

April 26, 2017

# Via Electronic Filing Only

Gary Widerburg Commission Administrator Utah Public Service Commission Heber M. Wells Building, 4<sup>th</sup> Floor 160 East 300 South Salt Lake City, UT 84111 <u>psc@utah.gov</u>

<u>Re: Docket No. 17-R360-01</u>

Dear Mr. Widerburg:

Attached for filing please find CenturyLink's Comments, along with a Certificate of Service.

If you have any questions, please do not hesitate to contact me.

Sincerely,

Carla Butler Lead Paralegal

Attachment cc: Service List

> 310 SW Park Ave., 11<sup>th</sup> Flr. Portland, OR 97205 Tel. 503.242.5420 Fax. 503.242.8589 carla.butler@centurylink.com

Torry R. Somers CenturyLink 6700 Via Austi Pkwy. Las Vegas, NV 89119 Ph: (702) 244-8100 Fax: (702) 244-7775 torry.r.somers@centurylink.com

Attorney for CenturyLink

### **BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH**

In the Matter of the Utah Administrative Code R746-360 Universal Public Telecommunications Service Support Fund

DOCKET NO. 17-R360-01

### **CENTURYLINK COMMENTS**

#### I. INTRODUCTION

Qwest Corporation d/b/a CenturyLink QC and CenturyLink Communications, LLC ("CenturyLink") respectfully provide its comments and recommendations regarding the implementation of changes to the Utah Universal Service Fund (the "UUSF") as required by Senate Bill 130 (5<sup>th</sup> Substitute - "SB 130"). The Utah Legislature recently passed, and the Governor signed into law, SB 130. Among other things, SB 130 explicitly identifies who needs to contribute to the UUSF, requires the Public Service Commission of Utah ("Commission") develop a rule establishing the amount and method for how contributions to the UUSF are determined, and clarifies who can draw from the UUSF and for what purposes.

The Commission opened this docket to enact regulations consistent with SB 130. On March 27, 2017, in reference to the passage of SB 130, the Commission issued a *Request For Comments*. SB 130 requires the Commission to adopt a rule establishing the UUSF surcharge methodology before January 1, 2018. Recognizing the importance of establishing the method for UUSF contributions, the Commission indicated that it "is considering a July 2017 effective date for a rule amendment establishing the amount of the surcharge and mechanism for application..." CenturyLink fully supports the prioritization of this issue, and believes it can immediately be

addressed by the Commission, especially since many of these issues were presented to the Commission as part of Docket No. 16-R360-02.

As noted in the Request for Comments, there are other issues that should be addressed in rulemaking, and CenturyLink believes it is appropriate to address these on a separate track, so as not to delay the rule dealing with the amount of the surcharge and the mechanism for its application.

# II. SELECTING THE SURCHARGE MECHANISM AND AMOUNT OF THE SURCHARGE IS APPROPRIATELY THE COMMISSION'S TOP PRIORITY

CenturyLink agrees that the Commission's top priority is establishing a new surcharge mechanism for the UUSF.<sup>1</sup> Given the comments and reply comments filed last year as part of Docket No. 16-R360-02<sup>2</sup>, the Commission has already received information supporting a decision to impose a surcharge mechanism based on the number of lines and connections. It was CenturyLink's position that the Commission had this authority to impose a connection based approach, but there were other parties that raised doubts as to the Commission's jurisdiction. Following the passage of SB 130 there is no question that the Commission has the authority to adopt a surcharge mechanism based on the number of lines and connections, rather than based on revenue. Given the Commission's familiarity with this issue, and the ability for interested parties to file comments and reply comments<sup>3</sup> in this docket, the Commission should expeditiously make a determination that it should move to a connection based approach for the UUSF surcharge.

Once the Commission has made a decision on the surcharge mechanism, the Commission should schedule a technical conference to discuss implementation issues, including establishing an effective date for the change. A technical conference will help facilitate interested parties reaching consensus regarding implementation of the new surcharge mechanism.<sup>4</sup>

<sup>&</sup>lt;sup>1</sup> Senate Bill 130 requires the Commission develop the surcharge mechanism prior to January 1, 2018. The only other specific deadline in SB 130 is the annual reporting requirement by the Commission to be done prior to November 1. The first report is required by no later than October 31, 2017. Other necessary changes to the Commission's R746-360 (UUSF) and R746-341 (Lifeline) rules should happen after the Commission has first accomplished selecting the surcharge mechanism prior to the deadline.

<sup>&</sup>lt;sup>2</sup> Website link to Commission Docket No. 16-R360-2: https://psc.utah.gov/2016/06/27/docket-no-16-r360-02/

<sup>&</sup>lt;sup>3</sup> Reply comments are due to be filed by no later than May 11, 2017.

<sup>&</sup>lt;sup>4</sup> Some commenter's may suggest that a technical conference should first be conducted to discuss whether the per connection approach is appropriate. This would simply be another delay tactic, and put the Commission at risk of not meeting its statutory deadline.

During the technical conference the Commission can take input regarding the necessary amount of surcharge. The Commission has already requested that the Division of Public Utilities (Division) "*identify all access line providers, and connection providers that are subject to the surcharge.*" In addition the Division has been asked "*to estimate the number of connections that are subject to the surcharge, and to recommend the amount of the surcharge.*" During the technical conference the various parties will have the opportunity to review the Division's proposal for the surcharge amount, ask questions, and provide input. Based upon this discussion the Commission should be able to establish the effective date along with the initial surcharge amount.<sup>5</sup>

# III. A PER LINE AND PER CONNECTION BASED SURCHARGE IS A SUPERIOR SURCHARGE MECHANISM IN COMPARISON TO THE EXISTING PERCENTAGE OF REVENUE BASED SURCHARGE

Last year the Commission was faced with the problem of having to increase the UUSF surcharge to 1.65%. This increase was due to decreasing assessable intrastate revenues, and not because of increasing demands on the UUSF. The decline in UUSF revenues occurred because UUSF revenues are based on the application of a surcharge percentage to *intrastate retail telecommunications revenues*. These revenues are eroding; there has been a significant decline in CenturyLink and other ILEC intrastate revenues that are subject to the UUSF surcharge due to the evolution of technology and customer preferences. First, there continues to be a significant shift from traditional phone lines to wireless, cable and other Voice over Internet Protocol ("VoIP") based services, as demonstrated by the 60% decline in CenturyLink access lines over the last ten years in Utah,<sup>6</sup> and the fact that as of the first half of 2015, nearly one half of American homes — 47.4%— had only wireless phones.<sup>7</sup> Second, even when customers retain CenturyLink or other ILEC services, there is a migration from traditional intrastate regulated retail services to advanced services that are not subject to intrastate regulation.

<sup>&</sup>lt;sup>5</sup> The implementation would also include combining the existing Telecommunications Relay Service surcharge with the USF surcharge.

<sup>&</sup>lt;sup>6</sup> CenturyLink retail access lines have declined over 60% in the last ten years, from 835,958 in December 2005 to 318,234 in December 2015. (Update these numbers.)

<sup>&</sup>lt;sup>7</sup> Wireless Substitution: Early Release of Estimates From the National Health Interview Survey, January–June 2015, NHS Early Release Program, Released December, 2015, page 1. See: <u>http://www.cdc.gov/nchs/nhis/releases.htm</u>

When customers migrate from traditional wireline phone services to wireless, cable or other VoIP services, some of the revenues obtained by these providers may be subject to the UUSF surcharge based upon a percentage of intrastate retail telecommunications revenues. However, it is clear that the UUSF surcharge revenues derived from wireless and VoIP services to date have provided an inadequate replacement for the revenues derived from traditional voice services.

Even though the wireless market continues to grow, the Division, who tracks and monitors the UUSF, told CenturyLink last summer, prior to the October 1, 2016 surcharge increase, that the total UUSF surcharge revenue submitted by the wireless providers has declined significantly in the last few years.<sup>8</sup>

In sum, the traditional intrastate voice services that provided UUSF revenues in the past have in large part been replaced by alternative voice services that provide either a lower level of UUSF surcharge revenues or no revenues at all for the UUSF. This accounts for the decline in UUSF Revenues last year before the surcharge increase.

SB 130 now requires VoIP to pay into the UUSF. If the Commission stays with a percentage of revenue based surcharge it will need to determine what VoIP revenues are subject to the UUSF. For example Exhibit B provides a copy of an Ooma VoIP service customer bill. As shown on the bill, Ooma does not charge for "Base Phone Service" and the only charges for taxes, fees and surcharges. In situations like this the Commission would need to establish a fixed charge so Ooma pays into the UUSF.<sup>9</sup> The Commission will not need to determine how to specifically assess VoIP if it moves to a connection based approach.

SB 130 requires that the UUSF not discriminate and be competitively neutral. The existing revenue based approach discriminates against different types of providers and is not competitively neutral. A per line and per connection surcharge methodology does the following:

- Eliminates the impact of revenue shifting between voice and data services.
- It ties the UUSF surcharge to a growing base and not a declining base. Overall lines and connections are increasing. Exhibit C provides information, based upon

<sup>&</sup>lt;sup>8</sup> An explanation for the decline in assessable revenues is attached hereto as Exhibit A.

<sup>&</sup>lt;sup>9</sup> This would result in a hybrid method where some services/providers pay UUSF on a percentage of revenue based approach and other providers pay a fixed surcharge amount on a per line or per connection based approach.

FCC data which shows that overall lines and connections are increasing. In comparison intrastate retail telecommunications revenues have declined and are expected to continue to decline.

- A per line and per connection surcharge will be more stable in comparison to the percentage of revenue based surcharge, thus decreasing the need to continually increase the surcharge.<sup>10</sup>
- Will be easier to administer and simpler to audit once it is implemented.<sup>11</sup>

The current revenue based surcharge approach is obsolete and the Commission should move to a per line/per connection surcharge.<sup>12</sup> Based on declining revenues it is apparent that the current revenue based approach cannot continue. The Commission has considered a connection based approach in the past, and now that it is clear it has the authority to implement this approach it should do so. The details regarding implementation can be discussed at a technical conference.

#### **IV. OTHER CHANGES TO THE UUSF RULES**

While this proceeding is designed to first address the UUSF surcharge methodology, CenturyLink believes the Commission should also consider other changes to its UUSF rules. For example, CenturyLink believes the existing rule (R746-360-9) relating to one time distributions should be amended, so that funds can be more efficiently dedicated to specific projects that would benefit Utah consumers in high cost areas. The Commission also needs to make changes to its R746-341 (Lifeline) rules.

While it is not practical for the Commission to address these other UUSF and Lifeline issues in the initial phase of this proceeding, given the deadline for implementing the surcharge

<sup>&</sup>lt;sup>10</sup> There will be a number of changes to the UUSF rules as a result of SB 130. Some of these changes most likely will increase the amount of UUSF required. At this time it is too early to understand the impact of these changes and whether these will at least be partially offset since VoIP providers are now required to pay into the UUSF. With either surcharge methodology there will likely need to be adjustments to the surcharge until full implementation of the changes.

<sup>&</sup>lt;sup>11</sup> It will be more difficult for the Division of Public Utilities to audit the revenues of providers. For example an auditor would need to look at in detail the various revenues to ensure all revenues subject to the UUSF are included. In comparison it will be less complicated for an auditor to review the number counts of lines and connections of a provider.

<sup>&</sup>lt;sup>12</sup> The Commission already successfully uses a per line/per connection approach with the Telecommunications Relay Service (TRS) surcharge. Pursuant to SB 130, the TRS is now funded through the UUSF.

mechanism, CenturyLink believes the Commission should address these issues in a subsequent rulemaking phase.

At this time CenturyLink is not providing detailed comments regarding the other necessary changes to the Commission's R746-360 and R746-341 rules. CenturyLink respectfully request that the Commission provide interested parties an opportunity for comments at a later date.

# V. CONCLUSION

CenturyLink respectfully requests that the Commission adopt the recommendations provided herein, and move to a per line/per connection UUSF surcharge.

RESPECTFULLY SUBMITTED this 26th day of April 2017.

CENTURYLINK

mens

Torry R. Somers 6700 Via Austi Pkwy. Las Vegas, NV 89119 Ph: (702) 244-8100 Fax: (702) 244-7775 torry.r.somers@centurylink.com

Attorney for CenturyLink

# EXHIBIT A CENTURYLINK'S COMMENTS April 26, 2017 DOCKET NO. 17-R360-01

# REASONS WHY THE UTAH PUBLIC SERVICE COMMISSION ENDED UP HAVING TO INCREASE THE UUSF SURCHARGE FROM 1.0% TO 1.65%, EFFECTIVE OCTOBER 1, 2016

Payments into the USF were down significantly causing a shortfall and a need to increase the UUSF surcharge.

#### **Reasons:**

- Traditional phone lines continue to decline.
  - More customers are changing to wireless and Voice over Internet Protocol (VoIP) for their voice service needs.
    - Wireless pays into the USF and not all VoIP providers pay.<sup>1</sup>
- Wireless payment into the USF is down significantly even though wireless continues to grow as an industry.
  - Explanation: CTIA The Wireless Association: Reply Comments PSC Docket No. 16-R360-02:

(Website Link: http://www.psc.utah.gov/utilities/Rules/Rules%20Index/16R36002indx.html)

- Wireless customer shifting to services not subject to the USF.
  - Shifting to data, video-chat, video calling, messaging and social media applications, etc.
  - Reducing wireless rates due to competition.
  - Plan changes, decoupling equipment revenue from voice revenue.
  - New alternatives for financing equipment, no contracts, leasing options, etc.

<sup>&</sup>lt;sup>1</sup> With SB 130, VoIP is now required to pay the UUSF.

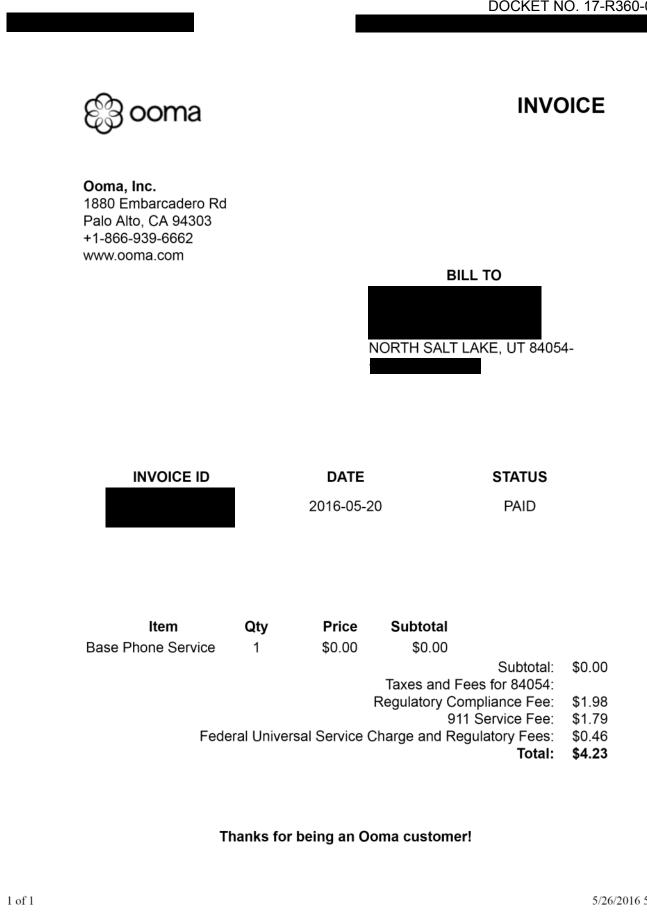


EXHIBIT C CENTURYLINK'S COMMENTS April 26, 2017

Interference     Jame		April 2 <del>NO: 17-R</del>	OCKET N	h Do	Supplemental Table 1. Voice Subscriptions (in Thousands) - Uta	
2     Directly-billed prepaid     182     2.479     2.449       3     Not directly-billed prepaid     182     188     198       4     Wireline End User Switched Access Lines and Interconnected VoIP Subscriptions.     480     485     485       5     Incamben LECA.     425     431     444       6     Other (Non-ILECA). Note: ILEC voice-service affiliate operating outside ILECs study area is included here.     435     442       7     Consume-guida service     193     DM4     188     406       8     Incombent LECs     193     DM4     188     406       10     Brainses & Government guida service     195     461     430       11     Incombent LECs     232     223     220     220     200     200     200     200     200					Data element	eference
3     Nor directly-billed or pequal     182     185     198       4     Witchine Ead-User Switched Access Lines and Inarconnected VaIP Subscriptions     442     453     443     444       6     Other (Non-ILC) - Note: ILEC vasce-service affiliate operating outside ILEC's study area is included here.     435     421     411       7     Consumer gabe service     436     421     411       8     Fourmeent ILCS     192     344     488       9     Other (Non-ILICS)     192     344     488       10     Incumbent ILCS     222     227     2221       12     Other (Non-ILICS)     243     336     440       14     Incumbent LECS     386     388     4450       15     Other (Non-ILICS)     243     237     237       14     Incumbent LECS     380     402     101     212       15     Other (Non-ILICS)     380     418     418     418       16     Consummer gabe service     291     101     1214     116     1164	20	2,620	2,664	2,751	Mobile telephony	1
4     Wireline End User Switched Access Lines and Interconnected VolP Subscriptions     860     852     855       5     Incumbent LECs     425     431     444       6     Other (Non-LECs) - Nore: IEEC vacies affiliate opening oaside IEEC's study area is included here.     436     436       7     Consumer-guide service     336     388     405       8     Incumbernt LECs     192     134     234     227       9     Other (Non-LECs)     192     134     138       10     Incumbernt LECs     232     227     221     222     221     226     222     221     221     0     236     422     421     421     421     421     421     421     421     421     421     421     421	21	2,421	2,479	2,569	Directly-billed or prepaid	2
5   Incombent LCs   445   431   444     6   Other (Non-LLCs)-Note: LEC voice affiliate opensing conside ILEC's study area is included here.   445   431   441     7   Consumer grade service   198   198   198   198   198   198   198   198   198   198   198   198   198   198   198   198   192   198   198   198   198   198   192   192   198   198   192   192   192   198   198   192   192   292   222   227   222   227   198   198   198   198   198   198   198   198   198   198   198   198   198   198   198   199   191   199   191   190   191   199   191   190   191   190   191	98	198	185	182	Not directly-billed or prepaid	3
6     Other (Non-ILEC) - Note: ILEC visios-service affiliate operating outside ILEC's study area is included here.     438     421     411       7     Consumer grade service     192     204     277       9     Other (Non-ILEC)     192     2144     188       10     Busines & Georement aguals service     222     2227     2227       11     Incombern LEC     223     223     222       12     Other (Non-ILEC)     243     236     222       13     Local exchange telephone service (Switched Access Lines)     466     477     597       14     Incounter ILCO     706     233     201     225       15     Other (Non-ILEC)     456     477     390     402       15     Other (Non-ILEC)     456     471     301     204     215       16     Consumer grade service     238     301     204     215       16     Consumer grade service     238     301     301     301       17     Incombert ILCS     88     182     186	55	855	852	860	Wireline End-User Switched Access Lines and Interconnected VoIP Subscriptions	4
7   Consumer gale service   386   388   406     8   Incumbent LECs   192   194   188     10   Business & Government gale service   192   194   188     10   Business & Government gale service   192   194   188     10   Business & Government gale service   225   227   227     11   Incumbent LECs   245   225   222     13   Incol sectiongs telephone service (Switched Access Lines)   456   477   597     14   Incommer gale service   201   210   225   121   198   046   210   225     15   Other (Non-ILECs)   Note: ILEC voice service affiliate operating outside ILEC's study area is included here.   91   210   225	44	444	431	425	Incumbent LECs	5
8     Incumber ILECs     191     290     041     191     291     184     183       10     Business & Government-gade service     245     455     222     227       11     Onter (Non-ILECs)     243     256     222     227       13     Local exchange talsphone service (Switched Access Lineo)     243     256     222       13     Local exchange talsphone service (Switched Access Lineo)     245     477     507       14     Incumbent LECs     363     400     400     253     477     108       15     Other (Non-ILECs). Note: ILEC voice-service affiliate operating outside ILEC's study area is included here.     931     204     217       18     Other (Non-ILECs)     188     6     8     6     8       21     Other (Non-ILECs)     170     176     184     375     348       23     Incumbent LECs     188     178     189     184       24     Other (Non-ILECs)     184     196     184     234     335     348	11	411	421	435	Other (Non-ILECs) - Note: ILEC voice-service affiliate operating outside ILEC's study area is included here.	6
9     Other (Non-ILECs)     192     184     188       10     Busines & Government gude service     475     483     502       11     Incumbent LECs     223     227     223     227       12     Other (Non-ILECs)     245     223     227     227       13     Local exchange telephone service (Switched Access Lines)     445     477     363     389     402       14     Incumbent LECs     Note: ILEC vice-service affiliate operating outside ILEC's study area is included here.     91     210     225     207     188     014     210     225     207     225     207     225     207     225     207     225     207     225     207     226     227     225     207     225     207     225     207     225     207     225     207     225     207     225     207     225     207     225     207     228     225     207     228     225     207     228     225     207     228     225     <	05	405	388	386		7
10     Busines & Government gade service     475     445       11     Incumbent IECs     221     225       12     Other (Non-ILECs)     218     226       13     Local exchange telephone service (Switched Access Lines)     445     477     507       14     Incumbent IECs     368     368     402       15     Other (Non-ILECs)     368     402     201	17	217			Incumbent LECs	
11     Lecankent LFCS     232     227     227       12     Other (Non-ILECs)     245     226     2221       13     Lecan exchange telephone service (Switched Access Lines)     456     477     597       14     Incambern LECs     363     380     402       15     Other (Non-ILECs) - Note: ILEC voice-service affiliate operating outside ILEC's study area is included here.     93     204     215       16     Consume-grade service     193     204     217     198     204     217       18     Other (Non-ILECs)     8     6     8     8     6     8       19     Business & Government-gade service     225     267     282       20     Incombent LECs     63     51     43       21     Other (Non-ILECs)     63     51     43       22     Interconnected VolP Subscriptions - Note: Includes both Over-floc-top (OTT) and All Other sub-sategorizes.     404     375     548       23     Incombern LECs     63     51     43     305       24     Other					Other (Non-ILECs)	
12   Other (Non-ILECs)   243   236   222     13   Local exchange telephone service (Switched Access Lines)   456   477   907     14   Incumbent LECs   363   380   402     15   Other (Non-ILECs)   361   210   210   225     18   Other (Non-ILECs)   193   204   217     18   Other (Non-ILECs)   193   204   217     18   Other (Non-ILECs)   193   204   217     19   Business & Government-grade service   212   225   227   225     20   Incombent LECs   170   176   184     21   Other (Non-ILECs)   88   91   97     22   Incombent LECs   63   51   43     34   Other (Non-ILECs)-Note: ILEC voice-service affiliate operating outside ILEC's study area is included here.   324   326     23   Incombent LECs   185   178   180     24   Other (Non-ILECs)-Note: ILEC voice-service affiliate operating outside ILEC's study area is included here.   345   145     34   Ot						
13     Local exchange helphone service (Switched Access Lines)     456     477     977       14     Incumbent LECs)     366     380     400       15     Other (Non-ILECs) - Note: ILEC voice-service affiliate operating outside ILEC's study area is included here.     36     380     402       18     Other (Non-ILECs)     193     204     217     105     105       18     Other (Non-ILECs)     193     204     217     106     106     225     207     282       19     Business & Government-gade service     107     176     184     10     107     176     184       20     Incombent LECs     107     176     184     14     375     538       21     Interconnected VolP Subscriptions - Note: Includes both Over-the-top (OTT) and All Other sub-categories.     404     375     538       23     Incombent LECs     63     51     43     306       24     Other (Non-ILECs) - Note: ILEC voice-service affiliate operating outside ILEC's study area is included here.     342     306       25     Locambent LECs     <						
14   Incumber ILCS   330   330   402     15   Other (Non-ILCS)- Note: ILCC voice-service affiliate operating outside ILEC's study area is included here.   93   97   105     16   Consumer-grade service   193   204   2217     18   Other (Non-ILECs)   193   204   2217     18   Other (Non-ILECs)   193   204   2217     21   Innoumbent LECs   193   204   2217     21   Other (Non-ILECs)   85   91   97     22   Interconnected VoIP Subscriptions - Note: Includes both Over-the-top (OTT) and All Other sub-categories.   404   375   348     23   Incumbern LECs   68   51   43     24   Other (Non-ILECs) - Note: ILEC voice-service affiliate operating outside ILEC's study area is included here.   63   51   43     24   Other (Non-ILECs)   185   178   180     25   Consumer-grade service   185   178   180     26   Incumbernt LECs   0   0   0   0     29   Incumbernt LECs   185   178   180 <td>22</td> <td>222</td> <td>230</td> <td>243</td> <td></td> <td>12</td>	22	222	230	243		12
15   Other (Non-ILECs) - Note: ILEC voice-service affiliate operating outside ILEC's study area is included here.   93   97   105     16   Consumer LECs   201   225     17   Incombert LECs   8   6   8     19   Business & Government gade service   255   2267   282     20   Incombert LECs   170   176   184     21   Other (Non-ILECs)   85   91   97     22   Interconnected VolP Subscriptions - Note: Includes both Over-the-top (OTT) and All Other sub-categories.   404   375   348     23   Incumbert LECs   404   375   348   348     24   Other (Non-ILECs) - Note: ILEC voice-service affiliate operating outside ILEC's study area is included here.   342   348   118   1						
16   Consumer grade service   201   201   202     17   Incumbent LECs   193   204   217     18   Other (Non-ILECs)   285   267   282     01   Incumbent LECs   170   184     20   Incumbent LECs   170   184     21   Other (Non-ILECs)   85   91   97     22   Interconnected VolP Subscriptions - Note: Includes both Over-the-top (OTT) and All Other sub-categories.   404   575   548     23   Incumbent LECs   63   51   435     24   Other (Non-ILECs) - Note: ILEC voice-service affiliate operating outside ILEC's study area is included here.   542   345     25   Consumer grade service   1185   178   180     26   Incumbent LECs   0   0   0     27   Other (Non-ILECs)   1157   145   135     28   Busines & Coronnement-grade service   63   51   43     30   Other (Non-ILECs)   0   -   -     31   Over-the-top interconnected VoIP   67   64   58						
17   Incumbent LECs   193   204   217     18   Other (Non HLECs)   8   6   8     19   Business & Government-grade service   255   267   282     20   Incumbent LECs   170   176   184     21   Other (Non-ILECs)   85   91   97     22   Interconnected VOIP Subscriptions - Note: Includes both Over-the-top (OTT) and All Other sub-categories.   404   575   348     23   Incumbent LECs   63   51   435     24   Other (Non-ILECs) - Note: ILEC voice-service affiliate operating outside ILEC's study area is included here.   342   324     26   Incumbent LECs   0   0   0     27   Other (Non-ILECs)   185   178   180     28   Busines & Government-grade service   220   197   168     29   Incumbent LECs   63   51   43     30   Other (Non-ILECs)   66   51   43     31   Over-the-top interconnected VoIP   67   64   58     32   Incumbent LECs   67   45<						
18     Other (Non-ILECs)     8     6     8       19     Busines & Government-grade service     255     267     282       20     Incumbent LECs     170     184       21     Other (Non-ILECs)     85     91     97       22     Interconnected VolP Subscriptions - Note: Includes both Over-the-top (OTT) and All Other sub-categories.     404     575     348       23     Incumbent LECs     63     51     43       24     Other (Non-ILECs) - Note: ILEC voice-service affiliate operating outside ILEC's study area is included here.     542     234     305       26     Incumbent LECs     0     0     0     0     0       27     Other (Non-ILECs)     185     178     180     185     178     180       28     Business & Government-grade service     63     51     43     30     Other (Non-ILECs)     65     51     43       30     Other (Non-ILECs)     65     51     44     33     16     45     45       31     Outher (Non-ILECs)     66 <td></td> <td></td> <td></td> <td></td> <td></td> <td></td>						
19     Business & Government-grade service     255     267     282       20     Incumbent LECs     170     176     184       21     Other (Non-ILECs)     88     91     97       22     Interconnected VoIP Subscriptions - Note: Includes both Over-the-top (OTT) and All Other sub-categories.     404     375     348       23     Incumbent LECs     63     51     43       24     Other (Non-ILEC) - Note: ILEC vice-service affiliate operating outside ILEC's study area is included here.     342     234     305       25     Consumer grade service     185     178     180       26     Incumbent LECs     0     0     0       27     Other (Non-ILECs)     185     178     180       28     Business & Government grade service     63     51     43       30     Other (Non-ILECs)     165     145     125       31     Over-the-top interconnected VoIP     67     64     58       32     Incumbent LECs     Note: (LECs) - Note: ILEC vice-service affiliate operating outside ILEC's study area is included here.     27	_					
20     Incumbent LECs     170     176     184       21     Other (Non-ILECs)     85     91     970       22     Interconnected VoIP Subscriptions - Note: Includes both Over-the-top (OTT) and All Other sub-categories.     404     35     1     348       23     Incumbent LECs     63     51     348       24     Other (Non-ILECs) - Note: ILEC voice-service affiliate operating outside ILEC's study area is included here.     342     305       25     Consumer-gaude service     185     178     180       26     Incumbent LECs     0     0     0       27     Other (Non-ILECs)     185     178     180       28     Business & Government grade service     220     197     168       29     Incumbent LECs     63     51     435       30     Other (Non-ILECs)     157     145     125       21     Incumbent LECs     0     -     -       31     Other (Non-ILECs)     0     -     -       32     Incumbent LECs     0     -						
21     Other (Non-ILECs)     85     91     97       22     Interconnected VoIP Subscriptions - Note: Includes both Over-the-top (OTT) and All Other sub-categories.     404     375     348       23     Incumbent LECs     63     51     443       24     Other (Non-ILECs) - Note: ILEC vice-service affiliate openting outside ILEC's study area is included here.     342     324     305       25     Consumer-grade service     185     178     180       26     Incumbent LECs     0     0     0       27     Other (Non-ILECs)     185     178     180       28     Business & Government-grade service     220     197     168       29     Incumbent LECs     63     51     43       30     Other (Non-ILECs)     157     145     125       31     Over-the-top interconnected VoIP     67     64     58       32     Incumbent LECs     0     -     -     -       33     Other (Non-ILECs)     28     27     28       34     Consumer-grade service						
23   Incumbent LECs   63   51   43     24   Other (Non-ILECs) - Note: ILEC voice-service affiliate operating outside ILEC's study area is included here.   342   324   305     25   Consumer-grade service   185   178   180     26   Incumbent LECs   0   0   0     27   Other (Non-ILECs)   185   178   180     28   Business & Government-grade service   220   197   168     29   Incumbent LECs   63   51   43     30   Other (Non-ILECs)   67   64   58     21   Incumbent LECs   0   -   -     31   Over-the-top interconnected VoIP   67   64   58     32   Incumbent LECs   0   -   -     33   Other (Non-ILECs) - Note: ILEC voice-service affiliate operating outside ILEC's study area is included here.   67   64   58     35   Incumbent LECs   0   -   -   -   -     36   Other (Non-ILECs)   28   27   28   28   37   30						
23   Incumbent LECs   63   51   43     24   Other (Non-ILECs) - Note: ILEC voice-service affiliate operating outside ILEC's study area is included here.   342   324   305     25   Consumer-grade service   185   178   180     26   Incumbent LECs   0   0   0     27   Other (Non-ILECs)   185   178   180     28   Business & Government-grade service   220   197   168     29   Incumbent LECs   63   51   43     30   Other (Non-ILECs)   67   64   58     21   Incumbent LECs   0   -   -     31   Over-the-top interconnected VoIP   67   64   58     32   Incumbent LECs   0   -   -     33   Other (Non-ILECs) - Note: ILEC voice-service affiliate operating outside ILEC's study area is included here.   67   64   58     34   Consumer-grade service   28   27   28   27   28     35   Incumbent LECs   0   -   -   -   -     36						
24     Other (Non-ILECs) - Note: ILEC voice-service affiliate operating outside ILEC's study area is included here.     342     324     305       25     Consumer-grade service     185     178     180       26     Incumbent LECs     0     0     0       27     Other (Non-ILECs)     185     178     180       28     Business & Government-grade service     220     197     168       29     Incumbent LECs     63     51     43       30     Other (Non-ILECs)     67     64     58       32     Incumbent LECs     0     -     -       31     Over-the-top interconnected VoIP     67     64     58       32     Incumbent LECs     0     -     -     -       34     Consumer-grade service     28     27     28       35     Incumbent LECs     0     -     -     -       36     Other (Non-ILECs)     39     37     30       37     Business & Government-grade service     39     37     30						
25     Consumer-grade service     185     178     180       26     Incumbent LECs     0     0     0     0       27     Other (Non-ILECs)     185     178     180       28     Business & Government-grade service     220     197     168       29     Incumbent LECs     63     51     43       30     Other (Non-ILECs)     157     145     125       31     Over-the-top interconnected VoIP     67     64     58       32     Incumbent LECs     0     -     -     -       33     Other (Non-ILECs). Note: ILEC voice-service affiliate operating outside ILEC's study area is included here.     66     4     58       34     Consumer-grade service     28     27     28     27     28       35     Incumbent LECs     0     -						
26     Incumbent LECs     0     0     0       27     Other (Non-ILECs)     185     178     180       28     Business & Government-grade service     220     197     168       29     Incumbent LECs     63     51     43       30     Other (Non-ILECs)     157     145     125       31     Over-the-top interconnected VoIP     67     64     58       32     Incumbent LECs     0     -     -       33     Other (Non-ILECs) - Note: ILEC voice-service affiliate operating outside ILEC's study area is included here.     67     64     58       34     Consumer-grade service     28     27     28       35     Incumbent LECs     0     -     -       36     Other (Non-ILECs)     28     27     28       37     Business & Government-grade service     39     37     30       38     Incumbent LECs     -     -     -     -       39     Other (Non-ILECs)     337     311     290						
27   Other (Non-ILECs)   185   178   180     28   Business & Government-grade service   220   197   168     29   Incumbent LECs   63   51   43     30   Other (Non-ILECs)   157   145   125     31   Over-the-top interconnected VoIP   67   64   58     32   Incumbern LECs   0   -   -     33   Other (Non-ILECs) - Note: ILEC voice-service affiliate operating outside ILEC's study area is included here.   67   64   58     34   Consumer-grade service   28   27   28     35   Incumbent LECs   0   -   -     36   Other (Non-ILECs)   28   27   28     37   Business & Government-grade service   39   37   30     38   Incumbent LECs   -   -   -     39   Other (Non-ILECs)   337   311   290     41   Incumbent LECs   63   51   43     42   Other (Non-ILECs)   63   51   43     43   Co						
28     Business & Government-grade service     220     197     168       29     Incumbent LECs     63     51     43       30     Other (Non-ILECs)     157     145     125       31     Over-the-top interconnected VoIP     67     64     58       32     Incumbent LECs     0     -     -       33     Other (Non-ILECs) - Note: ILEC voice-service affiliate operating outside ILEC's study area is included here.     67     64     58       34     Consumer-grade service     28     27     28       35     Incumbent LECs     0     -     -       36     Other (Non-ILECs)     28     27     28       37     Business & Government-grade service     39     37     30       38     Incumbent LECs     39     37     30       40     All Other (Non-ILECs)     337     311     290       41     Incumbent LECs     63     51     43       42     Other (Non-ILECs)     63     51     43       43						
29   Incumbent LECs   63   51   43     30   Other (Non-ILECs)   157   145   125     31   Over-the-top interconnected VoIP   67   64   58     32   Incumbent LECs   0   -   -     33   Other (Non-ILECs) - Note: ILEC voice-service affiliate operating outside ILEC's study area is included here.   67   64   58     34   Consume-rgade service   28   27   28     35   Incumbent LECs   0   -   -     36   Other (Non-ILECs) - Note: ILEC voice-service affiliate operating outside ILEC's study area is included here.   28   27   28     37   Business & Government-grade service   39   37   30     38   Incumbent LECs   -   -   -     39   Other (Non-ILECs)   337   311   290     41   Incumbent LECs   63   51   43     42   Other (Non-ILECs) - Note: ILEC voice-service affiliate operating outside ILEC's study area is included here.   275   260   248     43   Consume-grade service   157   151   152						
30   Other (Non-ILECs)   145   125     31   Over-the-top interconnected VoIP   67   64   58     32   Incumbent LECs   0   -   -     33   Other (Non-ILECs) - Note: ILEC voice-service affiliate operating outside ILEC's study area is included here.   67   64   58     34   Consumer-grade service   28   27   28     35   Incumbent LECs   0   -   -     36   Other (Non-ILECs)   0   -   -     36   Other (Non-ILECs)   28   27   28     37   Business & Government-grade service   39   37   30     38   Incumbent LECs   39   37   30     40   All Other (Non-ILECs)   337   311   290     41   Incumbent LECs   63   51   43     42   Other (Non-ILECs)   63   51   43     43   Consumer-grade service   157   151   152     44   Incumbent LECs   0   0   0   0     45   Other (Non-ILECs).<						
32   Incumbent LECs   0   -     33   Other (Non-ILECs) - Note: ILEC voice-service affiliate operating outside ILEC's study area is included here.   67   64   58     34   Consumer-grade service   28   27   28     35   Incumbent LECs   0   -   -     36   Other (Non-ILECs)   28   27   28     37   Business & Government-grade service   39   37   30     38   Incumbent LECs   -   -   -     39   Other (Non-ILECs)   39   37   30     34   Incumbent LECs   39   37   30     38   Incumbent LECs   39   37   30     40   All Other interconnected VolP   337   311   290     41   Incumbent LECs   63   51   43     42   Other (Non-ILECs) - Note: ILEC voice-service affiliate operating outside ILEC's study area is included here.   275   260   248     43   Consumer-grade service   157   151   152   44     44   Incumbent LECs   157   151 <td></td> <td></td> <td></td> <td></td> <td></td> <td></td>						
32   Incumbent LECs   0   -     33   Other (Non-ILECs) - Note: ILEC voice-service affiliate operating outside ILEC's study area is included here.   67   64   58     34   Consumer-grade service   28   27   28     35   Incumbent LECs   0   -   -     36   Other (Non-ILECs)   28   27   28     37   Business & Government-grade service   39   37   30     38   Incumbent LECs   -   -   -     39   Other (Non-ILECs)   39   37   30     34   Incumbent LECs   39   37   30     37   Business & Government-grade service   33   7   30     40   All Other interconnected VoIP   337   311   290     41   Incumbent LECs   63   51   43     42   Other (Non-ILECs) - Note: ILEC voice-service affiliate operating outside ILEC's study area is included here.   275   260   248     43   Consumer-grade service   157   151   152     44   Incumbent LECs   157   151 </td <td>50</td> <td>59</td> <td>64</td> <td>67</td> <td>Owar the tap interconnected VolD</td> <td>21</td>	50	59	64	67	Owar the tap interconnected VolD	21
33     Other (Non-ILECs) - Note: ILEC voice-service affiliate operating outside ILEC's study area is included here.     67     64     58       34     Consumer-grade service     28     27     28       35     Incumbent LECs     0     -     -       36     Other (Non-ILECs)     28     27     28       37     Business & Government-grade service     39     37     30       38     Incumbent LECs     -     -     -       39     Other (Non-ILECs)     39     37     30       40     All Other interconnected VoIP     337     311     290       41     Incumbent LECs     63     51     43       42     Other (Non-ILECs) - Note: ILEC voice-service affiliate operating outside ILEC's study area is included here.     275     260     248       43     Consumer-grade service     151     152     44     Incumbent LECs     0     0     0       44     Incumbent LECs     157     151     152     46     Business & Government-grade service     181     160     138	38		04			
34   Consumer-grade service   28   27   28     35   Incumbent LECs   0   -   -     36   Other (Non-ILECs)   28   27   28     37   Business & Government-grade service   39   37   30     38   Incumbent LECs   -   -   -     9   Other (Non-ILECs)   31   290     40   All Other interconnected VoIP   337   311   290     41   Incumbent LECs   63   51   43     42   Other (Non-ILECs) - Note: ILEC voice-service affiliate operating outside ILEC's study area is included here.   275   260   248     43   Consumer-grade service   157   151   152     44   Incumbent LECs   0   0   0     45   Other (Non-ILECs)   157   151   152     46   Business & Government-grade service   181   160   138     47   Incumbent LECs   63   51   43     48   Other (Non-ILECs)   157   151   152     46   Business & G	58	58	64			-
35     Incumbent LECs     0     -       36     Other (Non-ILECs)     28     27     28       37     Business & Government-grade service     39     37     30       38     Incumbent LECs     -     -     -       39     Other (Non-ILECs)     39     37     30       40     All Other interconnected VoIP     337     311     290       41     Incumbent LECs     63     51     43       42     Other (Non-ILECs) - Note: ILEC voice-service affiliate operating outside ILEC's study area is included here.     275     260     248       43     Consumer-grade service     157     151     152       44     Incumbent LECs     0     0     0     0       45     Other (Non-ILECs)     157     151     152       44     Incumbent LECs     157     151     152       45     Other (Non-ILECs)     157     151     152       46     Business & Government-grade service     181     160     138       47 <td></td> <td></td> <td></td> <td></td> <td></td> <td></td>						
36   Other (Non-ILECs)   28   27   28     37   Business & Government-grade service   39   37   30     38   Incumbent LECs   39   37   30     39   Other (Non-ILECs)   39   37   30     40   All Other interconnected VoIP   337   311   290     41   Incumbent LECs   63   51   43     42   Other (Non-ILECs) - Note: ILEC voice-service affiliate operating outside ILEC's study area is included here.   275   260   248     43   Consumer-grade service   157   151   152     44   Incumbent LECs   0   0   0     45   Other (Non-ILECs)   157   151   152     44   Incumbent LECs   157   151   152     45   Other (Non-ILECs)   181   160   138     46   Business & Government-grade service   181   160   138     47   Incumbent LECs   63   51   43     48   Other (Non-ILECs)   118   108   95     75 <td>-</td> <td></td> <td></td> <td></td> <td>8</td> <td></td>	-				8	
37   Business & Government-grade service   39   37   30     38   Incumbent LECs   -   -   -     39   Other (Non-ILECs)   39   37   30     40   All Other interconnected VoIP   337   311   290     41   Incumbent LECs   63   51   43     42   Other (Non-ILECs) - Note: ILEC voice-service affiliate operating outside ILEC's study area is included here.   275   260   248     43   Consumer-grade service   157   151   152     44   Incumbent LECs   0   0   0   0     45   Other (Non-ILECs)   157   151   152     46   Business & Government-grade service   181   160   138     47   Incumbent LECs   63   51   43     48   Other (Non-ILECs)   118   108   95     75   Non-Incumbent LEC local exchange telephone service by means of provisioning   93   97   105     76   Provided over owned last-mile facilities   15   16   18     77   Provided over UNE-L	28	28	27			
38   Incumbent LECs   -   -   -     39   Other (Non-ILECs)   39   37   30     40   All Other interconnected VoIP   337   311   290     41   Incumbent LECs   63   51   43     42   Other (Non-ILECs) - Note: ILEC voice-service affiliate operating outside ILEC's study area is included here.   275   260   248     43   Consumer-grade service   157   151   152     44   Incumbent LECs   0   0   0     45   Other (Non-ILECs)   0   0   0     46   Business & Government-grade service   181   160   138     47   Incumbent LECs   63   51   43     48   Other (Non-ILECs)   118   108   95     75   Non-Incumbent LEC local exchange telephone service by means of provisioning   93   97   105     76   Provided over owned last-mile facilities   15   16   18     77   Provided over other services obtained from unaffiliated entity   27   29   33     78   Provided over o	_					
40All Other interconnected VoIP33731129041Incumbent LECs63514342Other (Non-ILECs) - Note: ILEC voice-service affiliate operating outside ILEC's study area is included here.27526024843Consumer-grade service15715115244Incumbent LECs00045Other (Non-ILECs)15715115246Business & Government-grade service18116013847Incumbent LECs63514348Other (Non-ILECs)1181089575Non-Incumbent LEC local exchange telephone service by means of provisioning939710576Provided over owned last-mile facilities15161877Provided over other services obtained from unaffiliated entity27293378Provided over other services obtained from unaffiliated entity515154	-	-	-		8	
41Incumbent LECs63514342Other (Non-ILECs) - Note: ILEC voice-service affiliate operating outside ILEC's study area is included here.27526024843Consumer-grade service15715115244Incumbent LECs00045Other (Non-ILECs)15715115246Business & Government-grade service18116013847Incumbent LECs63514348Other (Non-ILECs)11810895T75Non-Incumbent LEC local exchange telephone service by means of provisioning939710576Provided over owned last-mile facilities15161877Provided over other services obtained from unaffiliated entity27293378Provided over other services obtained from unaffiliated entity515154	30	30	37	39	Other (Non-ILECs)	39
41Incumbent LECs63514342Other (Non-ILECs) - Note: ILEC voice-service affiliate operating outside ILEC's study area is included here.27526024843Consumer-grade service15715115244Incumbent LECs00045Other (Non-ILECs)15715115246Business & Government-grade service18116013847Incumbent LECs63514348Other (Non-ILECs)11810895T75Non-Incumbent LEC local exchange telephone service by means of provisioning939710576Provided over owned last-mile facilities15161877Provided over other services obtained from unaffiliated entity27293378Provided over other services obtained from unaffiliated entity515154	90	290	311	337	All Other interconnected VoIP	40
42   Other (Non-ILECs) - Note: ILEC voice-service affiliate operating outside ILEC's study area is included here.   275   260   248     43   Consumer-grade service   157   151   152     44   Incumbent LECs   0   0   0     45   Other (Non-ILECs)   157   151   152     46   Business & Government-grade service   181   160   138     47   Incumbent LECs   63   51   43     48   Other (Non-ILECs)   118   108   95						
43   Consumer-grade service   157   151   152     44   Incumbent LECs   0   0   0     45   Other (Non-ILECs)   157   151   152     46   Business & Government-grade service   181   160   138     47   Incumbent LECs   63   51   43     48   Other (Non-ILECs)   118   108   95     75     Non-Incumbent LEC local exchange telephone service by means of provisioning   93   97   105     76   Provided over owned last-mile facilities   15   16   18     77   Provided over owned last-mile facilities   15   16   18     77   Provided over other services obtained from unaffiliated entity   27   29   33     78   Provided over other services obtained from unaffiliated entity   51   51   54						
44   Incumbert LECs   0   0   0     45   Other (Non-ILECs)   157   151   152     46   Business & Government-grade service   181   160   138     47   Incumbent LECs   63   51   43     48   Other (Non-ILECs)   118   108   95     7     75   Non-Incumbent LEC local exchange telephone service by means of provisioning   93   97   105     76   Provided over owned last-mile facilities   15   16   18     77   Provided over owned last-mile facilities   15   16   18     77   Provided over other services obtained from unaffiliated entity   27   29   33     78   Provided over other services obtained from unaffiliated entity   51   51   54						
45   Other (Non-ILECs)   157   151   152     46   Business & Government-grade service   181   160   138     47   Incumbent LECs   63   51   43     48   Other (Non-ILECs)   118   108   95     75     Non-Incumbent LEC local exchange telephone service by means of provisioning   93   97   105     76   Provided over owned last-mile facilities   15   16   18     77   Provided over UNE-L obtained from unaffiliated entity   27   29   33     78   Provided over other services obtained from unaffiliated entity   51   51   54	_					
47Incumbent LECs63514348Other (Non-ILECs)1181089575Non-Incumbent LEC local exchange telephone service by means of provisioning939710576Provided over owned last-mile facilities15161877Provided over UNE-L obtained from unaffiliated entity27293378Provided over other services obtained from unaffiliated entity515154						
48   Other (Non-ILECs)   118   108   95     75   Non-Incumbent LEC local exchange telephone service by means of provisioning   93   97   105     76   Provided over owned last-mile facilities   15   16   18     77   Provided over UNE-L obtained from unaffiliated entity   27   29   33     78   Provided over other services obtained from unaffiliated entity   51   51   54	38	138	160	181	Business & Government-grade service	46
75Non-Incumbent LEC local exchange telephone service by means of provisioning939710576Provided over owned last-mile facilities15161877Provided over UNE-L obtained from unaffiliated entity27293378Provided over other services obtained from unaffiliated entity515154	_					
76Provided over owned last-mile facilities15161877Provided over UNE-L obtained from unaffiliated entity27293378Provided over other services obtained from unaffiliated entity515154	95	95	108	118	Other (Non-ILECs)	48
76Provided over owned last-mile facilities15161877Provided over UNE-L obtained from unaffiliated entity27293378Provided over other services obtained from unaffiliated entity515154	05	105	97	93	Non-Incumbent LEC local exchange telephone service by means of provisioning	75
77   Provided over UNE-L obtained from unaffiliated entity   27   29   33     78   Provided over other services obtained from unaffiliated entity   51   51   54						
78 Provided over other services obtained from unaffiliated entity 51 51 54						
93 End user buys local exchange telephone service and Internet access service from same entity 213 226 232					· · · · · · · · · · · · · · · · · · ·	
	32	232	226	213	End user buys local exchange telephone service and Internet access service from same entity	93
96 End user buys interconnected VoIP and Internet access service from same entity 298 269 252	52	252	260	200	End user huus interconnected VoIP and Internet access service from some antity	96

# CERTIFICATE OF SERVICE VIA EMAIL TRANSMISSION Docket No. 17-R360-01

I hereby certify that on the 26<sup>th</sup> day of April, 2017, I caused a true and correct copy of the foregoing CENTURYLINK'S COMMENTS to be served upon the following persons via electronic mail at the e-mail addresses shown below.

**Public Service Commission:** 

psc@utah.gov

### **Utah Division of Public Utilities:**

Justin Jetter – <u>jjetter@utah.gov</u> Bill Duncan – <u>wduncan@utah.gov</u> Chris Parker - <u>chrisparker@utah.gov</u> Erika Tedder – <u>etedder@utah.gov</u>

## **Office of Consumer Service:**

Michele Beck – <u>mbeck@utah.gov</u> Cheryl Murray – <u>cmurray@utah.gov</u>

CENTURYLINK

By: Carla M. Butler, Paralegal 310 SW Park Ave., 11<sup>th</sup> Flr. Portland, OR 97205 Telephone: 503-242-5420 Facsimile: 503-242-8589 e-mail: carla.butler@centurylink.com