



November 10, 2023

Sent Via Email - gwiderburg@utah.gov

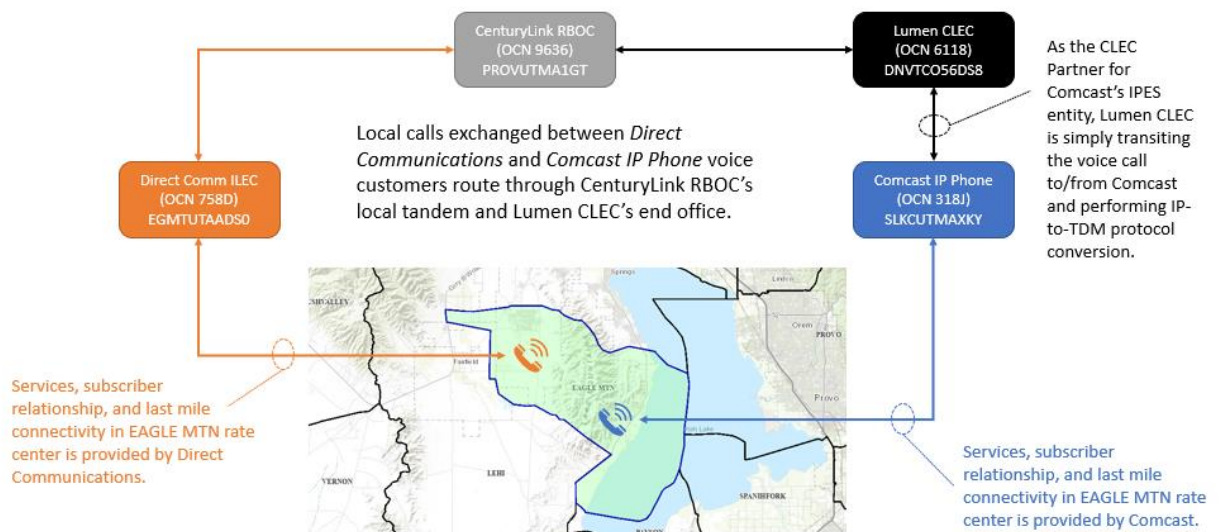
Gary Widerburg
Commission Secretary
Public Service Commission of Utah
160 East 300 South, 4th Floor
Salt Lake City, UT 84111

Mr. Widerburg:

I write on behalf of Comcast IP Phone, LLC (“Comcast”), a Voice over Internet Protocol (“VoIP”) provider that would like to begin providing service in Eagle Mountain, Utah to residential and business customers. This letter notifies the Public Service Commission of Utah (“PSC”) of Comcast’s planned interconnection arrangement to serve customers in the area and seeks confirmation from the PSC that the proposed interconnection arrangement is permissible.

Eagle Mountain is currently served by Direct Communications Cedar Valley, LLC (“Direct Communications”). Comcast and Direct Communications have tentatively agreed to exchange local voice traffic for their respective Eagle Mountain customers through a third party, Qwest Corporation d/b/a CenturyLink QC (“Lumen”). In this proposed arrangement, Lumen’s role would not be to provide service directly within Eagle Mountain but rather to transit Comcast’s traffic to and from Direct Communications as depicted below:

Proposed Voice Traffic Exchange between Direct Communications and Comcast IP Phone



Comcast and Direct Communications reached this tentative agreement after cooperating for several months to determine how they will exchange local voice traffic for their respective customers if Comcast begins providing service in Eagle Mountain. The companies initially explored the possibility of exchanging local traffic with each other directly, but given expected traffic volumes and the location of the potential interconnection point, the companies

agreed that direct interconnection would not be efficient or cost effective. Instead, Comcast and Direct Communications have agreed that each would be able to exchange local traffic through Lumen at an interconnection point in Provo, Utah. Direct Communications and a Lumen affiliate are already interconnected in Provo, and Comcast interconnects with Lumen in multiple places around the country. This traffic exchange arrangement would be simple, efficient, and cost-effective.

However, Lumen's Certificate of Public Convenience and Necessity ("CPCN") authorizing it to serve the State of Utah excludes exchanges with less than 5,000 access lines that are served by incumbent telephone corporations with fewer than 30,000 access lines in the state. Assuming that Eagle Mountain falls into this exclusion, we wish to make clear to the PSC that Lumen is permitted to facilitate the indirect exchange of local voice traffic between Comcast's and Direct Communications' Eagle Mountain customers. Lumen will not provide service to end users in Eagle Mountain, nor will it have facilities in Eagle Mountain. Accordingly, Lumen will not itself be serving Eagle Mountain. This letter does not constitute an agreement by Direct Communications to amend its or Lumen's Certificates of Convenience and Necessity. Please let us know if you have any concerns with Lumen's role in this interconnection arrangement.

Thank you in advance for your consideration of this request. We would appreciate the opportunity to schedule a meeting or call with you or other members of the Commission's Staff to provide additional information or answer any questions you may have.

Sincerely,

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