunologist, Dr. Kerri Drain of Spokane Allergy and Asthma, has given permission to say she can be contacted if you wish to verify my diagnosis. Her practices' phone number is (509) 747-1624; the fax number is (509) 747-6674. Among my symptoms are weakness and tremors in my hands, and a disconnect between why my eyes see and my brain can perceive. The latter crates barriers to suing computer screens for any length of time. Obviously, the</p>

			<p>tiny keys and screen of a cell phone are beyond my physical capacity. I also have a heart condition. With out a landline, I am at a loss to understand how I can call 911 in case of a medical emergency. Over the years since the advent of mobile telecommunications devices, I have been assured(even by CenturyLink employees) that Washington would continue requiring phone companies to provide landlines to the impaired , as well as to rural areas without reliable WiFi access. I urge you to reject Century Link's request to abandon this public service.</p>
	Linda A Spaulding	Mail	<p>DearWUTC:</p> <p>Centurylink says it has applied for Competitive Telecommunications Companies status. It says its rates will be determined by the free market. How many companies are offering landlines? We have had our landline phone number for over 50 years. We are concerned that we could be priced out of having our landline. We want to keep our landline. An employee at Centurylink told us Centurylink wants to get rid of landlines as landlines are not profitable. Will another company provide landlines?</p> <p>Landlines work when cell towers fall over. Landlines work when the power goes out and you cannot charge your cell phone. Not everyone can afford a cell phone. Our power has gone out three times in the last two months. While two outages were relatively short (two hours), one outage lasted 8 hours. A phone can be a lifesaver in an emergency. With climate change there are many more severe storms and fires.</p> <p>Please do not let Centurylink abandon landlines without having another company that can provide landline service at a reasonable price. If Centurylink doubles or triples the price of monthly service, more people will drop the service and it will get more expensive for the people that want to keep their landline.</p> <p>Linda A Spaulding</p>
	Nancy Lewalter	Mail	<p>I don't have any other options living on Orcas. I am emphasizing the importance of keeping my landline and keeping it affordable.</p>
	Melinda Walker	Web	<p>Re: Docket UT-240029</p> <p>Commissioners:</p> <p>I am a CenturyLink customer, and I have been informed that CenturyLink has submitted a petition to the Washington Utilities & Transportation Commission (WUTC) requesting to be classified as a competitive telecommunications company. My understanding is that if this classification is approved, CenturyLink would cease to be regulated regarding rates, contracts or services, and that the company's rates would be determined by the free market.</p> <p>I am writing to ask the commission to NOT approve the requested classification because of</p>

			<p>two major concerns:</p> <ol style="list-style-type: none"> 1. CenturyLink has been losing customers and thus money, so if CenturyLink is reclassified and becomes unregulated, its customers can expect an increase in rates. CenturyLink has let it be known that its focus is on value maximization for shareholders. The approval would be a green light for CenturyLink to raise rates, unfettered by regulatory oversight. 2. CenturyLink has a notoriously poor customer service reputation. Many customers, including myself, have had frustrating experiences when trying to contact CenturyLink's customer service department because they operate primarily as a business with a casual, almost indifferent, attitude toward customer service. Though the WUTC has an informal complaint process, if CenturyLink becomes deregulated and the WUTC complaint process fails, per CenturyLink, a customer would have to use "market-based mechanisms, such as a lawsuit" to resolve a dispute, leaving the average customer without reasonable options for dispute resolutions. <p>In essence, CenturyLink does not respect its customer base, lacks integrity as a service business and is not trustworthy to regulate itself in an honorable manner in a free market environment. Please do NOT approve CenturyLink's request for classification as a competitive telecommunications Company. It needs regulatory oversight.</p>
	Jill Rake	Web	I have no viable alternative for internet connection other than Century Link. To give them free rein to charge whatever they want is unconscionable. They have always provided lousy service, but then to let them gouge those of us that have no no choice is a terrible idea.
	Laurel Cross & David Thies	Web	Re: Docket # 24-0029. We live in a remote area in Klickitat County, Washington. We are senior citizens on limited incomes. Any announcement you may have made was inadequate as we were only able to find out from neighbors. We do not have internet or cell phone reception at our home location. We do not want to lose our land line because that is the only way we can communicate to others from home. Please do not let CenturyLink cancel our land line service.
	Rudy Beyl	Web	<p>docket number UT-240029 To Jeff Killip, Executive Director and Secretary.</p> <p>CenturyLink is not "competitive", has monopoly for land-line phone service providing the phone power in case of local electricity outage or regional emergency. Typically the only service by which young children</p>

			<p>in home can report fire or threat, or medical emergency of their parent or caregiver. Also suited to send faxes from multifunction printer. These are our reasons for maintaining a land-line, By now we pay over \$50 per month.</p>
	Isaiah Bier	Web	<p>In the area of land lines the company is a monopoly. Furthermore, the company needs more oversight and not less due to the way it treats its customers. Case in point is my recent need for technical repair. Started dealing with them April 24, they scheduled appointment for 4/29, then for 4/30, 5/1, 5/2, 5/3 and 5/4. Even gave me 4 hour windows and for 5/4 notified me that tech will come in about 30 minutes. Nobody showed up. Now they rescheduled for Monday 5/6. Each time I had to wait at home for their arrival. No consideration for customers - THEY NEED MORE CONTROL NOT LESS.</p>
	Carol Boudreau	Web	<p>I would not classify CenturyLink as competitive as they have a significantly captive customer base in my area with no reasonably available alternatives. They offer just the minimum internet speed (Mps) and charge a maximum premium for land-line telephone service which is required to bundle with internet if you want it. While phone service has been more consistent lately there still seem to be more outages than one would expect for our climate.</p>
	Susan Piper	Web	<p>Docket#UT-240029 I am firmly against CenturyLink's petition to re-classify themselves as a Competitive Telecommunication Company! I think they need more oversight since they are not response to their customer.</p>
	JMC	Web	<p>Reference Docket UT-240029</p> <p>I am writing to express opposition to the proposed reclassification of CenturyLink to a Competitive Telecommunications Company.</p> <p>Many geographic areas served by CenturyLink Residential Landline Telephone service have few, if any, other telecommunication alternatives and rely on the traditional copper telephone line service provided by CenturyLink.</p> <p>Removing oversight and regulation provided by the Washington State Utilities and Transportation Commission (WA UTC) would leave many telecommunication customers with little recourse in instances of service failure or utility pricing concerns.</p> <p>A prime example of this involves my CenturyLink residential telephone service; it was taken off-line on February 10, 2024 due to overhead copper telephone cable theft and has yet to be returned to service as of this consumer comment submittal on April 4, 2024.</p> <p>I have submitted multiple service repair requests with Lumen / CenturyLink over the past 2 months and have not received a credible response for a repair timeline or when my</p>

			<p>residential telephone service will be reactivated.</p> <p>Thank you for the consideration in denying the CenturyLink request for reclassification to a Competitive Telecommunications Company, this telecommunications utility clearly demonstrates a need for continued (WA UTC) oversight.</p>
	Penny Ruby	Web	<p>Removing requirement for Century Link to obtain WUTC approval to discontinue or sell service in and area in the city of Sequim and surrounding Clallam County will put the many land line users service at risk. Sequim is an established retirement community and many retirement age persons do not have the background and/or resources to develop alternatives to their existing equipment and current levels of service through this company.</p> <p>I personally have maintained a landline on the Olympic Peninsula, in the Sequim area for more than 40 years and do not have an IT Department in my home to keep track of the "free market" pace of developments in telecommunications, nor the resources to purchase new equipment and pay for the attendant services, updates, downloads, etc. that further deregulation will bring. I know there are many others in this community similarly situated.</p> <p>The systems for delivery of land services have developed over many years, and once allowed to erode, will be near, if not impossible to replace. This infrastructure can be considered to be essential as a public utility that delivers electricity, water, or waste management services.</p> <p>Please do not grant this request for further deregulation.</p>
	Craig Ackley	Web	<p>I oppose it because it would take the lid off of rates and there would not be any regulation on it and would seriously affect all customers.</p>
	Penny Ruby	Web	<p>Removing requirement for Century Link to obtain WUTC approval to discontinue or sell service in and area in the city of Sequim and surrounding Clallam County will put the many land line users service at risk. Sequim is an established retirement community and many retirement age persons do not have the background and/or resources to develop alternatives to their existing equipment and current levels of service through this company.</p> <p>I personally have maintained a landline on the Olympic Peninsula, in the Sequim area for more than 40 years and do not have an IT Department in my home to keep track of the "free market" pace of developments in telecommunications, nor the resources to purchase new equipment and pay for the attendant services, updates, downloads, etc. that further deregulation will bring. I know there are many others in this community similarly situated.</p>

			<p>The systems for delivery of land services have developed over many years, and once allowed to erode, will be near, if not impossible to replace. This infrastructure can be considered to be essential as a public utility that delivers electricity, water, or waste management services.</p> <p>Please do not grant this request for further deregulation.</p>
	Lottie Voller	Web	I want to keep the land line, I don't want them to do away with it. They should provide service providers in their place.
	Melissa Flores	Web	<p>comments typed by Sam Cooper per request of customer to CP hotline: The customer receives CenturyLink landline service at their business in Kent. CenturyLink is the only available service at that address (that side of the street). We have tried numerous times to be able to change it. Comcast will say they're available, but if you call Comcast they aren't. There is no competition. Essentially the bill I get for CenturyLink is the same amount I pay for other businesses I have other competition. This says they would be able to raise the rates on customers. CenturyLink puts in lots of fees. So If you enter a contract with them it could be \$50 more than what you agree to due to the fees and other charges. At the end it's never the same. All the businesses in this shopping center (where Ikea is) can only get CenturyLink. Nobody else wants to provide service because it would be too expensive to put in facilities. If there was no regulation the customer believes bill will go up. There is no reasonably available alternative and CenturyLink does have a captive base in this area. I have no other choice. If I could choose another service I would.</p>
	Milton Horst	Web	<p>Re: Docket UT-240029</p> <p>I oppose the change to classify CenturyLink as a Competitive Telecommunications Company. There is no reasonably available alternative available to me that will function during a power outage. You should not assume that everyone has access to a cellular phone. Also, please remember that a cellular phone can only operate so long as its battery is charged. Continued regulation of CenturyLink would help ensure that reliable communications service continues to be available during emergencies at an affordable cost.</p>
	Grady Thompson	Web	<p>I am a resident inside the incumbent territory of Qwest Corporation dba CenturyLink QC commenting on the petition by Lumen Technologies, Inc. for its ILECs operating in Washington to be reclassified as competitive.</p> <p>A glance of the UTC's news releases shows that the Companies have been frequently investigated and recommended to be fined for outages, poor customer service, and disconnections. https://www.utc.wa.gov/regulated-industries/utilities/telecommunications/telecommunication-news</p>

			<p>Recently, the Companies have been featured in Ars Technica for not fixing customer's telecommunications service and billing issues until the media contacted the Company. This is not acceptable especially for a company that seeks to be "competitive". https://arstechnica.com/tech-policy/2024/05/centurylink-left-users-with-no-service-for-two-months-then-billed-them-239/ https://arstechnica.com/tech-policy/2024/02/centurylink-left-customers-without-internet-for-39-days-until-ars-stepped-in/ https://arstechnica.com/tech-policy/2023/08/centurylink-left-86-year-old-woman-with-no-internet-service-for-a-month/</p> <p>Therefore, I do not believe the Lumen ILECs should be reclassified as competitive. In addition, I believe the UTC should do anything it can in its regulatory oversight to encourage the Companies to expedite the rollout of their "Quantum Fiber" fiber-to-the-premise (FTTP) services as an effort to modernize and increase service quality, availability, and reliability. Thank you.</p>
	JURIS SARINS	Web	<p>Century Link has filed a petition for competitive classification of landline telephone service in the area where we reside, which would allow them to discontinue landline telephone service here. We have a residential elevator, which requires reliable communication to be able to summon help in case of a mechanical failure. Currently there is no alternative, communication available. Cell phone signal at our address is nonexistent. Wi-Fi as option is provided by the same Copper circuit as the voice, so even this option is non-viable. Without the landline, a person(s) trapped in the elevator would have no way of summoning help, which under some instance could become fatal, thus I very strongly oppose this petition.</p>
	Nancy Lynn Whitney	Web	<p>Lumen is proposing to be reclassified and 'de-regulated' to be able compete on the free market. In their proposal are 2 things that I specifically object to. First, they want to eliminate all but 800 landlines and they apparently get to decide who keeps it, based on the 'availability' of only satellite or landlines. They want everyone to switch to VOI. They should not get to decide that and take away that service. Landlines do not require power to work. For those of us who live in areas where there are outages and sometimes long ones, this is cutting off communication to those individuals. People like me have phone jacks in various locations. VOI doesn't recognize use those jacks, making them useless. So, if you want an extension in your bedroom, you will have to use a cordless phone, which can fail in a power outage. VOI requires internet service, which some people, especially older adults DON'T NEED. I am guardian to a 93 yo and moved her to a facility 2 blocks from my home. Others in the building have CenturyLink landlines but I was told it was no longer available at that address. There are jacks in the apartment which are useless. She doesn't need internet. VOI was required at her last address and we were paying over \$100 a month, just for the phone because it has to have internet. Also, because of her age and disabilities, cordless phones are useless to her. Needless to say, I didn't opt for VOI with CenturyLink or anyone else. Getting rid of landlines at the company's discretion will cause</p>

			<p>major headaches, in time and money, for people, especially older adults and disabled individuals.</p> <p>The second part of the proposal would take away the UTC's ability to regulate and advocate for consumers when things go wrong. I have had my current landline since 1979. I have moved it to 3 addresses. During that time, I have not had any issues, until last August when my phone would no longer receive calls. It took about 3 weeks and a couple of tries to get it fixed and the tech said it would happen again and if so, cable would need to be replaced. Well, it happened again. This past February, the same problem occurred. It took 3 weeks to get the first tech out. It's the cable, he said, but he wasn't sure where. (apparently, they are not required to keep records of past issues and repairs, so he had no idea what the guy did last year.) I have not had any service for nearly 4 months. I have had a half dozen appointments scheduled where no one showed up and in half of those a 'tech is on their way." They have known since March what needs to be done. They assigned me case manager from their Consumer Advocate department. They didn't help at all and finally I received an email that that email address I was writing was discontinued. And the whole time I have been without service, they continued to bill me. When I called, I was told, "it's our policy to give credit after the service is restored. " I insisted that I should not be billed for services not provided and got credit. I had to call three times.</p> <p>I will say that all the people on the phone from CenturyLink have been nice, polite and wanted to be helpful. But the company is too big for them to make any impact on behalf of customers. I have made scores of calls and spent hours on the phone trying to get it fixed. In the meantime, the main number for friends and family is dead, for almost 4 months.</p> <p>It is my belief that if they are granted this de-regulation' they will get so much worse than they already are. I pay over \$60 per month for a basic landline and a non-published number. I don't even have long distance. If they de-regulate they will eliminate our landlines and make us pay more for services we don't need.</p> <p>I worked for Pacific Northwest Bell in 1981 and was there during the big "split," moving to AT&T because I worked in the Phone Center Store. I remember the logic was to make sure there wasn't a monopoly on services and phones. Now Lumen is asking to undo that. Maybe we should be going the other direction. If they want to sell phones and internet, it should be a separate business and keep phone services as a utility that is regulated.</p> <p>Please do not allow CenturyLink to be classified per their request. And I would like to see increased regulation power for when their service fails.</p>
	Hugh Jones	Web	<p>We are on a fixed income, wife dealing with cancer, I with heart problems, we rely on our land line phone provided by CenturyLink for both emergency & medical provider needs, as well as personal business & contacts.</p> <p>This CenturyLink service is the only provider for this and for internet access available to us. Unless we have the continued protection of the W.U.T.C. to monitor and regulate</p>

			<p>CenturyLink there is a grave risk the rates will skyrocket, end the service will suffer, leaving us suffering financially and leaving us vulnerable to both safety and medical needs. Please reject their Docket UT-24009 petition and continue to protect the citizens of Washington State.</p>
	MARY	Web	<p>Comments in regards to CenturyLink Classification Petition</p> <p>Docket Number: UT-240029</p> <p>CenturyLink has filed a petition with the Washington Utilities and Transportation Commission (UTC) seeking competitive classification pursuant to RCW 80.36.320 and WAC 480-121-061.</p> <p>I would encourage the UTC to deny their petition. CenturyLink is the largest telephone company in Washington, many citizens rely on their services, land lines as well as internet access.</p> <p>I received their NOTICE OF VIRTUAL PUBLIC COMMENT HEARINGS – Published March 22, 2024 in the April Billing. In this notice CenturyLink explains the reclassification can take place when customers have reasonable available alternatives and the company does not have a significant captive customer base.</p> <p>In light of the many, multiple day outages since February 2024 I don't believe CenturyLink has its customer's best interest in mind. I believe the outages are done deliberately to encouraged customers to find alternatives.</p> <p>I realize the UTC only oversee TELEPHONE land line and not internet but they provide both so when one is down they are both down.</p> <p>IF and when CenturyLink is allowed to quit serving the rural areas of Washington for land lines there needs to be more cell towers with back-up power to serve those areas. If the power goes out so does the local cell tower you are putting thousands of lives at risk in the event of an emergency.</p> <p>The only alternative to land lines provided by CenturyLink is Cell Phones, I realize most people now have cell phones but service amongst the various providers varies from area to area.</p> <p>For those who do not have cell phones, there can be an upfront expense to purchase a cell phone and a more expensive plan may be needed to get cell coverage where they live. There</p>

			<p>are still areas where there is NO cell coverage. So is that really a reasonable available alternative?</p> <p>I interpret their petition to be a plan to quit serving rural areas so they don't have to upgrade their equipment and service lines. And the real bonus for CenturyLink would be their rates would then be governed by the free market.</p> <p>Please consider the impact your approval of this petition would have on so many residents of out lying areas.</p> <p>Thank you.</p>
	Peggy Oberst	Web	The customer is opposed to CenturyLink's proposal in docket UT-240029
	Wendy Condiotty	Web	opposed to the proposal of competitive classification because there are very few service provider options in NE Seattle
	John Bridenbaugh	Web	I think the operative word is Competitive. CenturyLink has not been competitive for years. We now pay more then cellphones for less service. No spam protection. No calling number ID system that works, even though you pay extra for it. No long distance – cell phones go to Canada and Mexico, our landline will call only locally without lots of additional expense. No Text or Internet. CenturyLink charges additionally for relocation services, but there are lots of telephones that PSE had put in as new to replace old ones and the old one is still there years later because CenturyLink has not moved it's line to the new pole. Lastly CenturyLink is the only system that can likely stay up in a disaster or major outage of cellphones (See ATT last Week). CenturyLink is not Competitive because they have not forced to be, which is the job of the UTC so please do your job.
	Joan Riggin	Web	UT-240029, This year since May I have had a hum on my phone to scratching to no dial tone and the technician comes out the dial-tone comes back on three occasions they say they are not coming. My neighbor has not had a dial tone they have not had this bad of service. They were told the cable was old and needs to be replaced. I think CenturyLink is not fixing their potholes then to be free of the UTC regulations. I think they need the oversight of the UTC instead of telling us to take it to court.
	Jetta Hurst	Web	Comments typed by Sam C. after the customer called the Consumer Protection hotline: I am against declassifying CenturyLink. I am against ceasing to regulate rates, contracts and services of CenturyLink. I am against docket UT-240029 going into effect. It will hurt low-income people that have landlines and people with no alternatives.

	Robert Hasstedt	Web	<p>Docket#UT-240029</p> <p>I am opposed to CenturyLink changing their status to a competitive classification. I use a land line only, so my choices are limited. I am in favor of more regulations from telecommunications companies, not less.</p> <p>Respectfully,</p> <p>Robert Hasstedt</p>
	C B Rakoski	Web	
	Joan Chantler	Web	<p>CenturyLink, currently the sole landline and internet provider for many residents in the Snowden area, myself included. They are currently seeking to get approval to become the more relaxed status of "market provider". This status would enable CenturyLink to drop customers, and/or raise their rates at will. This is a very serious threat to all their rural customers. In a market situation, competition helps keep prices down. Century Link is the only game in town. Please continue the current policy.</p>
	Jacqueline	Web	<p>They are the only provider, they are a monopoly, and they raise my rates every 2 month. I have to call and struggle with them all the time. I am a senior on a fixed income and have a disability. This is my only phone line and its vital to me. I feel this is an outrageous charge for such a basic important service I need. Their business practices and pricing are deceiving and bad. I am against CenturyLink, a monopoly, should not be de-regulated.</p>
	Ivan Hurst	Web	<p>This proposal will affect the vulnerable population. I don't believe the FCC or UTC would approve of this proposal. Please contact me by phone with more information as available.</p>
	Amy Elliott, Trustee for Lex Terra Trust	Web	<p>Docket UT-240029</p> <p>We, and everybody on our road, DO NOT have cell service or fiber optic service, and will have NO PHONE and NO 911 if century link terminates landline service to us. There are WAY more than "800" customers in Stevens County who do not receive cell signals at home and have "only satellite and landline options for voice service," and we are one of those accounts.</p>
	Joseph Medeiros	Web	<p>CenturyLink needs more regulation not less. I live in an unincorporated community in East Pierce County located between South Prairie and Orting. We are an underserved area. To remedy the situation, in 2021 our community applied for and received a grant to upgrade the service to fiber optic cable and get rid of the old copper wiring. At the last-minute CenturyLink backed out. The reason given is that we a low revenue area that does not warrant the upgraded service. When I questioned a CenturyLink employee I was told, not</p>

			<p>once but twice, that if I wanted better service I should move. Why is CenturyLink allowed to discriminate against those in low revenue areas. We cannot switch to another carrier because as I was told "we belong to CenturyLink". So, we are stuck with their poor uncaring service. Why is CenturyLink allowed to discriminate against us. We use Puget Sound Energy (PSE) for electricity. I get the same electrical service as those living in Bonney Lake, Kent, Auburn, and Enumclaw. Many are remote areas but everyone gets the same service. There is no discrimination for being a low revenue area.</p> <p>As recently as February 2024 we have experienced two service outages that lasted longer than a week some went two weeks. I did file a complaint with the Utilities Commission. Again, CenturyLink is slow to respond as we are a low revenue area. With the outage there was NO phone service. Our security and emergency response system did not work. Unlike a power outage where we can go to battery backup to keep the systems active CenturyLink has no way to for us to use a battery backup.</p> <p>Recently a neighbor requested an additional phone line for their home. The neighbor was told that there were no hook ups available. This does make sense if you want an area to stay a low revenue area then do not expand your service in the area as you might start to earn more revenue.</p> <p>CenturyLink lies and cannot be trusted. Please they need more regulation not less.</p>
	Candace Mattson	Web	<p>We live in an area with poor cell service and continue to need our landline service. This service is critical as we are older, have some health issues and don't drive at night. Also we have been without Centurylink service for extended periods in the last 6 months with the longest being a month late last fall. When we tried to call on someone else's phone we could not get past a robot. A service tech working several miles away said we were on the "out" list but had not been put on his job list. There is no physical site to visit. Maybe they should invest some of their massive earnings in repairs and maintenance. They did not adjust our bill for even the long outage.</p>
	Beverley Brown Losey	Web	<p>Status needed to complete assessment of who uses land lines would probably come initially from DSHS. Agency head may know # of low income families who have elected to have one landline due to economic limitations so that at least parents and children can have one phone to call from for safety purposes and to contact necessary service providers such as clinic and hospitals etc. Also, programs for seniors on low income and for the deaf (land line phones provided to those with severe hearing loss with captions available to persons with severe hearing loss from federal program.</p> <p>Attorney General office and/or consumer protection may also have data as to problems if</p>

			<p>only cell phones are provided to homeless and may know what, if any, criminal activities might benefit from taking homeless peoples phones, using and disposing fo phones. Example: dealing in black market or what is coming called "drugs".....etc.</p> <p>Also, don't know what information is available about just plain no land lines and more cell phones and interference with taxi cabs, buses etc that report certain information sometimes on radio frequence and also with "cell phones".</p> <p>Also, some companies may be able to provide what is a "low private rate" or the lowest rate for one form and Century Link ought be able to provide information as to how much "fees or tax" or other money or funds (not paid for by qualified low income program participations) but availabe to Century Link as a gov't recognized public utility.</p> <p>Thank you for your allowing me to comment. Beverley - Kitsap Co.</p>
	Robert Connor	Web	<p>We have no cell phone up here, we live up in the woods, and that's ok but we need our landline to contact Fire or Law enforcement. We need have to have our computer for work, among many other aspects of daily life. We have fears that we could be dropped, and our services being discontinued. I certainly do not want to pay more, and we don't want to drive to town to contact emergency services in an emergency.</p>
	Lorne Burley	Web	<p>We rely heavily on our landline, our cell phones are unreliable. We both have had health concerns, and we need reliable service. It looks like CenturyLink is trying to get rid of landline and our phones are tied into our alarm system and it won't work if we don't have the landline. So, it is a matter of health and safety for us.</p>
	Isaiah Bier	Web	<p>The company is applying for a "Competitive Classification" which is totally absurd. It has no competiion whatsoever for land lines, Even lines like those offered by Comcast through their cables is no competition because they do not work in case of a power outage. We maintain their service due to the frequent power outages happening since PSE took over power service. Please reject CenturyLink"s application. Thank you.</p>
	Jeff Churchill	Web	<p>About the reclassification hearing, they are the only available line that I have, there is no competition in my area. I have a cell phone but that is not reliable.</p>
	Joel Moser	Web	<p>Comments typed per customer request by Sam Cooper. The customer has open complaint CAS-45332. They previously recorded comments but wanted me to record new comments express their opposition to CenturyLink's request. They wanted me to note they have had no service for 70-some days and are still being billed \$90 a month. They're paying at this point to keep the phone number.</p>

	Joy Markgraf	Web	<p>UT - 240029</p> <p>If proposal is to discontinue landline service, the customer is very much against it. "I'm a citizen or rural Klickitat County. I've paid my phone service for 30 years. I do not have cell service. What would I do in an emergency? How would I contact family and friends? Life would be very lonely. Please don't take my landline away."</p>
	Richard Johnson	Web	<p>We live in a rural area with no cell phone. The landline is everything to us. Please do not take it away from us. We are not in favor of this. We would like Public Involvement to call us to discuss. Thank you.</p>
	Katherine White	Web	<p>I believe CenturyLink needs to be regulated and they not only need to preserve land lines, but they need to invest in them and do better maintenance. These land lines are very important to me and to others and we do not want to be forced into moving to their VOP services which do not work when the power is out.</p>
	Nancy G Anderson	Web	<p>#240029 on the docket now.</p> <p>Please do not allow the removal of landlines from Stevens Co. or in other rural areas that cell services are either not available or unreliable.</p> <p>This is going to cut off large numbers of people from being able to access emergency service or even report a fire. It is not a good plan.</p>
	Ellen Stone/account under Don Palmer	Web	<p>Cellphone service in this area is unreliable. The landlines are the only reliable way to communicate. Taking them out would cut out emergency services. Any questions I can be contacted by phone. This is concerning docket number UT-240029.</p>
	Fred Greef	Web	<p>We live at 249 Bates Road in the rural Snowden Community, North of White Salmon, WA. Our two biggest concerns here are fire protection and internet service. We are retired and the availability of CenturyLink internet service was an important consideration prior to building our retirement home here.</p> <p>There are very few internet options here other than installing some kind of satellite dish. If CenturyLink is no longer required to get WUTC approval to raise rates or to discontinue service we will be at a severe disadvantage to other US citizens. We also depend on CenturyLink for phone service (landline), as there is no cell phone coverage here. Our neighbors with children in school also must have internet for their children to keep up with their school work. It is bad enough not to have cell phone use here, and not fair at all for rural communities to not have equal access to basic and essential services provided to all urban residents.</p> <p>If there was any competition for CenturyLink here for phone or internet, then free market options could help determine competitive rates charged. In fact there is no competition here.</p>

			It is also known that CenturyLink took public funding to help install these services to our rural community because we were underserved and deserved this support. Why would you then decide that this company no longer needs to serve this rural community after they were given this money, since they have no competition here?
	Susan Colton	Web	I think this is a really terrible idea. I don't want CenturyLink to be allowed do this! I have been a very loyal customer for decades. My landline is my lifeline. I am a senior, with a disability. Due to my disability I a requires a landline. The landline is an essential service for me. Over the years I have watched them provide less and less service and charge more money. I use my landline for everything. I have no idea what I could possibly do if they took away this landline. They really should be maintaining their line's better. They need to do what they agreed to do. CenturyLink's phone system doesn't work well, and you can spend hours and hours just trying to reach a human representative to speak to about your phone service. CenturyLink's chat feature uses automated responses that is useless when you have a problem with your phone line.
	Jerry Offerdahl	Web	Nobody in this immediate area has cell service, it would be detrimental to our area.
	kelly hogan	Web	they do have a captive customer base-POOR PEOPLE- one of the alternatives is another package deal which guarantees better service - of which i doubt- and cable tv internet hot spots all of which double the price. i have been with centurylink for almost 30 years, at the same address and until a month and a half ago i had no real problems but i have had my service cut off, even though i thought my bill was paid, but no i had updated my info online but they pulled a bank account number i used over 5 years ago they claim i entered it that way but they do not keep records of of bank info unless you use auto pay another lie there are so many more they would not help me get my service connected until i paid my past due amount they told me the amount i paid still could not access my account and was told i needed to pay my past due account and was told no i did not have a past due amount they did not include the late charge because it was added to my current bill that is not due until july 17 i was told if i did not pay i would not be reconnected and i paid then still could not access my account to get my modem staightened out i was told so many lies i needed a new modem but no i did not i had my tech guy come over and go to the gui which was done on a wireless /wifi desktop that later i was told i could not do that my modem would not work right after i told her i was using it then i could go on and on long and short of it in that time span i have had over 167 interactions with them my account is still not totally accessable to me i was also told i could not verify my contact information except thru them even though i had up dated my info over 63 times that they made me reset my account thats ruse one the next log off relog in use a different browser reset account reset modem am i sure i am enterting my info right even though when they repeated it back to me they hade it wrong i sent on low of only 2 hours on line trying to get help up to 5 1/2 hours i have to enter do not

			do anything to my account no resets etc today on my 5th call of the day i did not and they sent me a reset text i am running out of passwpord ideas i cant hardly keep up with all i've been through and i foundfound out if you end the chat you do not get the option for getting a transcript that is another one of ther tricks on the last call i asked over 27 times to end the chat and they refused hoping i would hang up and not be able to have proof of what they put me thru they think of their numbers and bonuses if they can appear to have solved your problem i waited for 47 minutes before they finally end the chat which i was told they could not end the chat i would have to so i would be in limbo until they relized i would wait them out if i could internet any where else at the approx amount because i cant afford any more i would leave in a flinstant they even told me there were glitches after i told them that their system had been breched and hacked while i was one there site i offered to send them the screenshots and was told they could not receive them from me now i just keep hearing dont click on it ignore it so how do i know if a text is really from cl they said open it and ask for verification hell i cant get an employees last 4 numbers of their work id o get a chat to end they would probably not have access to it
	Joel Moser	Web	Comments typed by Sam C. during customer's call to discuss their open complaint CAS-45332. The phone number listed is out of service, but it's the only number the customer has). I am a CenturyLink customer for many years, had the same phone number and address for almost 50 years. Over the last 3 years multiple outages, some as long as 35 days or more, and probably at least 8 outages. I do not want them to be out of regulation. I want the commission to have authority. I have presently been out since Jan. 15, 2024 (CAS-45332). We are now at Feb. 22, 2024, and they're still billing me (the customer understands pro rata credits and stated they will wait until restoral for the credit). In all cases CL just seems to stall and provide assorted excuses. I am guessing I've been out probably approaching 90 plus days total (8 complaints in CRM). I strongly do not want the UTC to stop having regulatory authority. For safety reasons I need a landline. Please do not let them get out from your regulatory thumb. I live alone. This is my lifeline. I'm a senior citizen and having a landline allows me for emergency services, lifeline, ambulance, police dept. This needs to be a timely fix and not put off for various excuses over the years. I need this service to work.
	Tracy McCune	Web	UT240029 Strongly opposed to this. Wants a callback to ask questions about this docket. 541-806-2662
	A Smith	Web	I read on the CenturyLink website the company has applied for a Competitive Agreement with the state. I have been a customer of CenturyLink for over a decade. Recently, in January 2024 my internet service was interrupted. The company made seven(7) scheduled appointments with me in a three(3) week period to come to my home between 8:00am-5:00pm. Each day the technician no-showed and missed the appointment. Waiting around the house all day expecting my device to get fixed was extremely frustrating. They provided

			little to no explanation and I would have to call them to get another technician scheduled. I do not believe the company should reciprocate little to no over site as they are asking. I am a rural internet customer. Rural internet has been in the news a lot lately. But my internet service is still down and has slowed throughout the years. CenturyLink has no plans to improve the quality of the network in my area of the state.
	Frank Palmer	Web	UT-240029 : In regards to CenturyLink cutting out a bunch of customer that have landline services and cell services it would be a very tough blow for that to happen. My cell phone needs a battery pack and the only way my security system works is my landline. We have very poor service this area.
	Susan Eberhard	Web	I am not in favor of CenturyLink being classified as Competitive Telecommunications Companies. I live in an area where this company is my only choice for land line telephone service, so there is not competition here.
	Gerald Brown	Web	Docket No. UT-240029. There are no other ways to get phone service where I'm located. The rates will go up if the company is competitively classified.
	Brenna Hurst	Web	CenturyLink needs more regulation.
	Martha Dumham	Web	I am a captive customer I have been without service for six weeks. I have no alternatives. Clearly reducing regulations is a poor choice.
	Charlotte Jones	Web	Our opinion about the reclassification of the company, and when the power goes out, we lose the landline. We have cell phones that aren't reliable, it would all go away if they get classified differently and we would have to start all over again.
	Ivan Hurst	Web	I do not have alternative means of service if they are granted competitive status I will not have alternative means of service where I live.
	Vickie Wenger	Web	Dear Commissioners, I am against CenturyLink's proposal to eliminate land line service and I hope that the Commissioners vote against this proposal because this is the only telephone service available to use in our area. That is the only service we have. We have no cell reception service in our area as it is rural. We feel that CenturyLink was given a monopoly on land line services, and they should keep their promise to provide these services and maintain the lines.
	Patti Swingle	Web	The thought of CenturyLink skating away from its responsibilities of fulfilling its obligation to provide reliable telephone service to all of its customers INCLUDING THE "CLASS OF APPROXIMATELY 800 CUSTOMERS WHO HAVE ONLY SATELLITE AND LANDLINE OPTIONS FOR VOICE SERVICE" causes great distress to many. From a neighbor "landline died and the century link told us it would be \$3,000 to 5,000 to install a new one... about 70 people up and down LMR have lost service to landlines.

			I also represent my two neighbors Gene Winter's (360-681-3816- in a cellphone dead zone) and Gerda Tamura's (360-681-0755- blind, 88 yo, limited income) concerns with the CenturyLink debacle. During the previous single-digit winter, both of their phones were down for roughly 17 days in close succession with poor to no support services available. Sure - a well-run CenturyLink replacement company would be more than welcome but who's going to want to clean up CenturyLink's mess? Isn't it a government obligation to provide phone service to it's citizens?
	Carol Wilkerson	Web	This utility is necessary part of our lives and we hope they do the right thing and maintain our ability to function by providing and maintaining land lines as that is sometimes the only available service and is necessary for work, medical and family connections and basic communication. We use this as our primary communication service as we live in the mountains and cell phone service is spotty at best. Cell phones and satellites don't work often due to fog or winter condition's here. I am one of many people in our area that face these same issues due to living in the mountains.
	Jo Dean Eleanor Sarins	Web	CenturyLink Petition for Competitive Classification #Docket UT-240029 I strongly oppose this petition. I live in an area where cell phone coverage is spotty and inconsistent at best. If an emergency arose, there is no reliable way of communicating without a wired line. I also run a business out of my home, because of the inconsistency in the cell phones, I am forced to use a landline to communicate with clients. Please consider this information in your decision making. Jo Dean Sarins Array of Elegance 15 Osbourne Road White Salmon, Wa. 98672
Undecided			
	GEORGIANN BROWN	Web	CUSTOMER DOESNT HAVE ZOOM AND NEED MORE INFORMATION
	Jonathan H. Brock	Web	I am submitting comments on behalf of the Washington Military Department's Emergency Management Division 911 Coordination Office in this matter. RCW 38.52 confirms the importance of access to 911 and the State 911 Coordination Office is responsible for assuring that 911 dialing is operational statewide. Washington currently has geographic areas that rely on a single service provider to access 911 services. CenturyLink

			being reclassified from an incumbent carrier to a competitive carrier could potentially impact or eliminate access to 911 services where no other communication option exists. The State 911 Coordination Office is concerned that areas of the state could go unserved or lose access to 911 services and wants to ensure safeguards are in place if this reclassification is granted.
	Carol Cohoe	Web	I have not read the specific proposal for "competitive classification" but if it relates to the statement that "The commission does not regulate the rates of broadband, cellular, cable, or internet service" then my response is that we prefer MORE regulation to protect consumers, MORE oversight and prefer you add the above-mentioned rate categories to an oversight agency, perhaps one that acts like it has teeth and will actually say NO when utilities are getting greedy or trying to bypass environmental or consumer regulations.
	Thomas Zdrojkowski	Web	I have called Century link to find out if I am in a group of customers referred to as "Protected Customers". An employee, Ray, of Century Link called me on 5/12/24 shortly after 3 p.m. to let me know that he was not able to determine if I am a member of the Protected Customer group. I am hoping that someone in your office will be able to find out if I am a member of the aforementioned group. I have a land line, which is my primary phone number as listed above. I have had this phone line and number since about 1985. The payment for service also includes a DSL phone line which provides my WiFi service. Unfortunately,
	Carol Cohoe	Web	I have not read the specific proposal for "competitive classification" but if it relates to the statement that "The commission does not regulate the rates of broadband, cellular, cable, or internet service" then my response is that we prefer MORE regulation to protect consumers, MORE oversight and prefer you add the above-mentioned rate categories to an oversight agency, perhaps one that acts like it has teeth and will actually say NO when utilities are getting greedy or trying to bypass environmental or consumer regulations.

ATTACHMENT OF RUSSELL M. BLAU

Morgan Lewis

Russell M. Blau

Partner
+1.202.373.6035
russell.blau@morganlewis.com

February 23, 2024

VIA E-FILING

Amanda Maxwell, Executive Director and Secretary
Washington State Utilities and Transportation Commission
P.O. Box 47250
Olympia, WA 98504-7250
records@wutc.wa.gov

RE: Docket UT-240029

In the Matter of the Petition of the CenturyLink Companies – 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

INFORMAL COMMENTS

Dear Ms. Maxwell:

Pursuant to WAC 480-07-140(1)(a) and WAC 480-07-498, Onvoy, LLC (“Onvoy”) submits these informal comments in response to CenturyLink’s Petition for Competitive Classification (“Petition”).¹ Onvoy is authorized to provide telecommunications services in Washington under the registration granted in Docket UT-112010 and offers wholesale local exchange and long-distance services, tandem switched access, transit, and other access services to other carriers. In order to serve its own customers, Onvoy interconnects with and buys services from incumbent local exchange carriers (“ILECs”) like CenturyLink.

In its Petition, CenturyLink seeks competitive classification of all its Washington ILEC companies. However, CenturyLink’s Petition does not present a *prima facie* case that *all* the intrastate enterprise services those ILECs offer are subject to effective competition, failing to meet its burden under RCW 80.36.320. Indeed, many, if not all, of those services remain noncompetitive. Therefore, the Commission should dismiss the Petition and retain CenturyLink’s current alternative form of regulation. Alternatively, CenturyLink remains free to request competitive classification for particular retail services only, consistent with RCW 80.36.330.

¹ *In the Matter of the Petition of the CenturyLink Companies – 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*, Docket UT-240029, Redacted Competitive Classification Petition (Jan. 8, 2024) (“Petition”).

Morgan, Lewis & Bockius LLP

1111 Pennsylvania Avenue, NW
Washington, DC 20004
United States

T +1.202.739.3000
F +1.202.739.3001

I. Background

In Washington, CenturyLink is currently subject to an alternative form of regulation (“AFOR”) under a statute giving the Commission flexibility to “determine the manner and extent ... of regulation as may in the public interest be appropriate” by waiving certain rules applicable to telecommunications companies.² Adopted in 2014 for an initial term of seven years (and extended several times), CenturyLink’s AFOR Order provides that CenturyLink is regulated “as if it were classified as a competitive telecommunications company under RCW 80.36.330,” subject to exceptions.³ The parties to the AFOR proceeding and the Commission agreed that continuing regulation was necessary because certain CenturyLink services—including “WTAP, federal lifeline and link-up, 911/E911, and certain wholesale services”—were noncompetitive and “would preclude actually classifying the Company as competitive under RCW 80.36.320.”⁴ The AFOR does not affect the Commission’s authority to regulate CenturyLink’s wholesale obligations or carrier-to-carrier service quality requirements,⁵ and the following CenturyLink services remain tariffed:

- a) Exchange Areas, Local Calling Areas, and Maps
- b) Washington Telephone Assistance Program (WTAP)
- c) Lifeline and Link-up Programs
- d) Basic and Enhanced Universal Emergency Number Services — 911 & E-911
- e) Interconnection Services
- f) Resale Services
- g) Switched Access Services
- h) Wholesale Services.⁶

As alluded to in the AFOR Order, Washington statute provides separate mechanisms whereby a noncompetitive telecommunications company may petition the Commission for competitive classification of either the company itself or particular services it offers.⁷ In either case, the petitioning company must show that its business as a whole or particular services it offers are subject

² RCW 80.36.135. In general, the Commission may grant an AFOR if the company shows that a more flexible form of regulation would, among other factors, facilitate technological advancement and be pro-competitive. See RCW 80.36.135(b)(2).

³ See *In the Matter of the Petition of the CenturyLink Companies Companies–Qwest Corporation; CenturyTel of Washington; CenturyTel of Interisland; CenturyTel of Cowiche; and United Telephone Company of the Northwest, To be Regulated Under an Alternative Form of Regulation Pursuant to RCW 80.36.135*, Docket 130477, Order 04, Final Order ¶ 38 (Jan. 9, 2014) (“AFOR Order”). This AFOR replaced a pre-merger AFOR for Qwest.

⁴ *Id.* ¶ 44.

⁵ AFOR Order, Attachment A at 2 (“This AFOR does not affect the Commission’s authority to regulate CenturyLink’s wholesale obligations under the Telecommunications Act of 1996, nor does it affect existing carrier-to-carrier service quality requirements, including service quality standards or performance measures for interconnection and appropriate enforcement or remedial provisions in the event CenturyLink fails to meet service quality standards or performance measures contained in tariffs, ICAs, commercial agreements, or otherwise.”).

⁶ *Id.* Wholesale services were later removed from the tariff when CenturyLink showed that these services are largely obtained through interconnection agreements, obviating the need for a wholesale tariff. See Docket UT-130477, Order 06.

⁷ RCW 80.36.310.

to "effective competition."⁸ Under RCW 80.36.320, the petitioning company must show that all services it offers are subject to effective competition, whereas under RCW 80.36.330, the company must make the showing only as to a particular service or services.⁹

In its Petition, CenturyLink seeks competitive classification under RCW 80.36.320, insinuating that it seeks competitive classification of all its services.¹⁰ CenturyLink's analysis, however, focuses exclusively on the consumer voice and broadband markets. CenturyLink also clarifies that its "wholesale obligations will remain unaffected" and agrees to abide by AFOR Exception 1 as a condition of its competitive classification.¹¹

II. CenturyLink Does Not Make a Showing of Effective Competition as to All Services

CenturyLink has not met its burden under RCW 80.36.320 to show that *all* services it offers are subject to effective competition.¹² Rather, its Petition only discusses its consumer voice and broadband offerings and the competition it faces in those markets from cable, mobile, and other service providers. Absent from the Petition is any discussion of how the enterprise services that CenturyLink sells to CLECs like Onvoy are subject to meaningful competition. As a straightforward matter of statute, therefore, CenturyLink is not entitled to competitive classification under RCW 80.36.320.

Indeed, CenturyLink exercises significant power over the market for high-capacity dedicated services it offers to other telecommunications companies. As an ILEC, CenturyLink maintains a monopoly over the local exchange infrastructure to which CLECs like Onvoy require access in order to effectively compete. As such, Onvoy and other CLECs like it are captive customers for CenturyLink in the market for access services and lack reasonably available alternatives.

⁸ Under both provisions, "[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." The Commission considers factors including, but not limited to: "(a) The number and sizes of alternative providers of service; (b) The extent to which services are available from alternative providers in the relevant market; (c) The ability of alternative providers to make functionally equivalent or substitute services readily available at competitive rates, terms, and conditions; and (d) Other indicators of market power which may include market share, growth in market share, ease of entry, and the affiliation of providers of services." RCW 80.36.320.

⁹ See RCW 80.36.320; RCW 80.36.330. The Washington Legislature is currently considering a proposed amendment to RCW 80.36.320 that would enable incumbent local exchange carriers like CenturyLink to become competitive carriers upon notice to the Commission if they (1) are operating under an AFOR and (2) not receiving universal communications services program distributions under RCW 80.36.650. See <https://app.leg.wa.gov/billssummary?year=2023&billnumber=5455&initiative=false>.

¹⁰ Petition ¶ 42 ("As a matter of statute, CenturyLink is entitled to competitive classification, without further conditions, pursuant to RCW 80.36.320(1), as it is clear that the CenturyLink ILECs are subject to effective competition and lack a substantial (if any) captive customer base.").

¹¹ Petition ¶ 46.

¹² See WAC 480-121-061 ("In any competitive classification proceeding, the telecommunications company has the burden of demonstrating that the company or specific service(s) is subject to effective competition.").

CenturyLink's excessive price increases in markets for interstate special access services in the wake of federal deregulation are instructive. In Mesa County, Colorado, for instance, Onvoy has experienced price hikes for access to certain circuits in excess of eleven (11) times the previous rates. In other counties deemed competitive at the federal level, monthly recurring charges for items such as multiplexers have increased over 400% since deregulation. At the interstate level, then, competition in the market for special access services has not proven "effective" since deregulation. And if the Commission classified CenturyLink's intrastate special access and other enterprise services as competitive, CenturyLink would face no obstacle to driving up prices in the same fashion.

III. The Commission Should Dismiss the Petition and Retain the Current AFOR, or in the Alternative, Allow CenturyLink to Proceed Under RCW 80.36.330

Because CenturyLink's services are not subject to effective competition in markets for intra-state, enterprise-related services, and because CenturyLink does not attempt to show that they are, the Commission should deny the Petition and retain CenturyLink's AFOR status. Under the AFOR Order, CenturyLink is treated as though it were regulated pursuant to RCW 80.36.330 (with WTAP, federal lifeline and link-up, 911/E911, and certain wholesale services remaining classified as non-competitive); its interconnection obligations remain untouched; and enterprise and emergency-related services remain tariffed.¹³ In the Petition, CenturyLink appears to concede that these services are noncompetitive by declining to address them. Therefore, the most procedurally efficient resolution here is for the Commission to deny the Petition and continue the current AFOR.¹⁴

In the alternative, the Commission should construe the Petition as a request for competitive classification as to its retail services only under RCW 80.36.330 and clarify that the Exceptions set forth in the AFOR Order still apply.¹⁵ In its Petition, CenturyLink cites extensively the proceeding in Docket UT-121994 in which Frontier sought competitive classification.¹⁶ There, the Commission considered Frontier's requests under RCW 80.36.330 instead of RCW 80.36.320.¹⁷ Given that

¹³ AFOR Order ¶ 38.

¹⁴ In the Petition, CenturyLink cites a passage of the Order granting a fourth extension of the AFOR where the Commission notes that it will not grant another one-year extension absent extraordinary circumstances. Docket UT-130477, Order 10 ¶ 14; Petition ¶ 47. CenturyLink states that, as a result, it will return to rate of return regulation if the Commission does not order a new regulatory status in the interim. Petition ¶ 47. This is incorrect—the existing AFOR would instead remain in effect pending any modifications. The AFOR stipulates that six months prior to the end of the AFOR term, the AFOR parties and Commission Staff will conduct a review to see whether modifications to the AFOR are necessary. AFOR Order, Attachment A ¶ 2. All parties to the AFOR are entitled to participate and the Commission may hold a hearing if necessary. *Id.* While Commission deliberates the AFOR remains in effect. *Id.*

¹⁵ See AFOR Order, Attachment A at 2.

¹⁶ *In the Matter of the Petition of Frontier Communications Northwest, Inc., To be Regulated as a Competitive Telecommunications Company Pursuant to RCW 80.36.320*, Docket UT-121994, Order 06, Final Order (July 22, 2013).

¹⁷ *Id.* ¶ 52 ("As an initial matter, we construe Frontier's agreement with Staff and Public Counsel effectively to amend the Company's Petition to seek competitive classification of specified Frontier services under RCW 80.36.330, rather than of the Company as a whole pursuant to RCW 80.36.320.").

Ms. Amanda Maxwell, Executive Director and Secretary
February 23, 2024
Page 5

CenturyLink does not make a showing of effective competition as to its wholesale enterprise services, the same approach would be appropriate here.

Sincerely,

A handwritten signature in black ink, appearing to read "Russell M. Blau". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Russell M. Blau

Counsel to Onvoy, LLC

ATTACHMENT OF JUDY CHRISMAN



Judy Chrisman
PO Box 12
Galvin, WA 98544-0012



TACOMA WA 983
OLYMPIA WA
24 APR 2024 PM 3 L

W a t c

P.O. Box 47250

Olympia, WA. 98504-7250

98504-7250



RECEIVED

APR 26 2024

WASH. UT. & TR. COMM

Public Inv.

RECEIVED

APR 26 2024

WASH. UT. & TP. COMM

Judy Chrisman
P.O. Box 12
Galvin, WA.
98544

April 24, 2024

Century Link

Competitive Classification

Docket UT - 240029

To whom it may concern:

I am against the approval of this Century Link petition.

I believe this will increase my monthly bill. I do not believe we have many other options. I've had large companies buy out small companies & discontinue service in my area.

Please keep Alternative Form of Regulation - I believe there is more control over companies. Local knows better.

Sincerely

Judy Chrisman
Keep protecting me!

ATTACHMENT OF J. OTT

CERTIFIED MAIL®



SEATTLE, WA 98104 980
13 MAY 2024 PM 3 L

9589 0710 5270 0332 0926 57

RECEIVED
MAY 16 2024
WASH.UT. & TP. COMM

WUTC
PO Box 47250
Olympia WA
98504-7250

98504-7250



U.S. POSTAGE PAID
FCM LETTER
SEATTLE, WA 98126
MAY 13, 2024

\$5.08

S2324D503125-06



98504

Retail



RDC 99

PO Box 47383
Seattle, WA 98146

PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT
OF THE RETURN ADDRESS, FOLD AT DOTTED LINE

CERTIFIED MAIL®



SEATTLE, WA 98104 980
13 MAY 2024 PM 3 L

9589 0710 5270 0332 0926 57

RECEIVED
MAY 16 2024
WASH.UT. & TP. COMM

WUTC
PO Box 47250
Olympia WA
98504-7250

98504-7250



U.S. POSTAGE PAID
FCM LETTER
SEATTLE, WA 98126
MAY 13, 2024
\$5.08
S2324D503125-06



98504

Retail



RDC 99

PO Box 47383
Seattle, WA 98146

PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT
OF THE RETURN ADDRESS, FOLD AT DOTTED LINE

To: WUTC

5-10-24

POBx 47250

Olympia WA 98504-7250

Ref: Docket # UT 240029
"Competitive Classification"
Century Link

RECEIVED

MAY 16 2024

WASH.UT. & TP. COMM

I have a landline phone and depend on it as I cannot use wireless that causes headache heart problems insomnia anxiety and more. There is no wireless here and I need to keep it that way. No one brings any wireless phone or other wireless device into home.

The power goes out here from time to time, recently 3 times. Having a phone that works when this happens is essential for me. This is so very important for me. I am 1/4 mile from a bus stop and need to be able to call for a ride to go anywhere especially if there is an emergency and other help is needed. The phone (landline) allows operator calls etc works with 911 system & the calls are secure and not hackable. It is the superior system.

Also, by including notice of this and information on it in the back pages of a bill without any indication of meetings etc. on the front page, very few people will even see it or become aware of the issue. Is this by design?

p1

Please save our landlins. They are essential!

Thank you for your attention.

J. OTT
PO Box 47383
Seattle WA 98146

West Seattle
206-932-3234

ATTACHMENT OF FRANK J. PALMER



Frank J. Palmer
3415 Mountainview Rd.
Chewelah, WA 99109

SPOKANE WA 990

15 MAY 2024 PM 4 L



RECEIVED

MAY 21 2024

WASH. UT. & TP. COMM

Utilities and Transportation Commission
P.O. Box 47250

Olympia, WA 98504-7250

98504-7250



5-14-24

UTILITIES AND TRANSPORTATION COMMISSION

IN REGARDS TO CENTURY LINK'S PLAN TO DISCONNECT POSSIBLY 800 LAND LINES IN OUR REMOTE AREAS. OUR CELL SERVICE IS NOT RELIABLE

IN MY AREA VERIZON IS THE MOST RELIABLE.

I HAVE A HOME SECURITY SYSTEM WHICH VERIZON TRIED TO SET ME UP WITH THEIR SERVICE, WAS TOO POOR OF A SIGNAL TO WORK SO I NEED THE LAND LINE TO KEEP IT WORKING.

ALMOST ALL MY NEIGHBORES ARE FACED WITH THE POOR CELL SERVICE IN THIS AREA.

VERY MUCH HOPE THEY WILL RECONSIDER.

Thank you

Frank J. Palmer

3415 MOUNTAIN VIEW RD.

CHEWELAH, WA,
99109

309-935-6439

RECEIVED

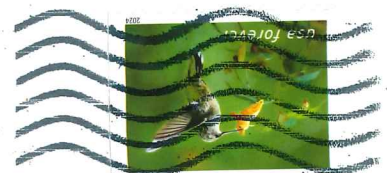
MAY 21 2024

WASH. UT. & TP. COMM

ATTACHMENT OF ELLEN STONE

Stora
P.O. Box 1102
Chewelah, WA
99109

SPOKANE WA 990
15 MAY 2024 PM 4 L



RECEIVED
MAY 21 2024
WASH. UT. & TP. COMM

Utilities & Transportation Commission
P.O. Box 47250
Olympia, WA 98504-7250

98504-7250



Utilities and Transportation Commission

Use reference to Century Link
discouraging our land lines: This
would end any reliable communication
in this area. I hope this action
will be reconsidered. Thank you
for listening.

Ellen Stone

5-14-24

Telephone # (509) 935-6464

Howe Colman
P.O. Box 1102
Chewelah, WA
99109

RECEIVED

MAY 21 2024

WASH. UT. & TP. COMM

ATTACHMENT OF MELINDA WALKER

June 10, 2024

Washington Utilities & Transportation Commission
P.O. Box 47250
Olympia, WA. 98504-7250

RECEIVED

JUN 14 2024

WASH.UT. & TP. COMM

Re: **Docket UT-240029**

Commissioners:

I am a CenturyLink customer, and I have been informed that CenturyLink has submitted a petition to the Washington Utilities & Transportation Commission (WUTC) requesting to be classified as a competitive telecommunications company. My understanding is that if this classification is approved, CenturyLink would cease to be regulated regarding rates, contracts or services, and that the company's rates would be determined by the free market.

I am writing to ask the commission to NOT approve the requested classification because of two major concerns:

1. CenturyLink has been losing customers and thus money, so if CenturyLink is reclassified and becomes unregulated, its customers can expect an increase in rates. CenturyLink has let it be known that its focus is on value maximization for shareholders. The approval would be a green light for CenturyLink to raise rates, unfettered by regulatory oversight.
2. CenturyLink has a notoriously poor customer service reputation. Many customers, including myself, have had frustrating experiences when trying to contact CenturyLink's customer service department because they operate primarily as a business with a casual, almost indifferent, attitude toward customer service. Though the WUTC has an informal complaint process, if CenturyLink becomes deregulated and the WUTC complaint process fails, per CenturyLink, a customer would have to use "market-based mechanisms, such as a lawsuit" to resolve a dispute, leaving the average customer without reasonable options for dispute resolutions.

In essence, CenturyLink does not respect its customer base, lacks integrity as a service business and is not trustworthy to regulate itself in an honorable manner in a free market environment. Please do NOT approve CenturyLink's request for classification as a competitive telecommunications Company. It needs regulatory oversight.

Sincerely,



Melinda Walker
(206) 782-6355

ATTACHMENT OF PENNY RUBY

(350687)

Ruby, Penny

Email Address: utility@atg.wa.gov

Address:

P.O. Box 3921 292 Kitfox Lane
Sequim WA 98382

Address Type: Home

Phone: 360 683 1020

Phone Type: Home

Subject: Docket UT-240029

Message: Removing requirement for Century Link to obtain WUTC approval to discontinue or sell service in and area in the city of Sequim and surrounding Clallam County will put the many land line users service at risk. Sequim is an established retirement community and many retirement age persons do not have the background and/or resources to develop alternatives to their existing equipment and current levels of service through this company.

I personally have maintained a landline on the Olympic Peninsula, in the Sequim area for more than 40 years and do not have an IT Department in my home to keep track of the "free market" pace of developments in telecommunications, nor the resources to purchase new equipment and pay for the attendant services, updates, downloads, etc. that further deregulation will bring. I know there are many others in this community similarly situated.

The systems for delivery of land services have developed over many years, and once allowed to erode, will be near, if not impossible to replace. This infrastructure can be considered to be essential as a public utility that delivers electricity, water, or waste management services.

Please do not grant this request for further deregulation.

Previous Contact: No

Date:

Regarding:

Declared By Name and Date:

Name: Penny Ruby

Date: 06/04/2024

Submitted on: 6/4/2024 6:23:56 PM