

June 20, 2023

*Via Email: psc@utah.gov
And UPS Overnight*

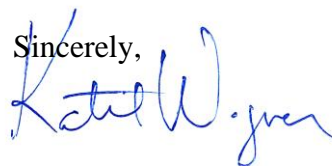
Gary Widerburg
Commission Administrator
Utah Public Service Commission
Heber M. Wells Building, 4th Floor
160 East 300 South
Salt Lake City, UT 84111

**RE: Docket No. 23-049-01
Petition for Exemption from the Carrier of Last Resort Obligation**

Dear Mr. Widerburg:

Attached for filing please find Qwest/CenturyLink's Petition for Exemption from the Carrier of Last Resort Obligation. A Motion to Deviate From Electronic Filing Requirements will be forthcoming via UPS to include Confidential Exhibit 4.

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

Sincerely,


Katie Wagner
Senior Corporate Counsel

Attachments

Cc: Max Backlund

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

<p>In the Matter of</p> <p>QWEST CORPORATION d/b/a CENTURYLINK QC</p> <p>Petition for Statewide Exemption from Carrier of Last Resort Obligations</p>	<p>Docket No. 23-049-01</p> <p>Petition for Exemption from the Carrier of Last Resort Obligation</p>
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PETITION

Qwest Corporation d/b/a CenturyLink QC (“CenturyLink” or “the Company”) requests that the Commission exempt it in whole, or in the alternative in part, pursuant to Utah Code § 54-8b-3(1)(a), from the carrier of last resort obligation (“COLR”) as defined in Utah Code § 54-8b-15(1)(b).

Utah’s COLR obligations currently require that CenturyLink provide public voice telecommunication service to any new customer that requests voice service within a given local exchange. *See* Utah Code § 54-8b-15. This Petition does not seek relief from discontinuance regulations to terminate services to existing customers. Rather, on a forward-looking basis, this petition seeks relief from the obligation to provide voice service to every new customer location regardless of the cost of service.

The state of Utah has not provided high-cost support to CenturyLink, and the federal government stopped providing CenturyLink federal universal support funding in 2022. As result, CenturyLink now receives zero federal or state universal service support in its high-cost areas in Utah. With no supportive funding for the COLR obligations in CenturyLink’s service territory, either from the federal government or the State of Utah, the company should not be obligated to be a COLR.

Additionally, relief from COLR obligations is warranted because effective competition exists throughout CenturyLink's service territory, which supports that COLR relief, is in the public interest. Competing telecommunication carriers are available to provide functionally equivalent or suitable services, as substantiated by consumer demand, in CenturyLink's service territory. This is consistent with COLR relief that CenturyLink has been granted in other states, including Utah's neighbors Wyoming and Colorado. As a result of obtaining COLR relief, CenturyLink will be able to devote resources towards modernizing infrastructure to the benefit of all Utah citizens. Basing decisions on market principles rather than outdated regulatory obligations from the monopoly era is prudent, reasonable, and necessary.

COLR relief will not harm the public interest because existing customers will continue to receive telephone service. COLR relief can be erroneously conflated with discontinuance of service. COLR is a requirement to serve new customers while maintaining service to existing customers. Discontinuance of service means terminating service to existing customers. Combining these two concepts can lead to a belief that each individual location must be evaluated for effective competition to determine if any of those locations could be deemed "a captive customer". The concept of captive customer is only applicable when a provider seeks to discontinue service to a specific location. Granting COLR relief does not harm the public interest because existing customers are not impacted by a provider receiving COLR relief.¹

If the Commission decides to grant COLR relief on a location-by-location basis, then CenturyLink should also be able to access the state's Universal Service Fund. It is unclear if that support would need to be ongoing (annually) or through a one-time draw. Financial support

¹ A new resident at an existing location would be considered a new customer. However, it would be rare that the company would not be able to provide the new resident with voice service, which is the service subject to COLR. Although most new customers do not order only voice service and if that location did not have internet service available from CenturyLink, that customer would not likely order the voice service.

through the state's USF would allow CenturyLink to maintain the COLR obligation for high-cost locations.

I. HISTORICAL BACKGROUND

CenturyLink is a non-rate of return regulated carrier of last resort provider of telecommunications in the state of Utah.² CenturyLink has provided local telephone service to customers in Utah for decades. It began as a traditional telephone utility and later received varying degrees of regulatory relief under both Utah statutes and Commission rules. The Company moved from rate-of-return regulation to a price index mechanism in the late 1990s. Beginning in 1995, the legislature reduced and then eliminated rate of return regulation for CenturyLink, reflecting the fact that competition in the marketplace was more than sufficient to govern the prices. Later, the Company was relieved from certain service quality requirements, which the Commission then eliminated from its rules, showing that the competitive marketplace would ensure reasonable prices for service and high-quality service. CenturyLink does have some limited relief in its line extension tariff, which allows the company to charge reasonable costs to provide plain old telephone services (POTS), for building out new service where an investment would not be prudent, but it is still subject to the COLR obligation and must generally accept requests for new service across its service area. Relief from the COLR obligation is the next step in the evolution of modernizing telecommunications regulation.

² *Report and Order, Case No. 5413, Mountain States Telephone and Telegraph Company*, Public Service Commission of Utah (June 1, 1964).

A. IN CENTURYLINK’S WIRE CENTERS THE COLR OBLIGATION IS AN OUT-DATED AND UNNECESSARY REGULATORY PARADIGM

The COLR requirement was one of the three pillars of the “regulatory compact.”³ The pillars include: (1) An assurance from the state that the utility would have a monopoly in its market; (2) a guarantee to the utility of a reasonable return on its investment; and (3) the COLR, a commitment from the utility to offer service to all customers in its designated service territory.

The demise of the regulatory compact began decades ago when Congress passed the Telecommunications Act of 1996 (“the Act”),⁴ opening the market for local telecommunications service to competitors. Although Congress established mechanisms like a universal service fund to lessen the harm to ILECs that resulted from opening the market to competition, these mechanisms are no longer available to support legacy regulatory obligations within a competitive marketplace. Requiring CenturyLink to bear significant uneconomic and unrecoverable financial burdens constitutes a regulatory taking, is not sensible, distorts the marketplace, and is discriminatory.⁵

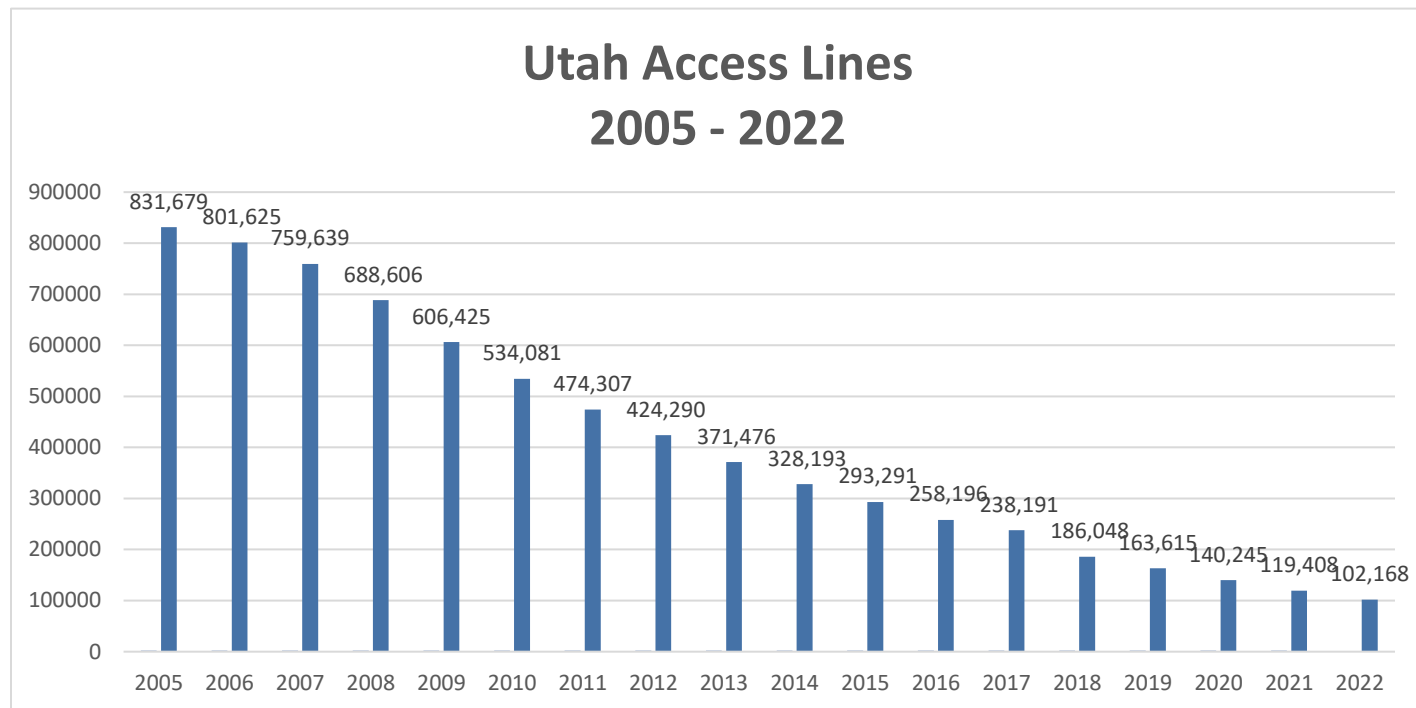
When the regulatory compact was functional, CenturyLink was ensured a monopoly in the market for basic local telephone service. The monopoly allowed the Company to recover the costs of providing telephone service in disproportionately high-cost areas where population density was low, despite the high cost of providing telephone service in those areas – this ensured that it would earn a reasonable return on its investment across the entire market. Because of competition, CenturyLink’s market share has dramatically shrunk in both low- and high-cost areas, but especially in low-cost areas. Revenues from low-cost areas traditionally

³ *Deregulatory Takings and Breach of the Regulatory Compact*, 71 N.Y.U.L Rev. 851 (1996).

⁴ Telecommunications Act of 1996, Pub. LA. No. 104-104, 110 Stat. 56 (1996).

⁵ Clark, T. and Martinez, M. (2019). The More Things Change the More Things Need to Change: Why New Realities Require New Rules. Retrieved from: <https://www.ustelecom.org/wp-content/uploads/2019/09/More-Things-Change-Report.pdf>.

allowed the Company to recover the costs of serving in high-cost areas:⁶



Because implicit rate subsidies and explicit universal service funding have been eliminated for CenturyLink, the COLR obligation is unreasonable, uneconomic, and unsustainable for the company.

B. THE TELECOMMUNICATIONS ACT OF 1996 ULTIMATELY FAILED TO EASE THE IMPACT OF COMPETITION ON ILECS, EVEN THOUGH IT REQUIRED COMPETITORS TO PAY ILECS WHOLESAL PRICES FOR ACCESS TO ILEC NETWORKS AND CREATED THE FEDERAL UNIVERSAL SERVICE FUND.

The collapse of the regulatory compact for telecommunications utilities did not occur as an immediate consequence of the passage of the Act. At that time very little facilities-based competition existed and it took some time for it to fully develop. The Act required ILECs to

⁶ See, Exhibit 2 - Utah CenturyLink Access Line Chart 2005 through 2022; see also, Exhibit 3 – Share of Utah Voice Connections.

allow competitive local exchange carriers (“CLECs”) to lease ILEC networks on a wholesale basis to promote competition.⁷ Congress attempted to help ILECs recover the new costs associated with providing wholesale service to competitors. These efforts, though well intended, have not been enough to reduce the impacts of competition and still maintain monopoly era regulations.

C. DESPITE THE FCC’S EFFORTS, COMPETITION HAS CONTINUED TO ERODE IMPLICIT SUPPORT FOR HIGH-COST AREAS.

Although the FCC established an explicit FUSF to address the loss of implicit support for high-cost areas, that funding has been insufficient for price cap carriers like CenturyLink to expand and modernize networks in high-cost areas. Section 254 of the Act established the federal universal service fund (“FUSF”) to help ILECs recover the disproportionately high cost of serving rural areas.⁸ Unlike the implicit subsidies that resulted from traditional ratemaking, the FUSF was an explicit subsidy – ILECs received funding for serving high-cost areas as a direct payment. ILECs had to certify that they were using the funding “only for the provision, maintenance, and upgrading of facilities and services for which the support is intended.”⁹ Much of that funding was utilized to maintain existing rural networks that were more costly to maintain.

More recently, the FCC established the Connect America Fund (“CAF”) and later the CAF II, to replace the traditional FUSF. These subsidy programs provided federal funding to ILECs that certified they were using the subsidies appropriately to support voice and broadband service in specific areas defined by census block. For higher cost areas, the FCC used a reverse

⁷ 47 U.S.C. §§ 251 and 252.

⁸ 47 U.S.C. § 254.

⁹ 47 U.S.C. § 254(E).

auction where the lowest bidder won the subsidy and assumed the obligation to offer broadband and voice service in unserved or underserved areas. CAF recognized that consumers demand broadband internet above traditional telephone service provided on a copper wire, and that can be used for voice telephony with a voice over internet protocol (“VoIP”) connection, which is offered by numerous companies both nationally and in Utah.¹⁰ Utah VoIP providers account for approximately 15% of voice connections in the state.¹¹

CAF II was then replaced by the Rural Digital Opportunity Fund (“RDOF”), which also relied on an auction process to support voice *and* broadband in high-cost locations at higher speeds than CAF required.¹² Unlike the CAF, where ILECs had the right of first refusal in the funding grants, the RDOF was made available to all providers. In addition, the FCC has established a process for ILECs to petition for elimination of the equivalent federal COLR obligation in areas where a competitor provides service using RDOF funding.¹³

CenturyLink’s federal universal funding was last provided in 2021 when it received \$1.89M in Utah. With the advent of RDOF in 2022, CenturyLink now receives zero federal universal service support to maintain telephone service in its high-cost areas in Utah. In addition, once the FCC reallocates the RDOF that it initially granted to Starlink,¹⁴ those subsidized competitors will build new networks in CenturyLink territories, further eroding CenturyLink’s market share by replacing CenturyLink as the federal eligible

¹⁰ According to the FCC, there are over 1,100 over-the-top interconnected VoIP providers in the United States that customers can choose from. See <https://www.fcc.gov/voice-telephone-services-report>. See also, Exhibit-3 - Share of Utah Voice Connections (2021).

¹¹ See Exhibit 3.

¹² See <https://www.fcc.gov/auction/904> for more information regarding the RDOF.

¹³ In the Matter of Rural Digital Opportunity Fund, Connect America Fund, WC Docket No. 19-126; WC Docket No. 10-90, 35 FCC Rcd 686, 743-746, ¶¶ 133-139 (January 30, 2020).

¹⁴ <https://www.fcc.gov/document/fcc-rejects-ltd-broadband-starlink-bids-broadband-subsidies>.

telecommunications provider.

D. THROUGH ACCESS CHARGE REFORM, ILECS LOST ANOTHER FORM OF IMPLICIT SUBSIDY THAT SUPPORTED THE PROVISION OF BASIC TELEPHONE SERVICE IN HIGH-COST AREAS.

ILECs have historically charged interexchange carriers to use an ILEC network for long-distance calls, which creates an implicit subsidy that helped ILECs provide affordable telephone service in high-cost areas. However, the 1996 Act changed that regime by directing the FCC to create an explicit FUSF to replace those implicit subsidies.

Congress intended for the support to be “sufficient to achieve the purposes of this section.”¹⁵ However, Congress did not anticipate how significantly and rapidly implicit subsidies, including access charges, would begin to evaporate. As of 2000, access charges had been reduced by \$6.4 billion.¹⁶ The FCC did at that time acknowledge the problem, stating that the “new competitive environment envisioned by the 1996 Act, however, threatens to undermine this implicit support structure over the long run.”¹⁷ While the FCC has made it easier for ILECs to seek relief from the federal COLR, that does not impact state COLR requirements. In addition to COLR at the FCC, which addresses similar obligations regarding new customers, the FCC also has a process for discontinuing telephone service to existing customers, making state requirements largely redundant.

¹⁵ 47 U.S.C. § 254(e).

¹⁶ https://transition.fcc.gov/Bureaus/Common_Carrier/News_Releases/2000/nrcc0029.html.

¹⁷ In re Access Charge Reform, Price Cap Performance Review for Local Exchange Carriers, Low Volume Long Distance Users, and Federal-State Joint Board on Universal Service, Sixth Report and Order in CC Docket No. 96-26 and 94-1, Report and Order in CC Docket No. 99-249, and Eleventh Report and Order in CC Docket 96-45, FCC 00-193, 15 FCC Rcd 12962, at ¶ 24 (2000).

II. THE COMMISSION IS AUTHORIZED TO GRANT CENTURYLINK'S PETITION FOR EXEMPTION BECAUSE THE MARKETS IT SERVES IN UTAH ARE SUBJECT TO EFFECTIVE COMPETITION AND THE EXEMPTION IS IN THE PUBLIC INTEREST

The Commission is authorized to exempt CenturyLink from any requirement in the statutes that govern its authority. Section 54-8b-3(1)(a) states:

The commission, on its own initiative or in response to an application by a telecommunications corporation, a public agency, or a user of a public telecommunications service, may, after public notice and a hearing, issue an order exempting any telecommunications corporation or public telecommunications service from any requirement of this title...

The Commission's authority to exempt a telecommunications corporation or service includes the carrier of last resort obligation found in 54-8b-15(1)(b):

"Carrier of last resort" means:

- (i) an incumbent telephone corporation; or
- (ii) a telecommunications corporation that, under Section 54-8b-2.1: (A) has a certificate of public convenience and necessity to provide local exchange service; and (B) has an obligation to provide public telecommunications service to any customer class of customers that requests service within the local exchange.

Utah Code § 54-8b-3 further sets out two criteria for the Commission to grant an exemption.

The Commission must first find that "the telecommunications corporation or service is subject to effective competition" and that "the exemption is in the public interest."¹⁸

CenturyLink is subject to effective competition throughout its service territory. There is only one wire center where CenturyLink serves more than 20% of customers. It serves between 10 and 20 percent of customers in seven wire centers and, serves between only 1.32 and 9.44 percent of customers in the remaining 53 wire centers.¹⁹ Customers are choosing other alternatives,

¹⁸ Utah Code § 54-8b-3(4)(a) and (b).

¹⁹ See Highly Confidential Exhibit 4, Utah Household Percentage by Wire Center. The information contained in Exhibit 4 is proprietary, competitively sensitive data that could be used by competitors to harm CenturyLink. Confidential Exhibit 4 provides an estimate of the residential households in Utah served by CenturyLink (market share of the telecommunications corporation for which an exemption is proposed) in its service area by wire center. The number of

including VoIP (usually over coaxial cable), cellular wireless, satellite, and fixed wireless – there are an abundance of choices covering the vast majority of CenturyLink’s service territory in the state of Utah.²⁰ In sum, effective competition exists across CenturyLink’s wire centers for both existing and new customers.

Second, the Commission must find that the Petition is in the public interest. Granting the Petition provides an equal and balanced marketplace by relieving unfunded obligations to which competitors are not subject. Without the exemption, CenturyLink is at a substantial competitive disadvantage. Moreover, it is hampered in its ability to continue to deploy broadband and other advanced services throughout its markets negatively impacting consumers. It is not possible to both maintain a statewide network for traditional voice service and make the significant investments necessary to deploy new, enhanced networks capable of providing high speed access to the internet.

CenturyLink access lines as reported to the FCC on Form 477 for each wire center as of June 2022 was used as the numerator. CenturyLink used the estimated number of households, provided by Experian, for each wire center as the denominator to estimate the percentage of CenturyLink served residential households in each wire center. Experian collects and aggregates demographic data, e.g., the number of households for a given area in addition to its consumer credit reporting operations. The residential access lines reported to the FCC on Form 477 for each wire center is divided by the estimated residential households provided by Experian for each wire center to estimate the percentage of CenturyLink served households in each wire center.

²⁰ See Exhibit 5, CenturyLink Utah Wire Center by County, see also Exhibit 1, Technology Preferences. Exhibit 5 is developed using data from the FCC National Broadband Map released in November 2022. The FCC states: The National Broadband Map provides information about the internet services available to individual locations across the country, along with new maps of mobile coverage, as reported by Internet Service Providers (ISPs) in the FCC’s ongoing Broadband Data Collection. The previous reporting tool used census block level reporting rather than location specific reporting used in the National Broadband Map, which makes the National Broadband Map more accurate. In Exhibit 5, the data is captured on an area summary basis by Utah county, and the corresponding CenturyLink wire centers in each county are identified. There are five columns on Exhibit 5 with each column representing the percentage of coverage in a county by selected technology types: (1) percent of coverage for all wired and fixed wireless (licensed) to include copper, fiber, and cable and licensed fixed wireless; (2) percent of coverage for all wired to include includes copper, fiber, and cable but excluding licensed fixed wireless; (3) percent of coverage for cable and fiber to include cable and fiber only and excluding copper; (4) percent of coverage for wireless (licensed) to include license fixed wireless providers only; and (5) percent of coverage for mobile to include mobile wireless providers only. Satellite and Unlicensed Fixed Wireless providers are excluded from Exhibit 5. The numbers at the bottom of the column headers (25/3 or 5/1) reflect the broadband speed that is reflected in the percentages. The attached maps in Exhibit 5 reflect the percent of coverage cable/fiber column by wire center. The National Broadband Map also allows searches by address and provides a list of available broadband providers and broadband speeds by provider for that specific address. Exhibit 5 utilizes summary data by county. Note that Exhibit 5 does not account for satellite coverage, such as Starlink. Had satellite service been included, there would be coverage in 100% of wire centers.

Granting the petition is therefore in the public interest.

A CENTURYLINK MARKET SHARE, DATA ON CELL PHONE SUBSTITUTION, COMPETITOR COVERAGE MAPS, AND RDOF COVERAGE DEMONSTRATE THAT CENTURYLINK IS SUBJECT TO EFFECTIVE COMPETITION THROUGHOUT ITS UTAH SERVICE TERRITORY

For the Commission to grant this Petition, it must find that CenturyLink is subject to “effective competition.”²¹ The law sets out a list of criteria for the Commission to consider in making its determination:

In determining if the telecommunications corporation or service is subject to effective competition, the commission shall consider all relevant factors, which **may** include:

- (a) the extent to which competing telecommunications services are available from alternative telecommunications providers;
- (b) the ability of alternative telecommunications providers to offer competing telecommunications services that are functionally equivalent or substitutable and reasonably available at comparable prices, terms, quality, and conditions;
- (c) the market share of the telecommunications corporation for which an exemption is proposed;
- (d) the extent of economic or regulatory barriers to entry;
- (e) the impact of potential competition; and
- (f) the type and degree of exemptions to this title that are proposed.²² (emphasis added)

First and foremost, CenturyLink’s market share has shrunk in all of its Utah wire centers. With 90% or greater market loss in most wire centers, and 75% or greater loss in every wire center, competition is intuitively effective. The requirement that CenturyLink connect to every new customer location even if the Company does not serve them significantly reduces margins and leaves a smaller capital spending budget spread out over greater geographic areas. With such a small market share the company faces a significant loss in return on investment leading to long payback periods that may never fully recoup costs. That diminished market share alone

²¹ See Exhibit 5, CenturyLink Utah Wire Center by County; *see also* Exhibit 1, Utah Households with Voice Service by Technology.

²² 54-8b-3(5).

shows that competition is both effective and thriving, and alternatives are readily available in every wire center in the Company's service territory.

B GRANTING THE EXEMPTION IS IN THE PUBLIC INTEREST BECAUSE NONE OF CENTURYLINK'S CURRENT CUSTOMERS ARE IMPACTED AND THE COLR DIMINISHES THE COMPANY'S ABILITY TO INVEST IN THE SERVICES THAT CUSTOMERS DEMAND

The Commission must also find that granting the exemption is in the public interest. The legislature provided specific criteria for the Commission to consider in determining whether an exemption is in the public interest: "In determining if the proposed exemption is in the public interest, the commission shall consider, in addition to other relevant factors, the impact the proposed exemption would have on captive customers of the telecommunications corporation."²³ Since CenturyLink is not seeking relief from discontinuance obligations, the idea of captive customer does not apply to COLR relief. This is because any customers that would be considered "captive" will continue to receive telephone services and accordingly their location's specific competitive status is not relevant to COLR relief. To the extent that a new, non-existing, non-captive, customer might request service in an area currently covered by CenturyLink's COLR obligations, that new customer would still have the option to elect to take service from CenturyLink using line extension process or opt for a competitor's service from wireline, wireless, fixed wireless, and satellite providers.

There are other factors that support a finding that the exemption is in the public interest. An incredible amount of public funding has gone into broadband and away from traditional voice service over the past decade. The CAF and CAF II programs have already funded the expansion of competitive broadband and voice services to many of the areas in CenturyLink's

²³ § 54-8b-3(6).

service territory, resulting in new ETCs being designated for those areas across the state.

Additionally, the Utah Broadband Office will soon release its five-year action plan for BEAD funding for areas with broadband needs that are unserved and underserved. Further investment in POTS is contrary to both the market and government investment trends.

III. THE LEGISLATURE HAS DECLARED THAT IT IS THE POLICY OF THE STATE OF UTAH TO ALLOW FLEXIBLE AND REDUCED REGULATION AND TO FACILITATE THE DEPLOYMENT OF ADVANCED SERVICES

Granting this Petition advances the policies that the legislature established to ensure regulation reflects modern markets, including to:

- (3) encourage the development of competition as a means of providing wider customer choices for public telecommunications services throughout the state;
- (4) allow flexible and reduced regulation for telecommunications corporations and public telecommunications services as competition develops;
- (5) facilitate and promote the efficient development and deployment of an advanced telecommunications infrastructure, including networks with nondiscriminatory prices, terms, and conditions of interconnection.²⁴

This exemption will result in reduced and more flexible regulation, which will allow the Company to invest based on market principles rather than regulatory principles that were developed under monopoly market conditions and have not been updated since the nineties.

IV. CONCLUSION

The law authorizes the Commission to exempt CenturyLink of COLR obligations, and the Petition satisfies the criteria set out in the law that guides the Commission in granting the exemption. The Petition satisfies the necessary criteria for an exemption from COLR. Competing telecommunications services are widely available from alternative telecommunications providers. As a result, CenturyLink has lost a substantial number of

²⁴ Utah Code § 54-8b-1.1.

customers, leaving the Company with minority share in the market for which an exemption is proposed. Full exemption is warranted given the state of competition, wide availability of alternatives to customers, and the lack of state or federal support.

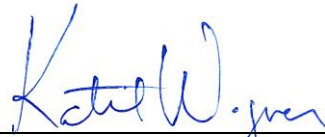
V. REQUEST FOR RELIEF

CenturyLink respectfully requests that the Commission exempt it in whole, or in the alternative in part, from the carrier of last resort obligation, defined in 54-8b-15(1)(b), for all the wire centers in its Utah service territory.

Respectfully submitted this 20th day of June, 2023.

CENTURYLINK

By: _____



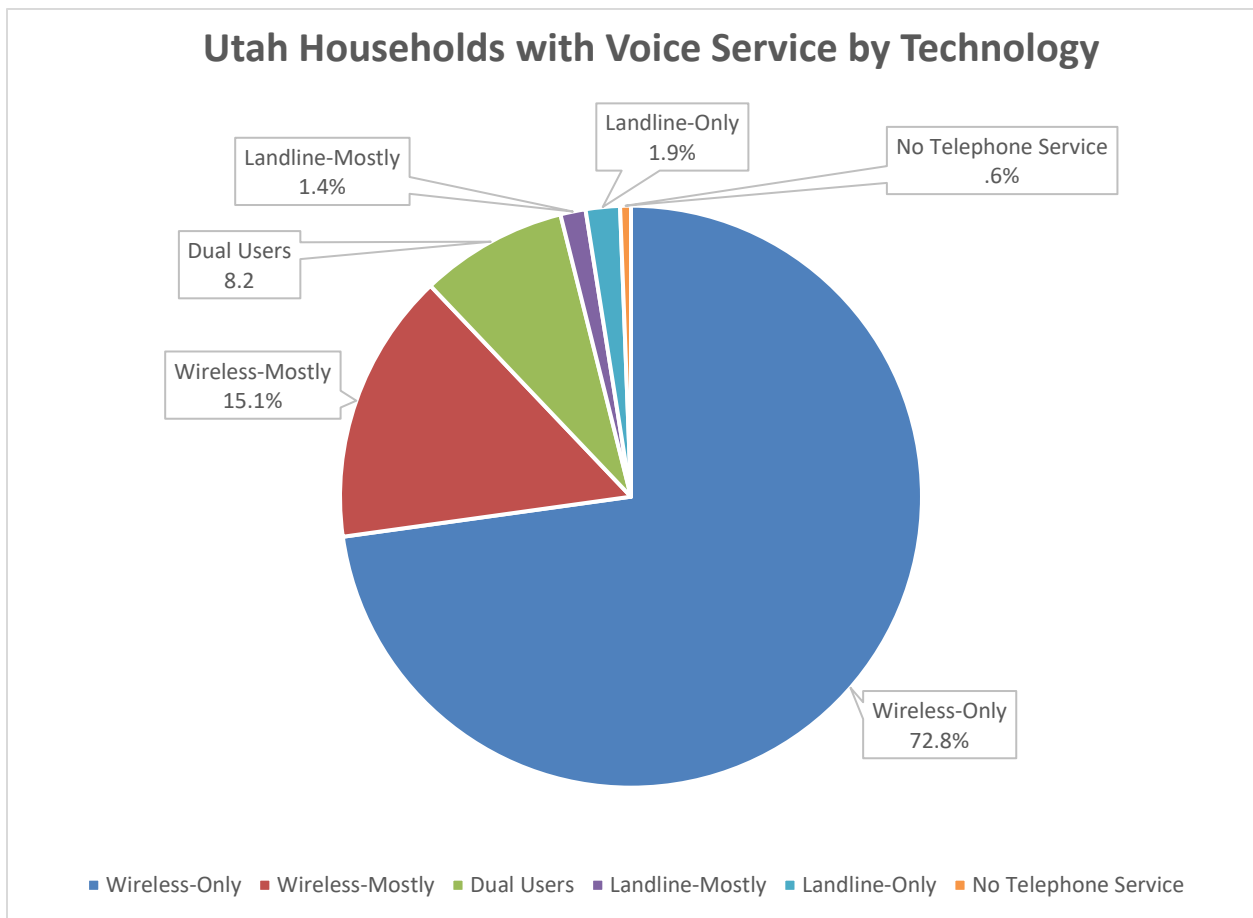
Katie N. Wagner, OK Bar #33296

Senior Corporate Counsel

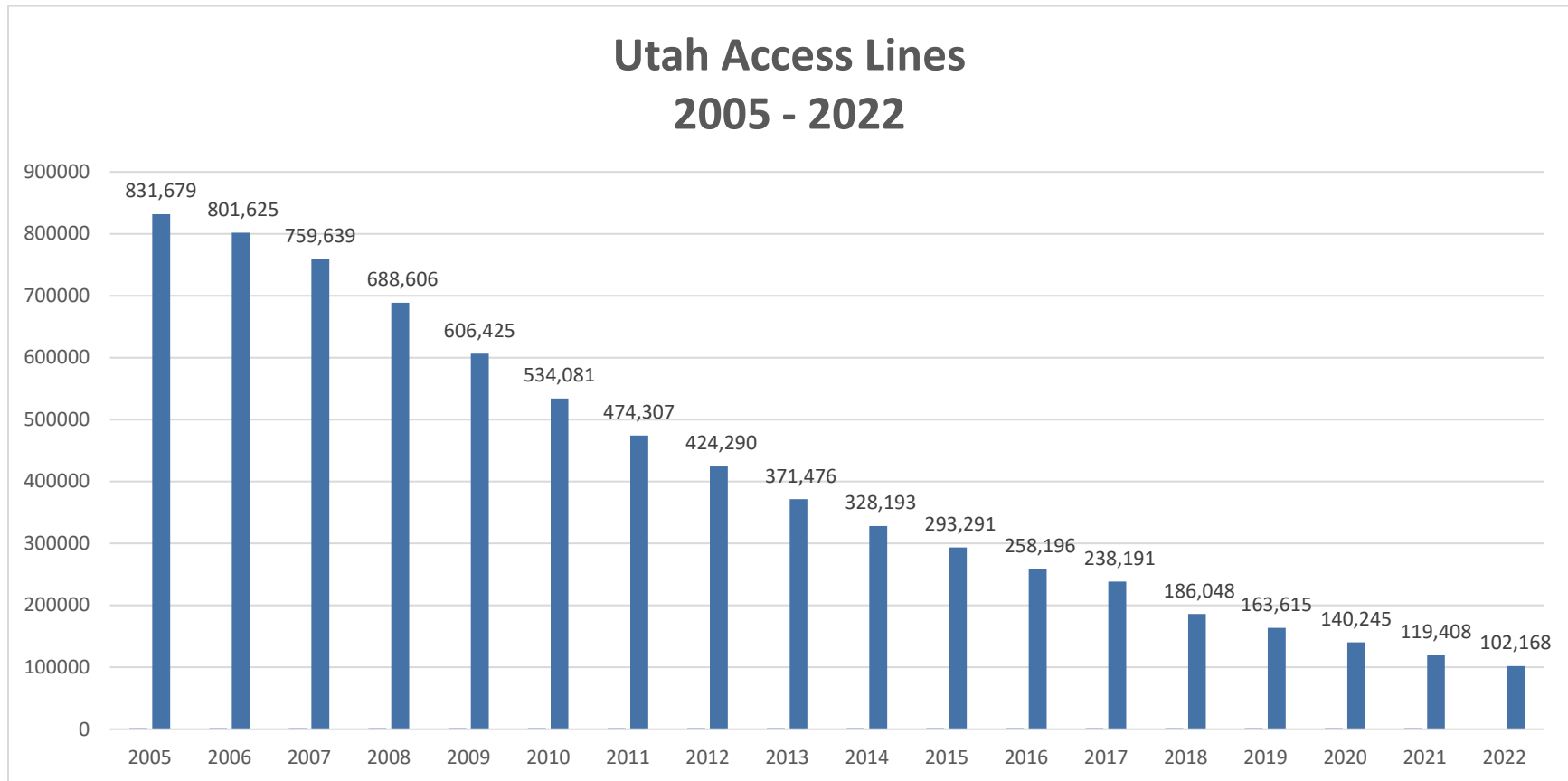
Katie.wagner@lumen.com

405-669-8712

22-049-62 Qwest COLR Petition Exhibit 1 Utah Households by Technology Preference (2020)

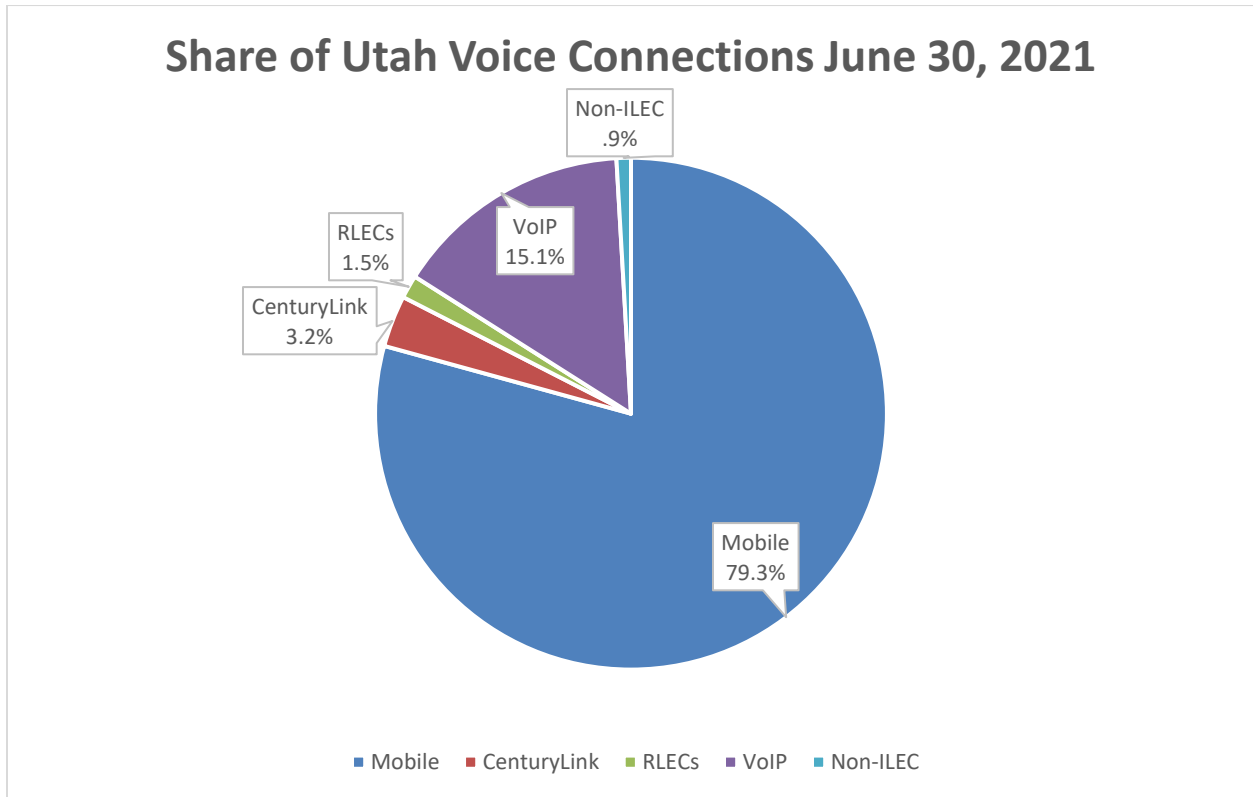


Source: Centers for Disease Control and Prevention, National Center for Health Statistics, National Health Interview Survey Early Release Program
https://www.cdc.gov/nchs/data/nhis/earlyrelease/Wireless_state_202212.pdf



FCC Form 477 Fixed Voice Subscriptions

22-049-62 Qwest COLR Petition Exhibit 3 Share of Utah Voice Connections (2021)



Source: FCC Voice Subscriptions June 30, 2021

CenturyLink Utah Wire Center By County

CLLI	WIRE CENTER	COUNTY	% COVERAGE ALL WIRED, FIXED WIRELESS (LICENSED) (25/3)	% COVERAGE ALL WIRED (25/3)	% COVERAGE CABLE / FIBER (25/3)	% COVERAGE FIXED WIRELESS (LICENSED) (25/3)	% COVERAGE MOBILE (5/1)
ALTAUTMA	Alta	Salt Lake	99.13%	98.50%	97.80%	75.74%	98.89%
AMFKUTMA	American Fork	Utah	97.92%	94.75%	94.13%	78.24%	86.57%
BEVRUTMA	Beaver	Beaver	92.04%	65.08%	56.68%	91.65%	66.66%
BGCYUTMA	Brigham City	Box Elder	84.85%	82.19%	80.86%	51.53%	64.02%
BNHDUTMA	Brianhead	Iron	95.00%	84.44%	82.97%	90.65%	81.41%
BNTFUTMA	Bountiful	Davis	99.83%	99.24%	99.01%	86.84%	93.58%
CDCYUTMA	Cedar City	Iron	95.00%	84.44%	82.97%	90.65%	81.41%
CLFDUTMA	Clearfield	Davis	99.83%	99.24%	99.01%	86.84%	93.58%
CRNNUTMA	Corinne	Box Elder	84.85%	82.19%	80.86%	51.53%	64.02%
CTWDUTMA	Cottonwood	Salt Lake	99.13%	98.50%	97.80%	75.74%	98.89%
DRPRUTMA	Draper	Salt Lake	99.13%	98.50%	97.80%	75.74%	98.89%
FRTNUTMA	Farmington	Davis	99.83%	99.24%	99.01%	86.84%	93.58%
GTVLUTMA	Grantsville	Tooele	95.44%	92.19%	89.76%	56.00%	80.17%
HBCYUTMA	Heber City	Wasatch	84.03%	79.00%	74.61%	48.47%	71.58%
HLDYUTMA	Holladay	Salt Lake	99.13%	98.50%	97.80%	75.74%	98.89%
HNVIUTMA	Huntsville	Weber	95.93%	93.94%	93.03%	49.96%	73.99%
HRCNUTMA	Hurricane	Washington	98.46%	94.18%	93.89%	96.54%	93.34%
HYRMUTMA	Hyrum	Cache	93.57%	90.04%	89.81%	64.90%	69.35%
KRNSUTMA	Kearns	Salt Lake	99.13%	98.50%	97.80%	75.74%	98.89%
KYVLUTMA	Kaysville	Davis	99.83%	99.24%	99.01%	86.84%	93.58%
LEDSUTMA	Leeds	Washington	98.46%	94.18%	93.89%	96.54%	93.34%
LEHIUTMA	Lehi	Utah	97.92%	94.75%	94.13%	78.24%	86.57%
LOGNUTMA	Logan	Cache	93.57%	90.04%	89.81%	64.90%	69.35%
LYTNUTMA	Layton East	Davis	99.83%	99.24%	99.01%	86.84%	93.58%
MAGNUTNM	Magna	Salt Lake	99.13%	98.50%	97.80%	75.74%	98.89%
MDVAUTMA	Midvale	Salt Lake	99.13%	98.50%	97.80%	75.74%	98.89%
MONRUTMA	Monroe	Sevier	95.09%	65.57%	62.94%	92.08%	74.15%
MRGBNUTMA	Morgan	Morgan	65.27%	55.85%	52.23%	15.85%	66.70%
MRRYUTMA	Murray	Salt Lake	99.13%	98.50%	97.80%	75.74%	98.89%
MTGNUTMA	Mountain Green	Morgan	65.27%	55.85%	52.23%	15.85%	66.70%
NEPHUTMA	Nephi	Juab	75.36%	63.83%	60.95%	30.49%	50.79%
OGDNUTMA	Ogden Main	Weber	95.93%	93.94%	93.03%	49.96%	73.99%
OGDNUTNO	Ogden North	Weber	95.93%	93.94%	93.03%	49.96%	73.99%
OGDNUTSO	Ogden South	Weber	95.93%	93.94%	93.03%	49.96%	73.99%

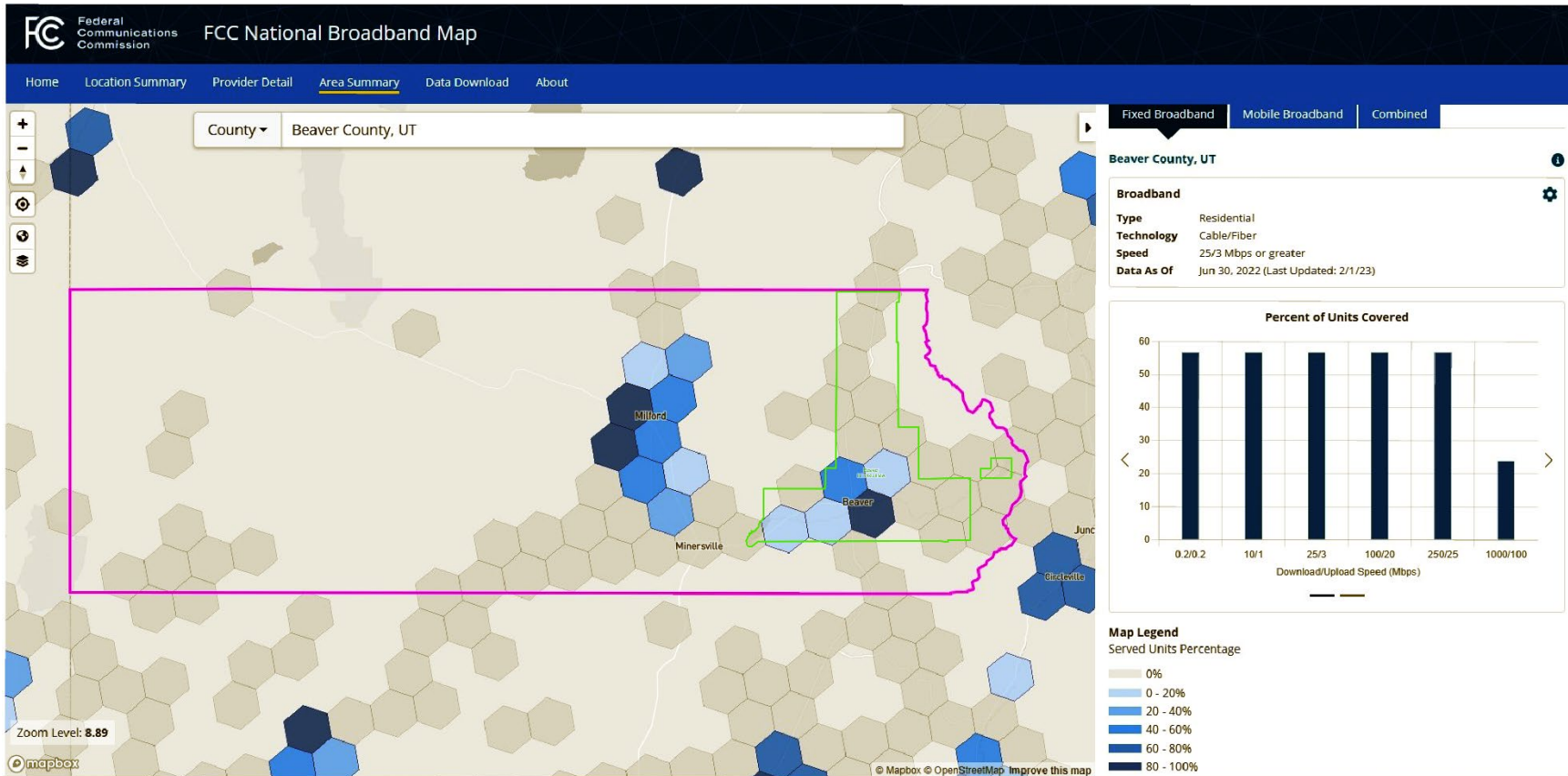
Source: FCC National Broadband Map

CenturyLink Utah Wire Center By County

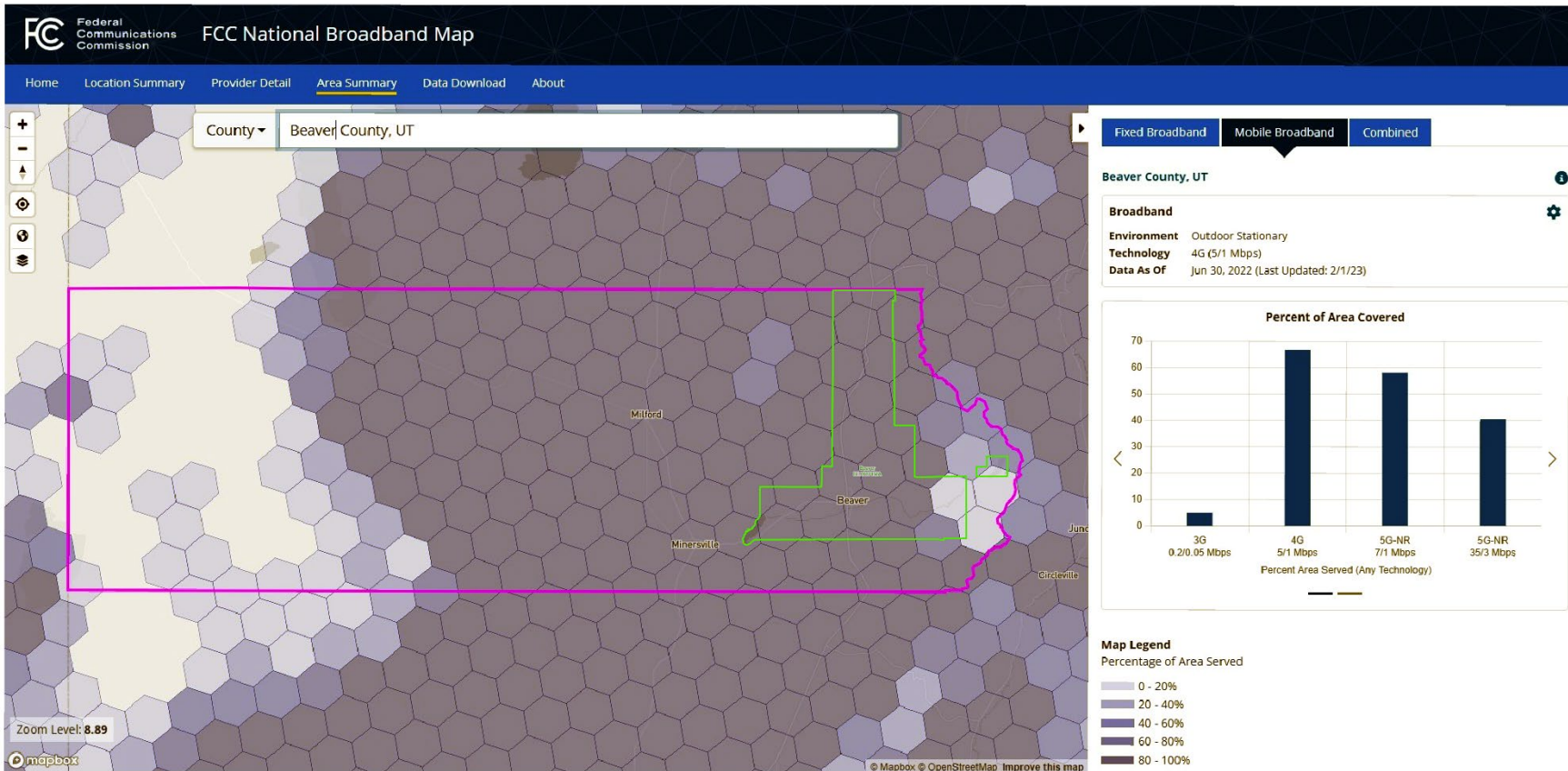
CLLI	WIRE CENTER	COUNTY	% COVERAGE ALL WIRED, FIXED WIRELESS (LICENSED) (25/3)	% COVERAGE ALL WIRED (25/3)	% COVERAGE CABLE / FIBER (25/3)	% COVERAGE FIXED WIRELESS (LICENSED) (25/3)	% COVERAGE MOBILE (5/1)
OGDNUTWE	Ogden West	Weber	95.93%	93.94%	93.03%	49.96%	73.99%
OREMUTMA	Orem	Utah	97.92%	94.75%	94.13%	78.24%	86.57%
PAGEAZMA	Page	Kane	74.38%	68.44%	45.52%	37.03%	64.69%
PLGVUTMA	Pleasant Grove	Utah	97.92%	94.75%	94.13%	78.24%	86.57%
PRCYUTMA	Park City	Summit	84.45%	80.90%	79.92%	23.57%	55.29%
PROVUTMA	Provo	Utah	97.92%	94.75%	94.13%	78.24%	86.57%
PRWNUTMA	Parowan	Iron	95.00%	84.44%	82.97%	90.65%	81.41%
PYSNUTMA	Payson	Utah	97.92%	94.75%	94.13%	78.24%	86.57%
RCFDUTMA	Richfield	Sevier	95.09%	65.57%	62.94%	92.08%	74.15%
RCMDUTMA	Richmond	Cache	93.57%	90.04%	89.81%	64.90%	69.35%
RVTNUTMA	Riverton	Salt Lake	99.13%	98.50%	97.80%	75.74%	98.89%
SALMUTMA	Salem	Utah	97.92%	94.75%	94.13%	78.24%	86.57%
SALNUTMA	Salina	Sevier	95.09%	65.57%	62.94%	92.08%	74.15%
SLKCUTEA	Salt Lake City East	Salt Lake	99.13%	98.50%	97.80%	75.74%	98.89%
SLKCUTMA	Salt Lake City Main	Salt Lake	99.13%	98.50%	97.80%	75.74%	98.89%
SLKCUTSO	Salt Lake City South	Salt Lake	99.13%	98.50%	97.80%	75.74%	98.89%
SLKCUTWE	Salt Lake City West	Salt Lake	99.13%	98.50%	97.80%	75.74%	98.89%
SMFDUTMA	Smithfield	Cache	93.57%	90.04%	89.81%	64.90%	69.35%
SNTQUTMA	Santaquin	Utah	97.92%	94.75%	94.13%	78.24%	86.57%
SPDLUTMA	Springdale	Washington	98.46%	94.18%	93.89%	96.54%	93.34%
SPFKUTMA	Spanish Fork	Utah	97.92%	94.75%	94.13%	78.24%	86.57%
SPVLUTMA	Springville	Utah	97.92%	94.75%	94.13%	78.24%	86.57%
STGRUTMA	St George	Washington	98.46%	94.18%	93.89%	96.54%	93.34%
TOOLUTMA	Tooele	Tooele	95.44%	92.19%	89.76%	56.00%	80.17%
VEYOUTMA	Veyo	Washington	98.46%	94.18%	93.89%	96.54%	93.34%
WASHUTMA	Washington	Washington	98.46%	94.18%	93.89%	96.54%	93.34%
WJRDUTMA	West Jordan	Salt Lake	99.13%	98.50%	97.80%	75.74%	98.89%

Source: FCC National Broadband Map

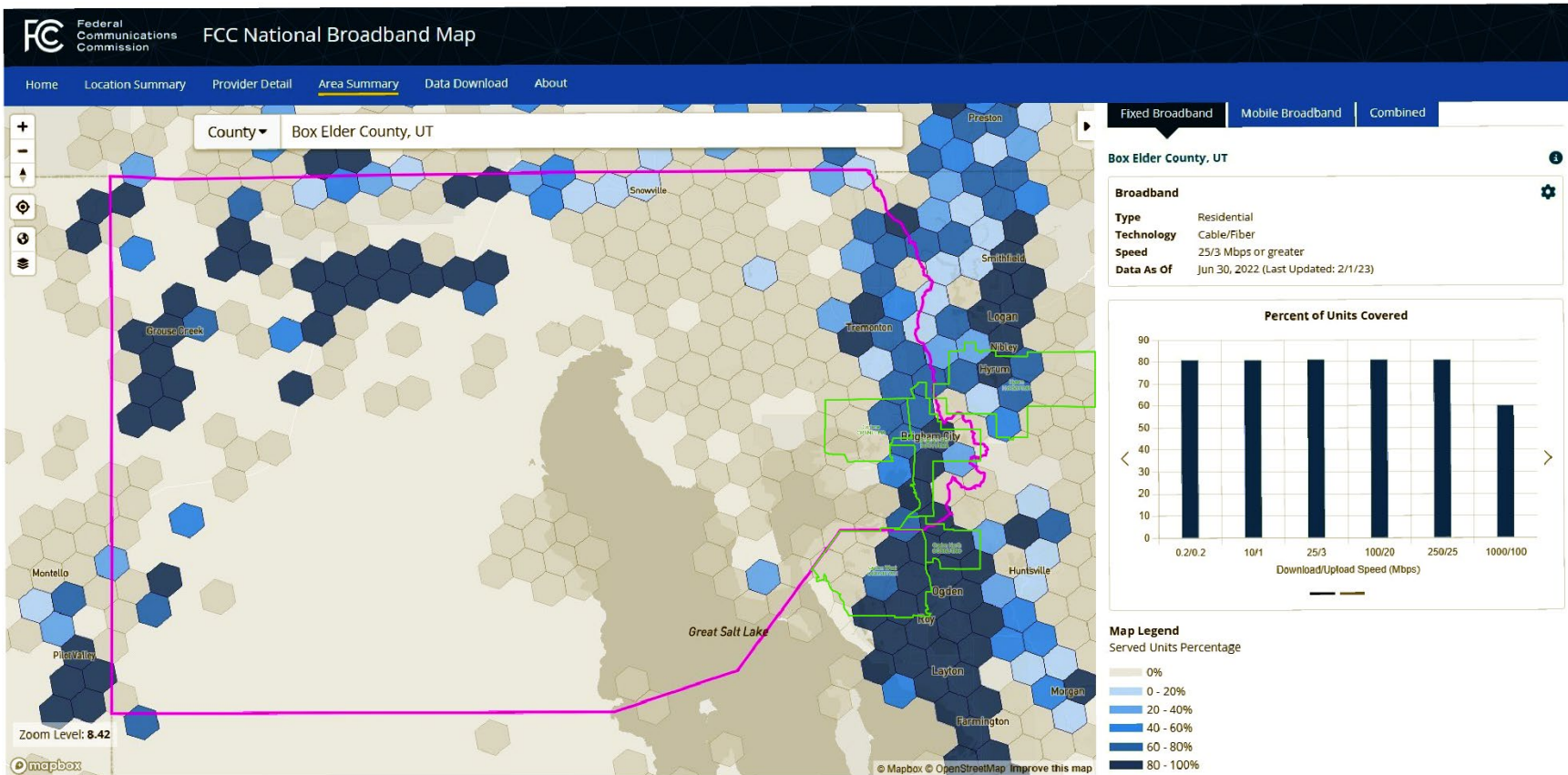
Beaver County Cable / Fiber



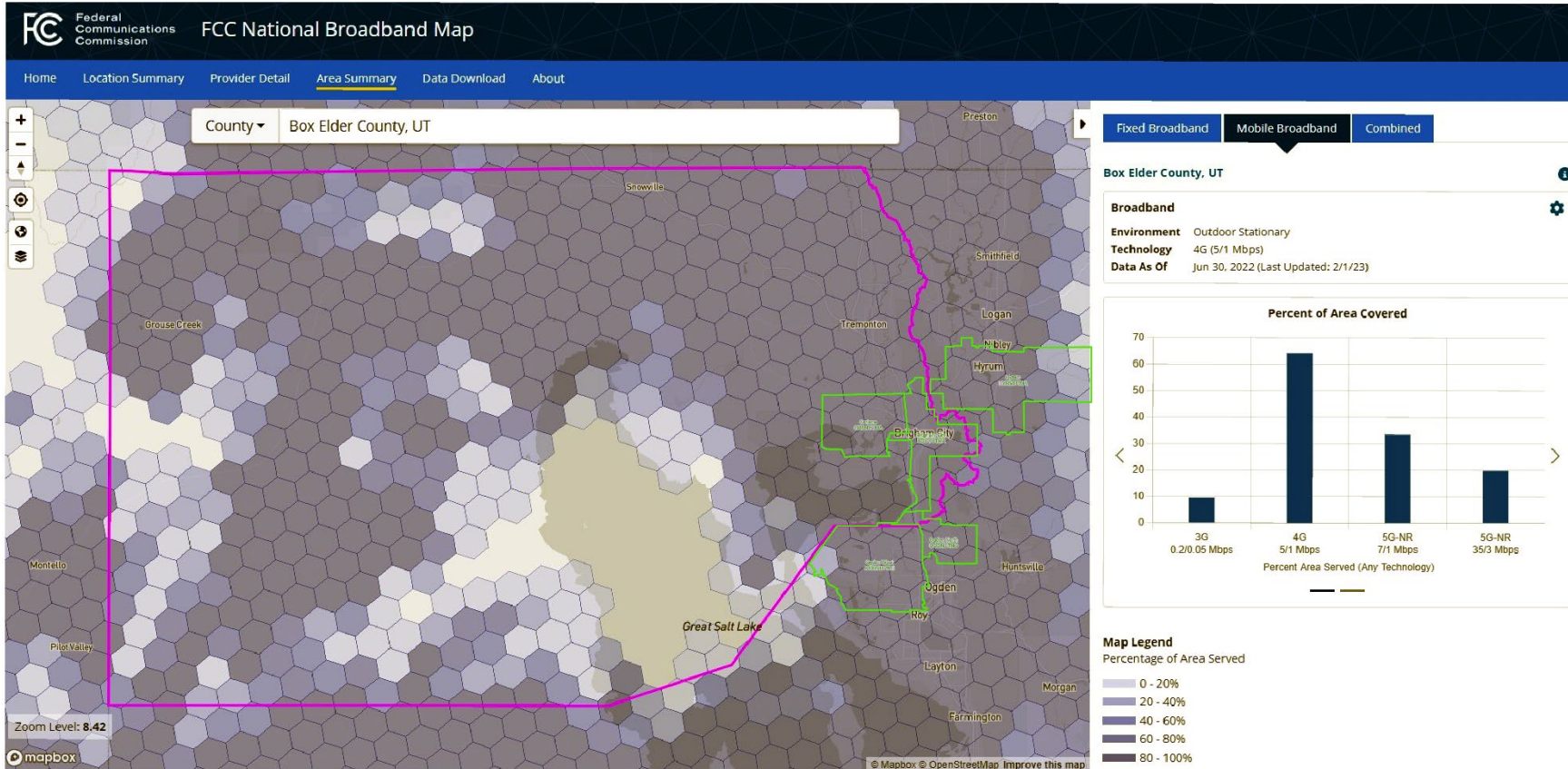
Beaver County Mobile



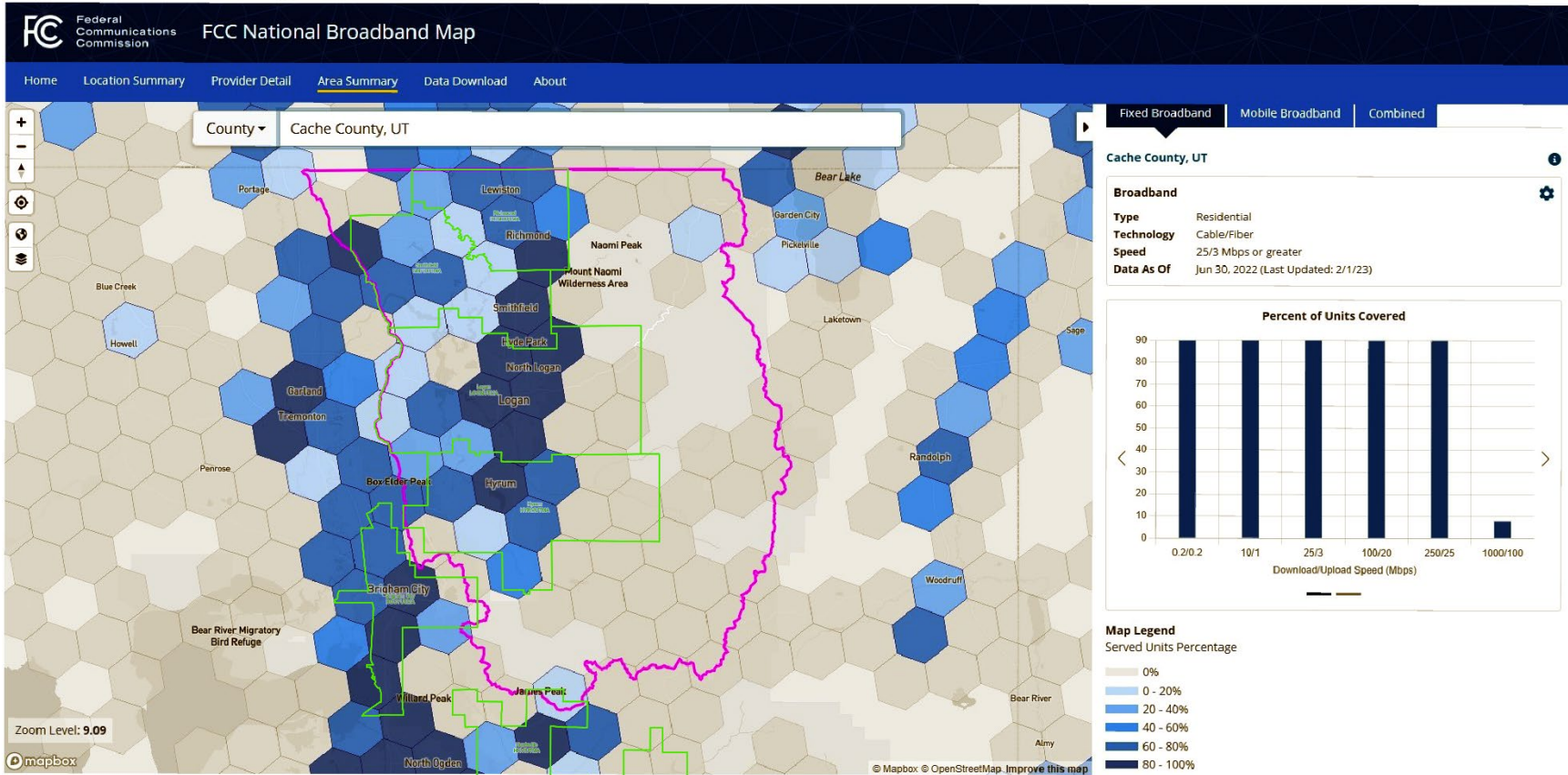
Box Elder County Cable / Fiber



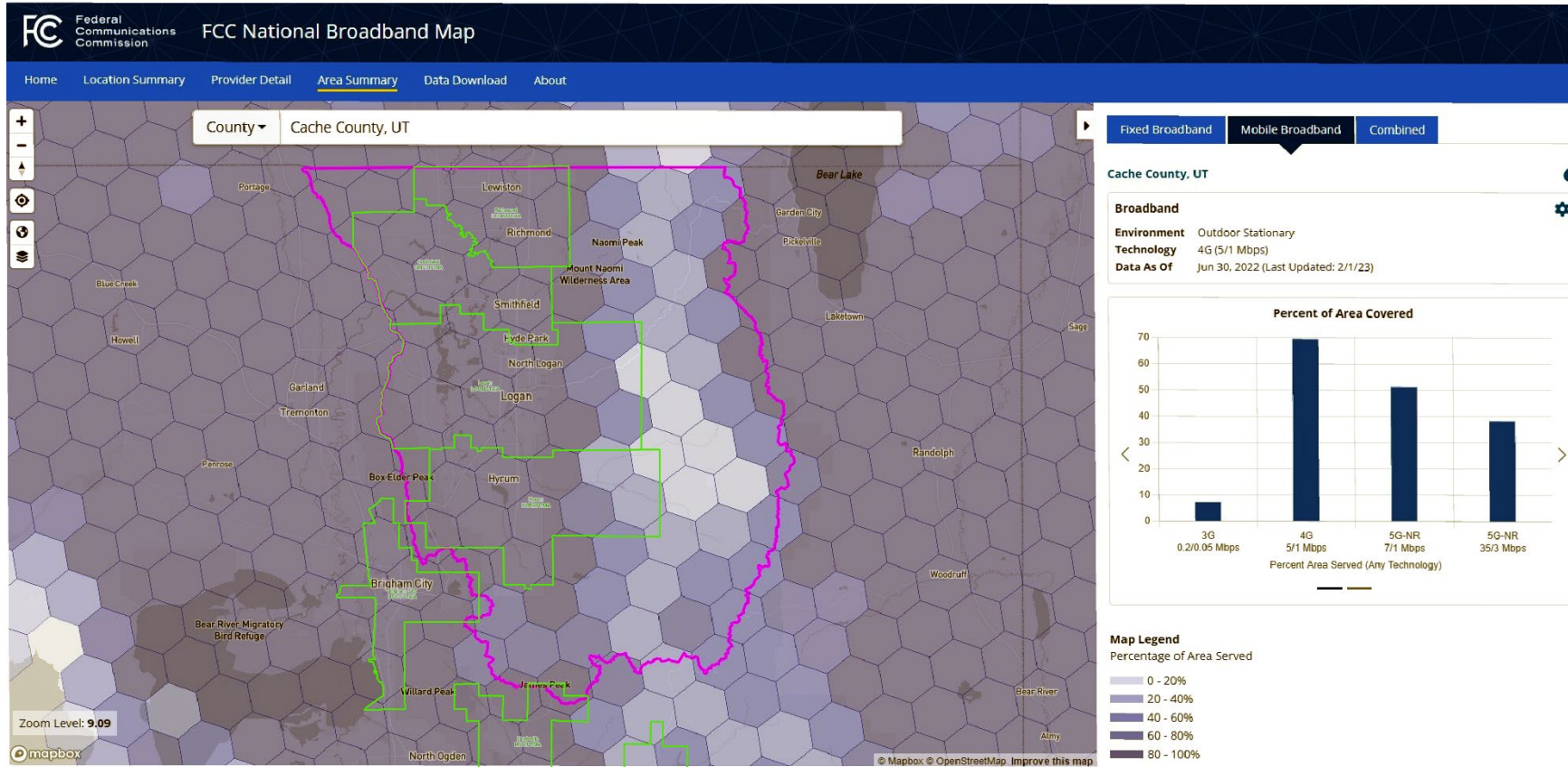
Box Elder County Mobile



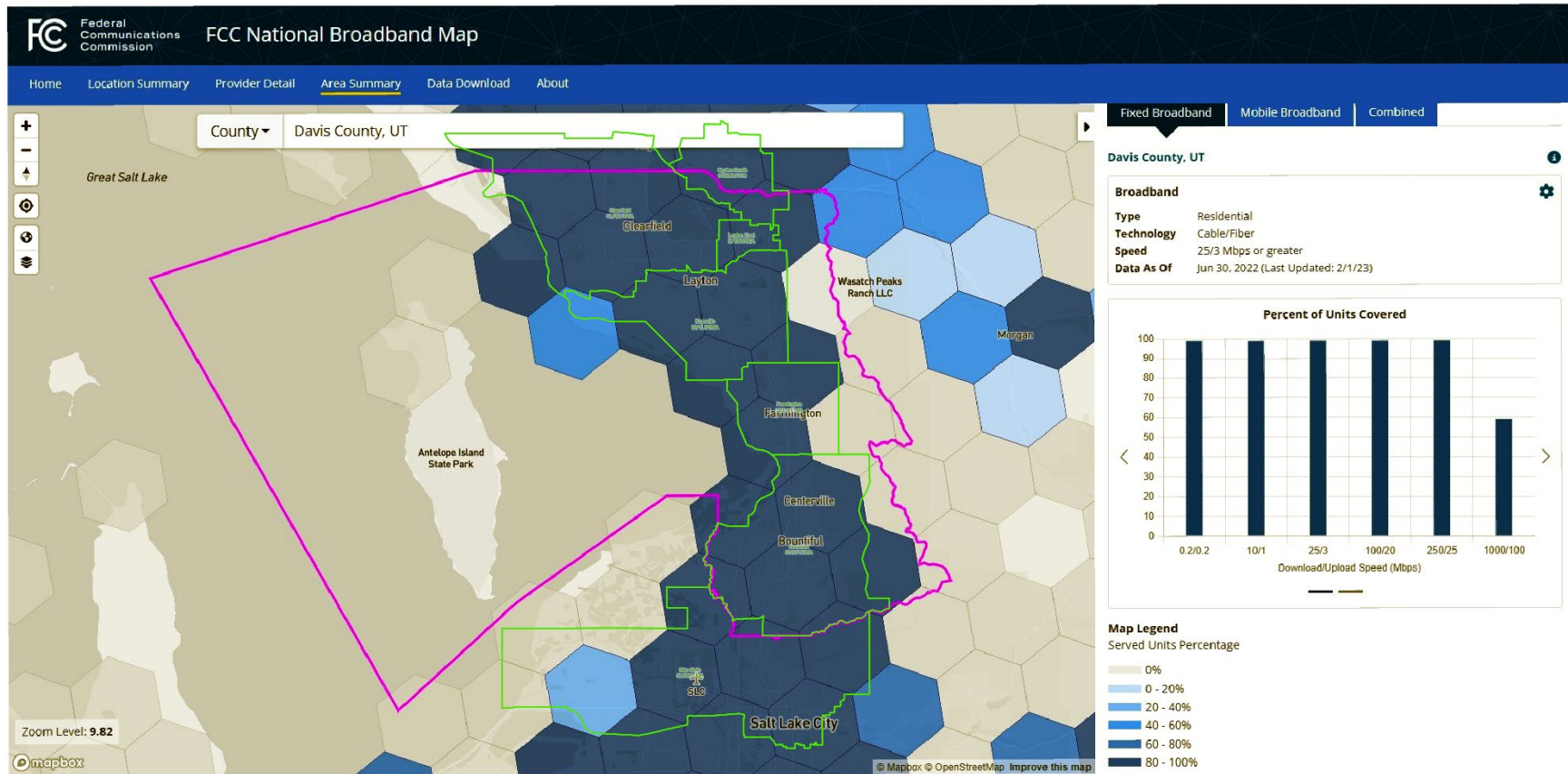
Cache County Cable / Fiber



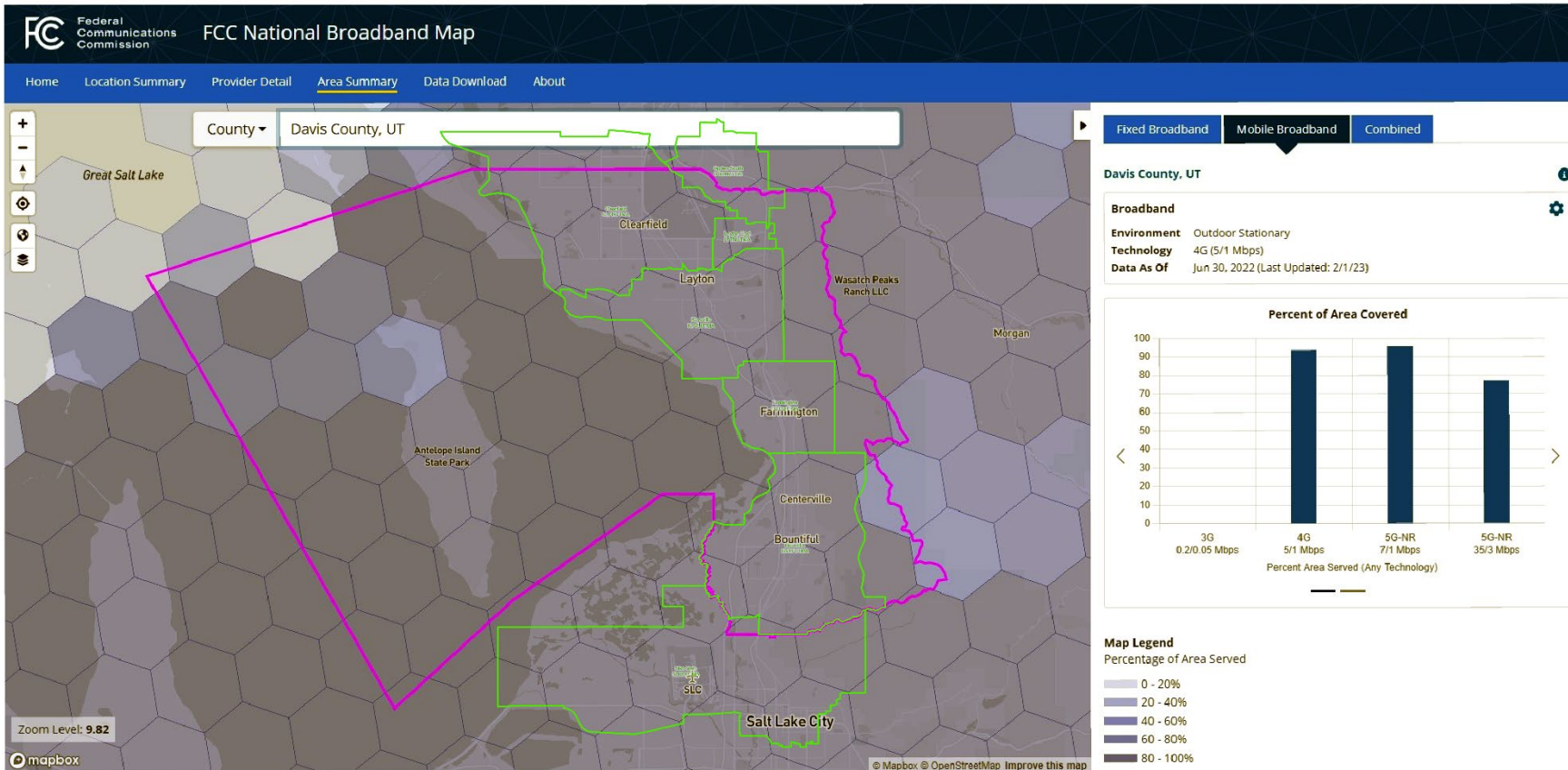
Cache County Mobile



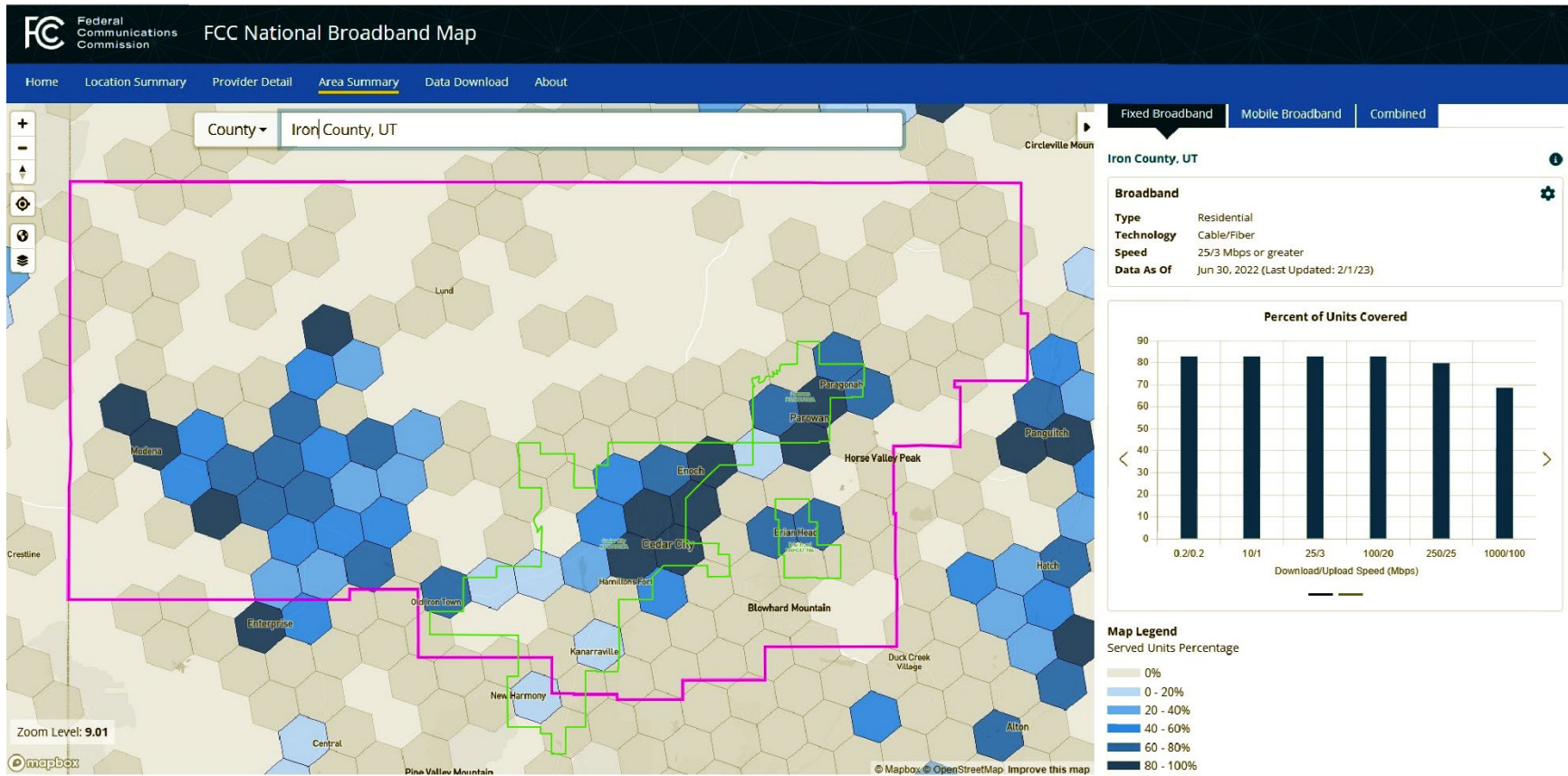
Davis County Cable / Fiber



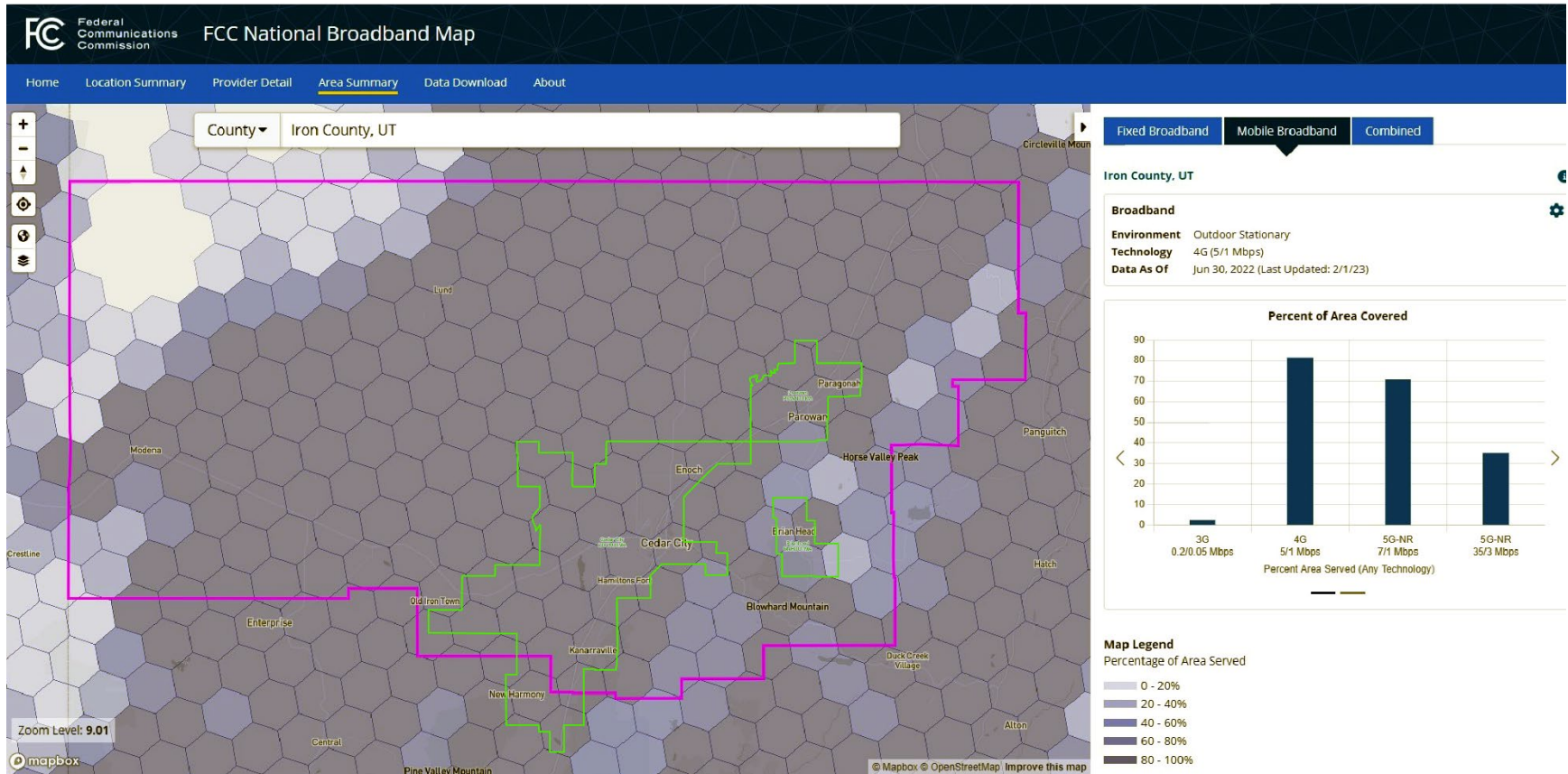
Davis County Mobile



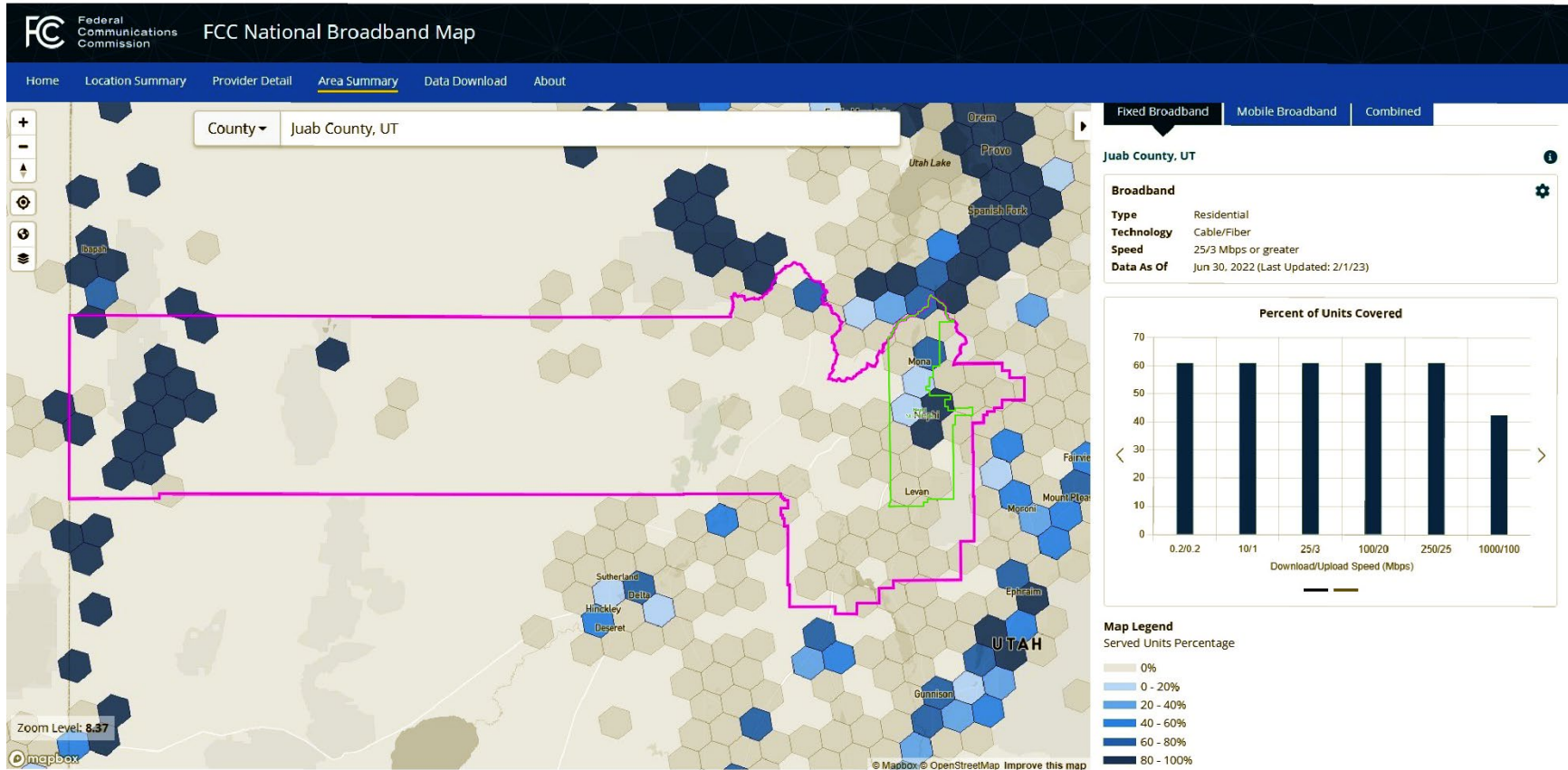
Iron County Cable / Fiber



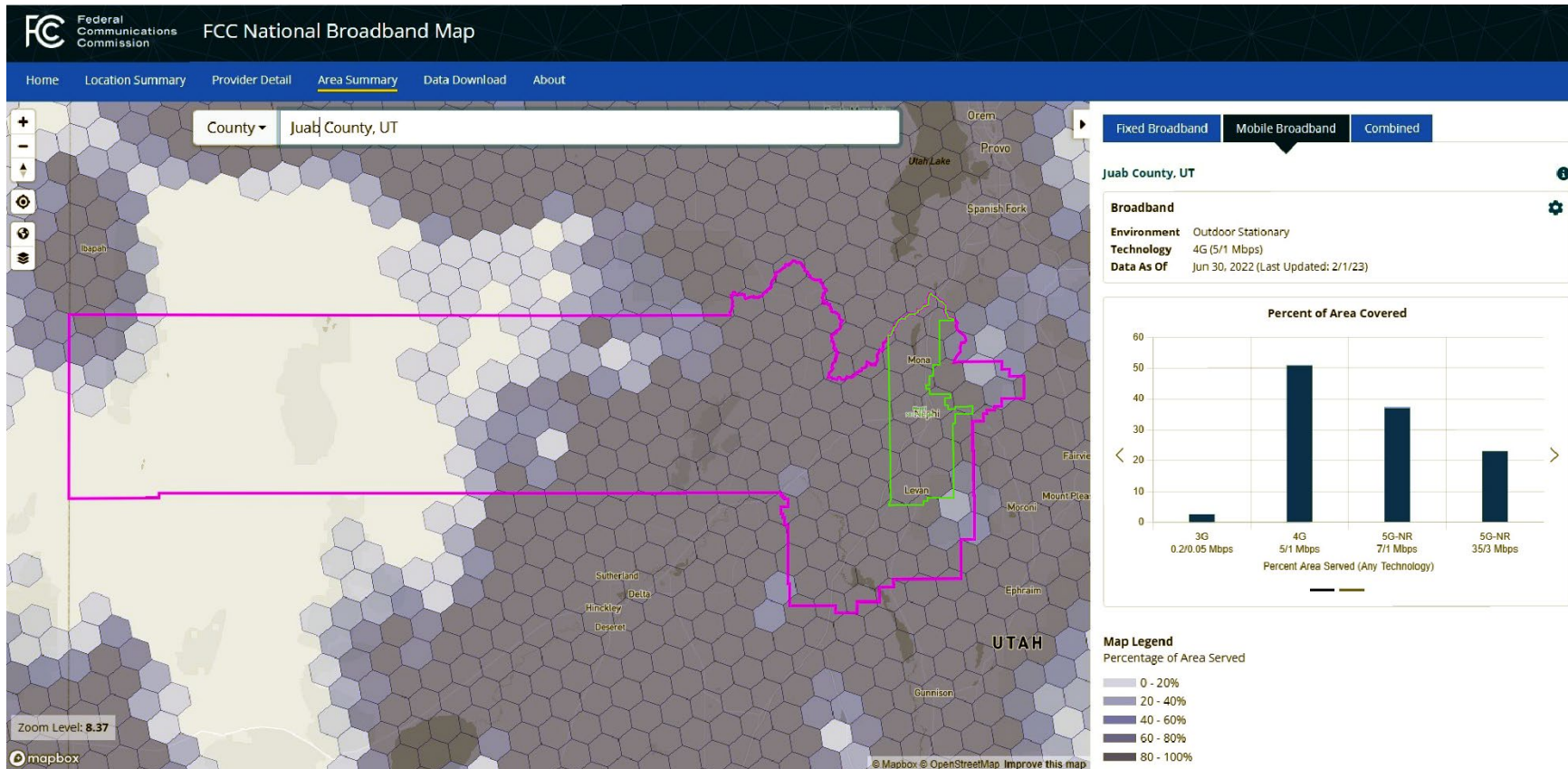
Iron County Mobile



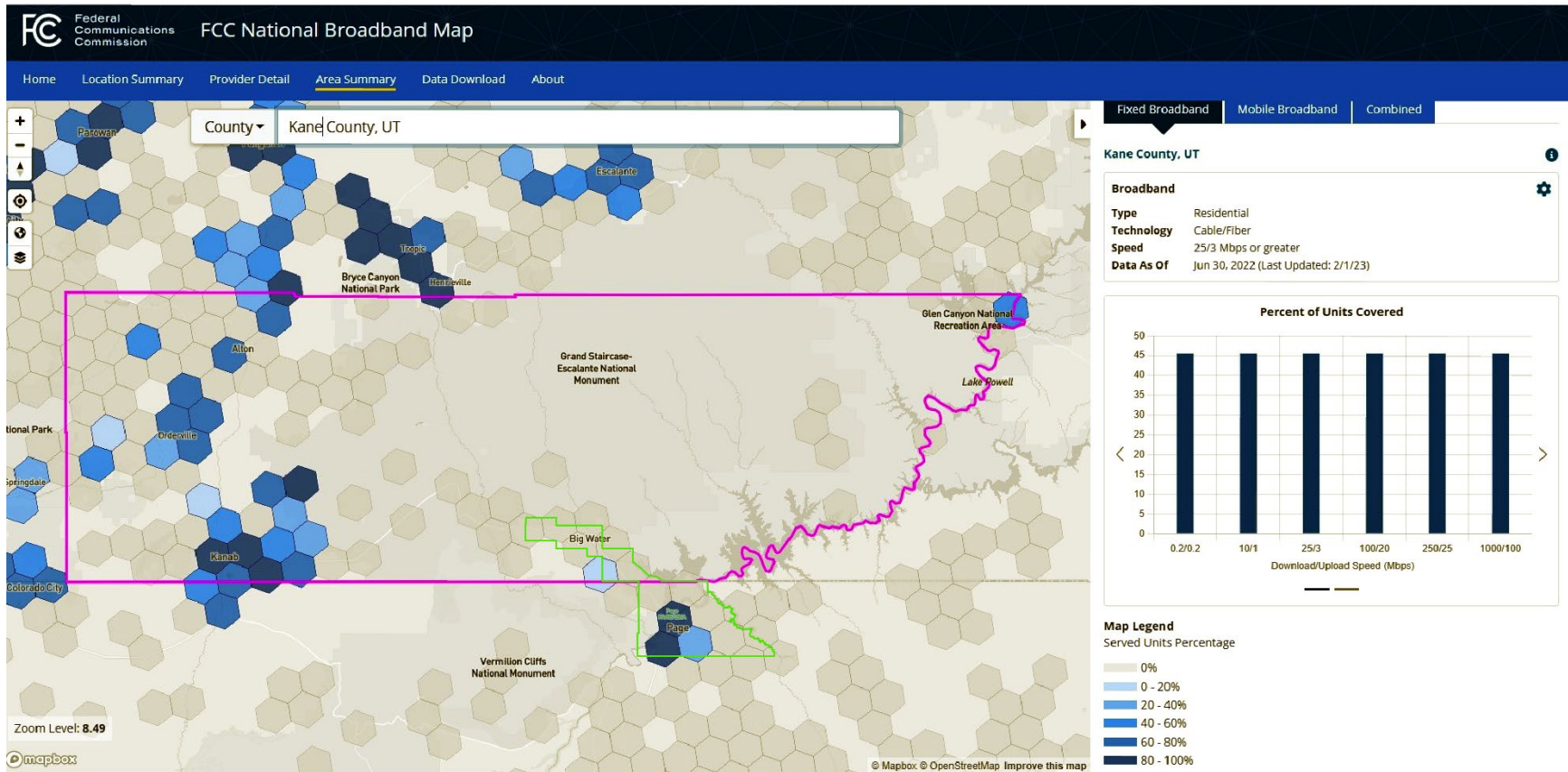
Juab County Cable / Fiber



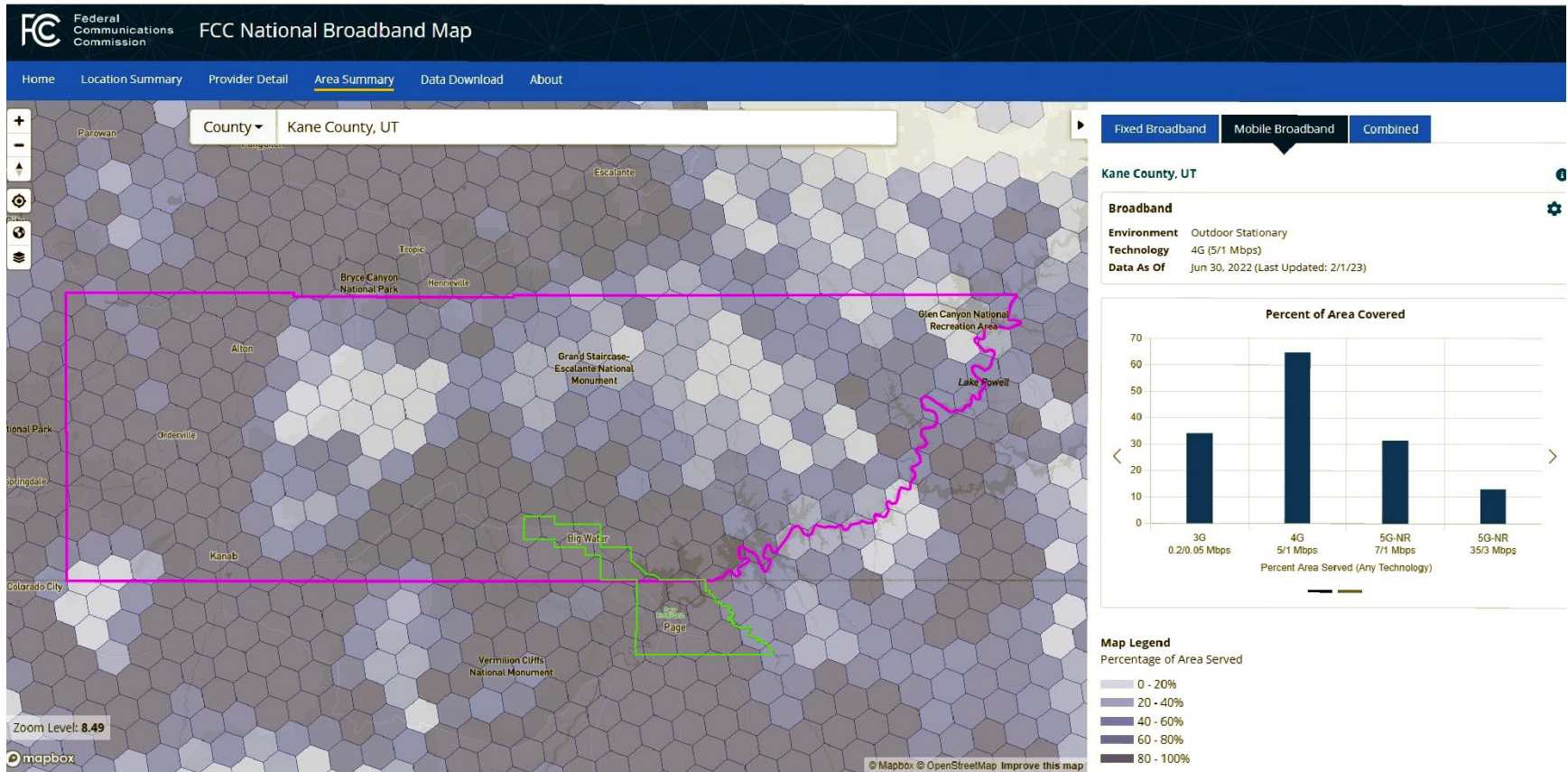
Juab County Mobile



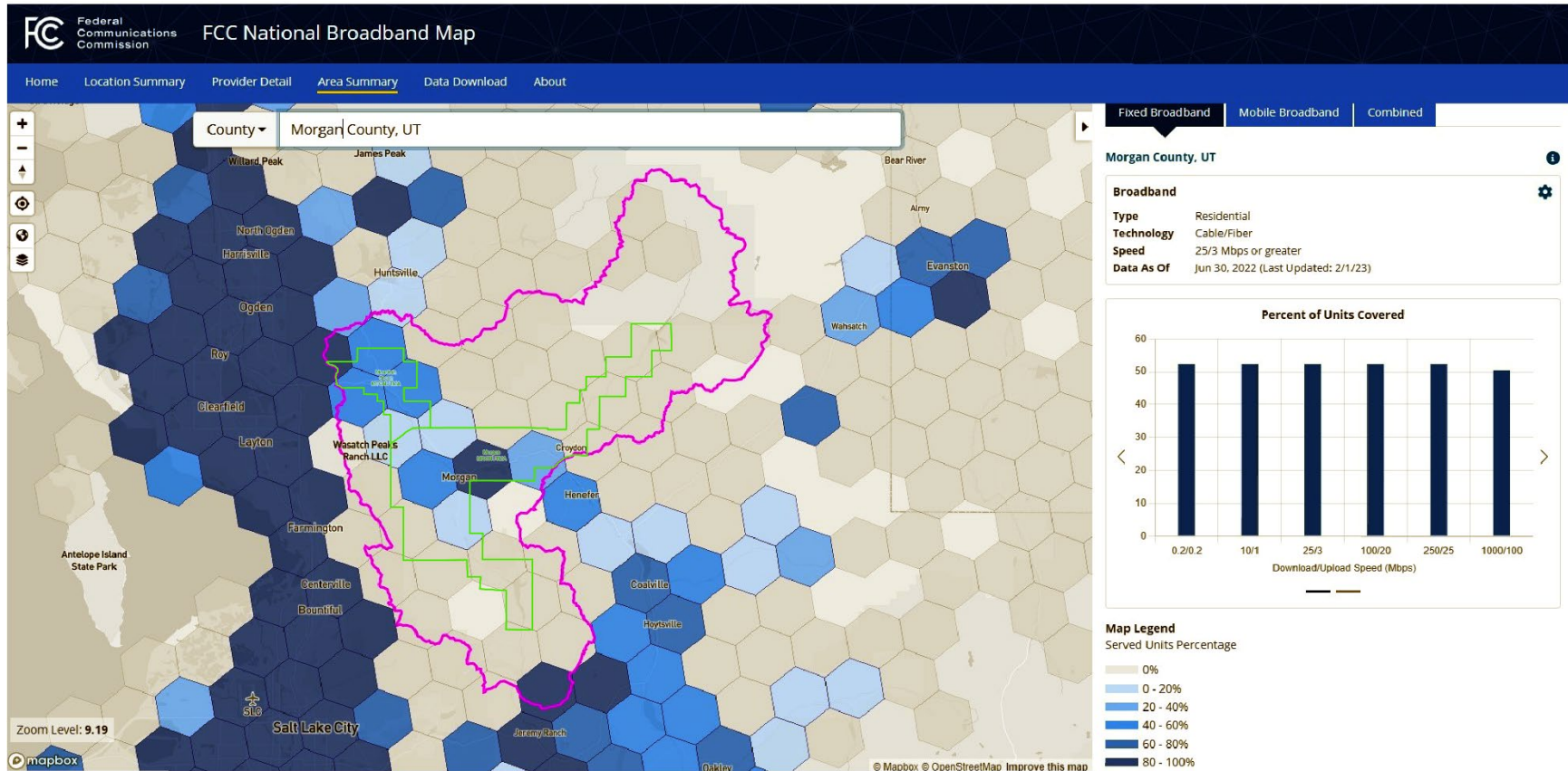
Kane County Cable / Fiber



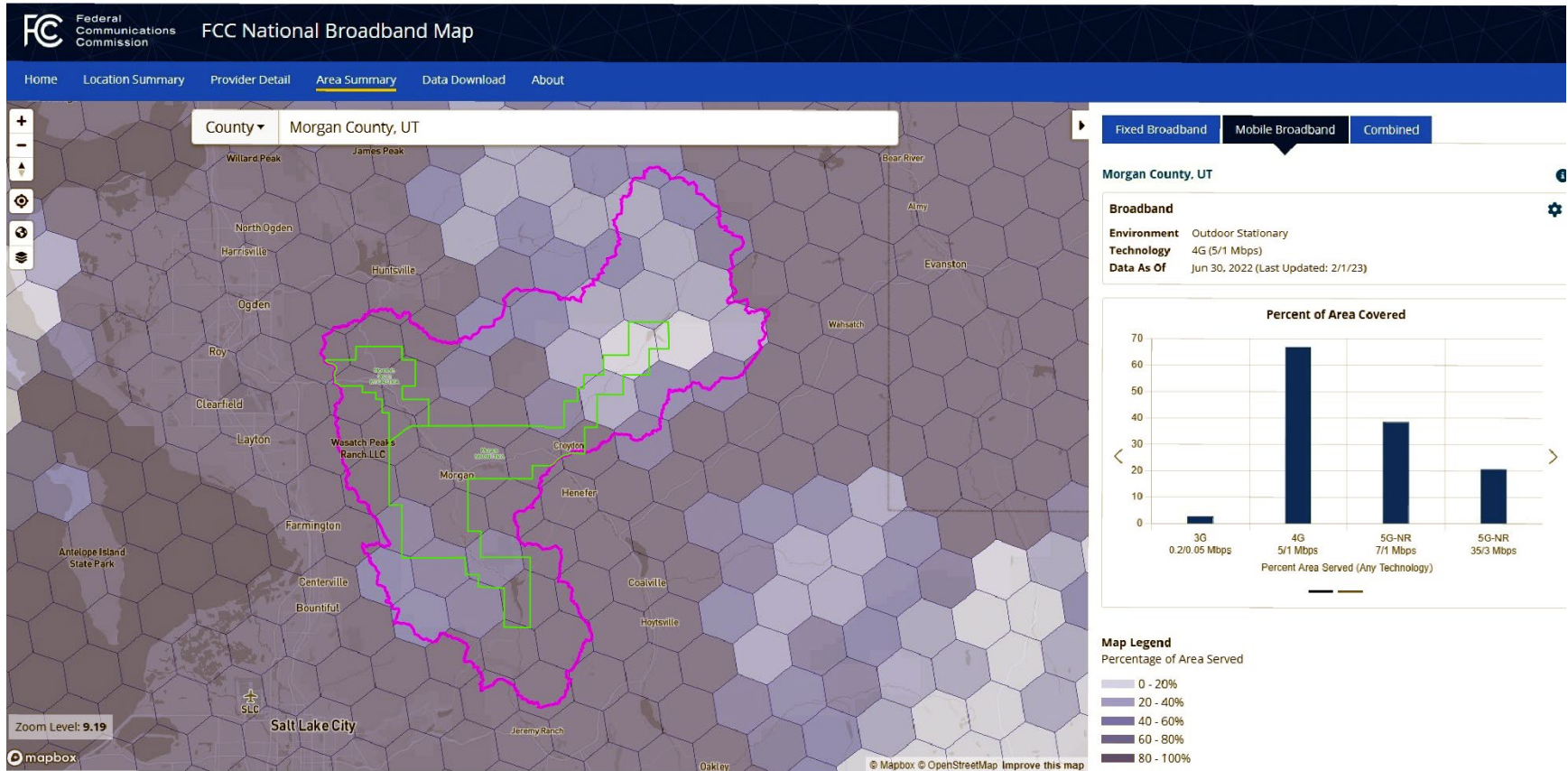
Kane County Mobile



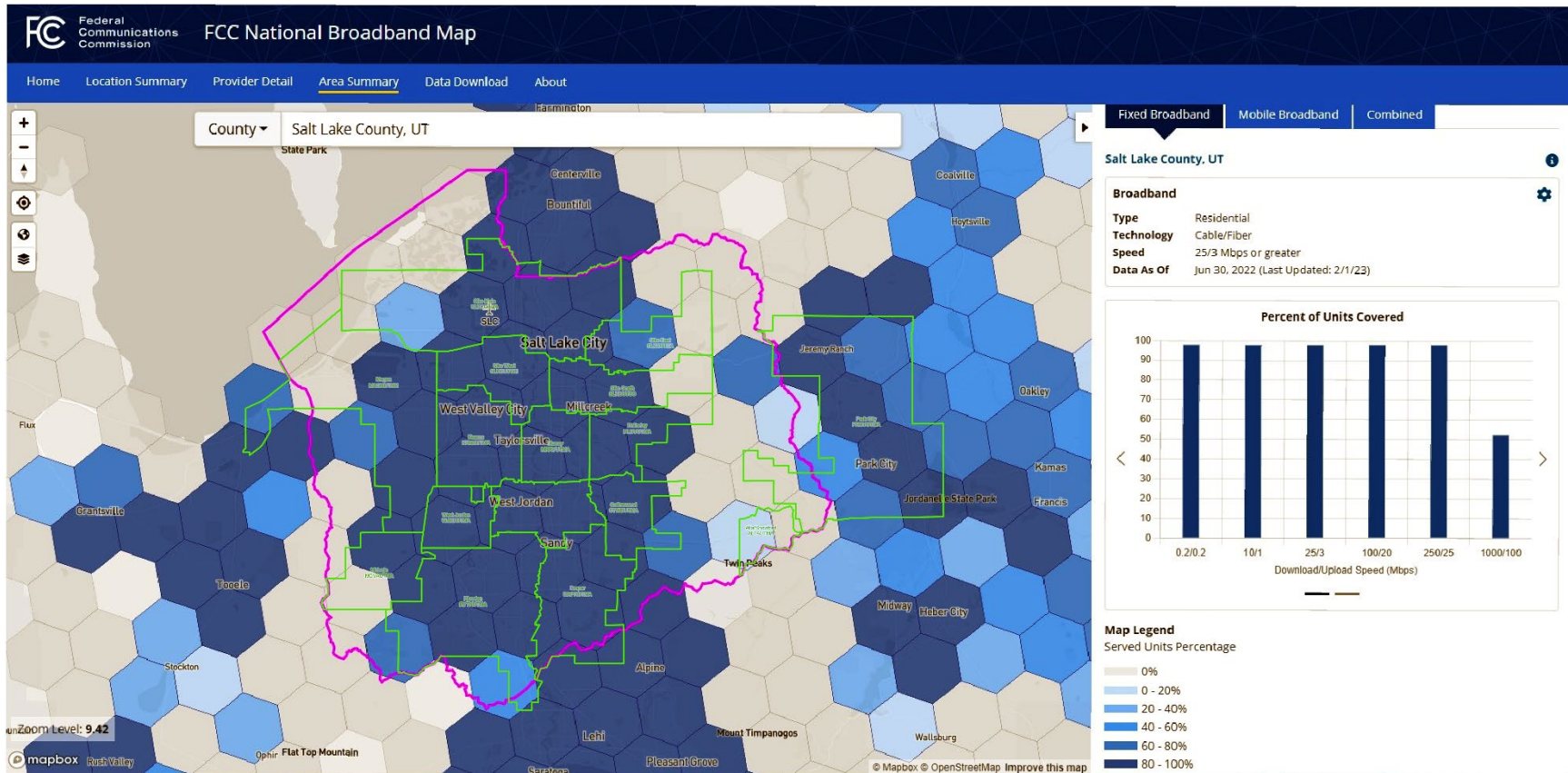
Morgan County Cable / Fiber



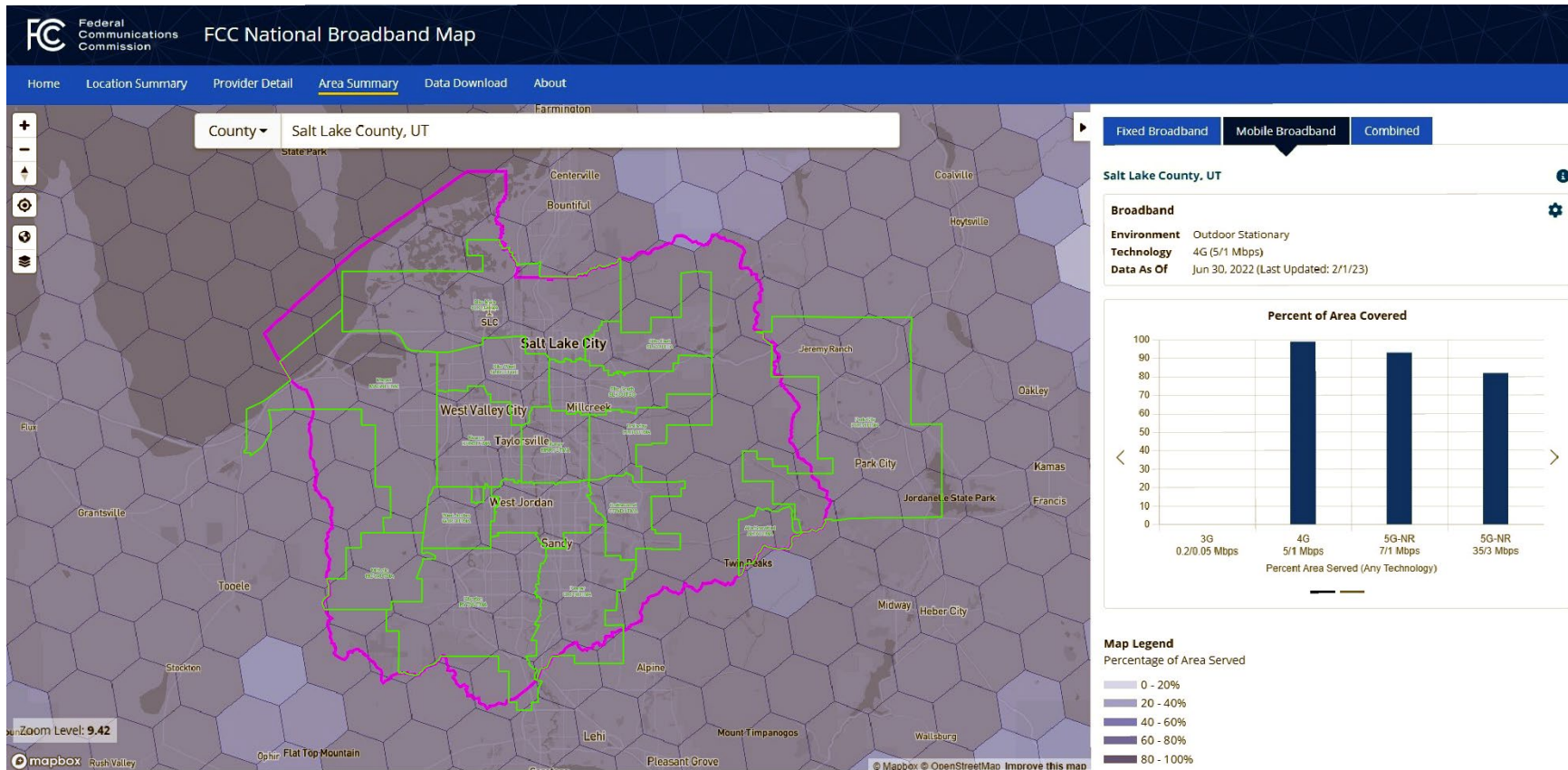
Morgan County Mobile



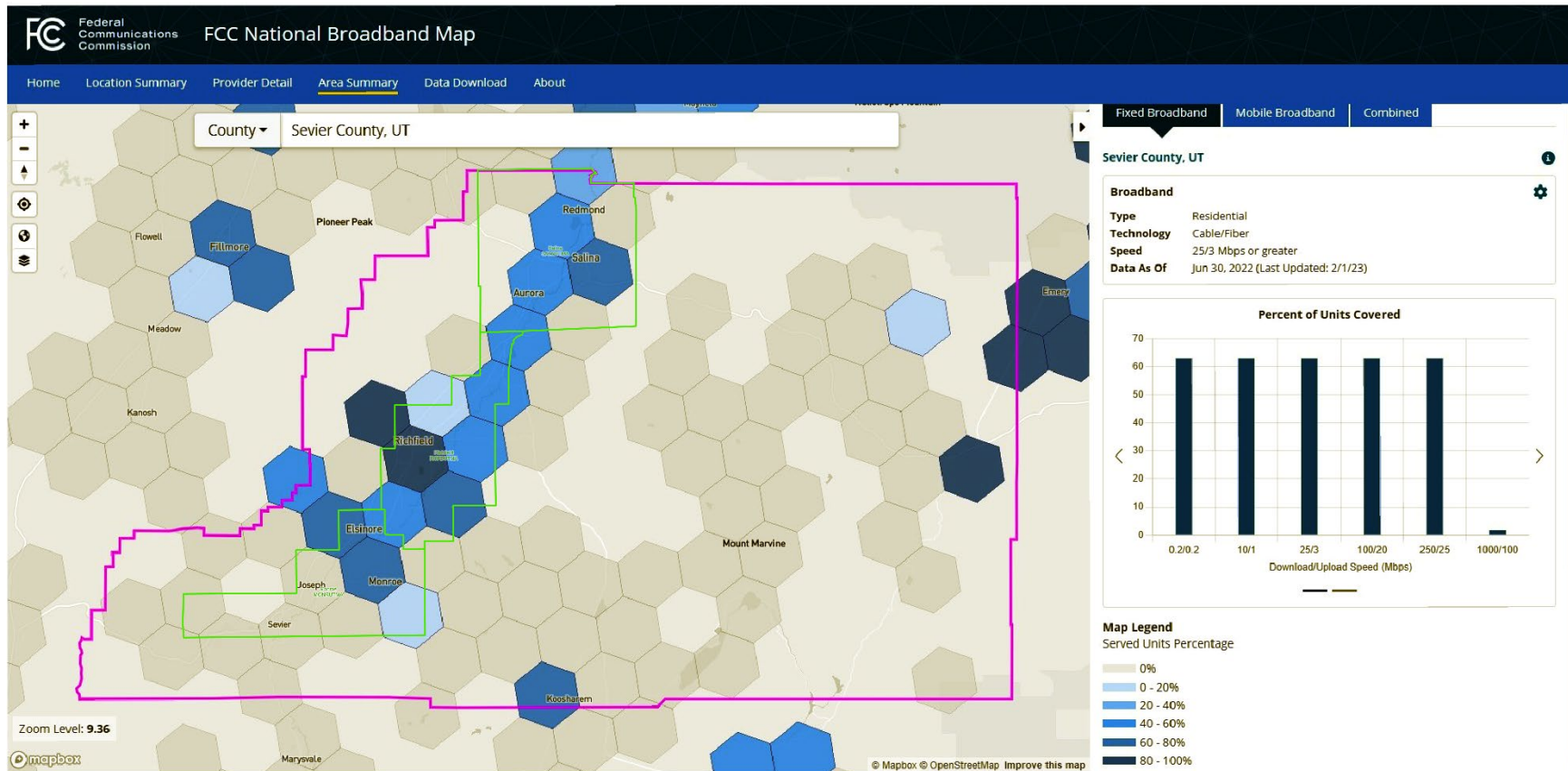
Salt Lake County Cable / Fiber



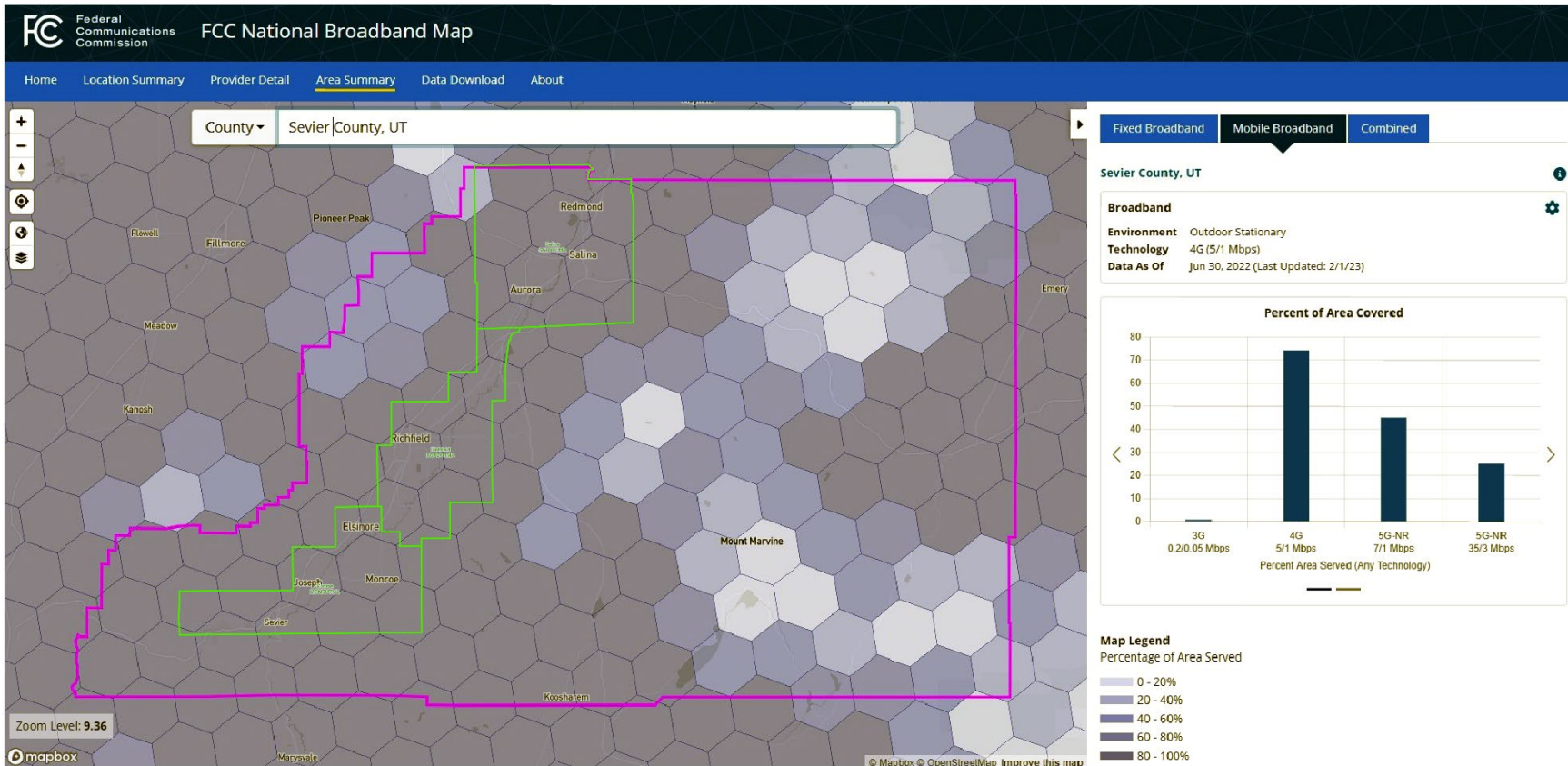
Salt Lake County Mobile



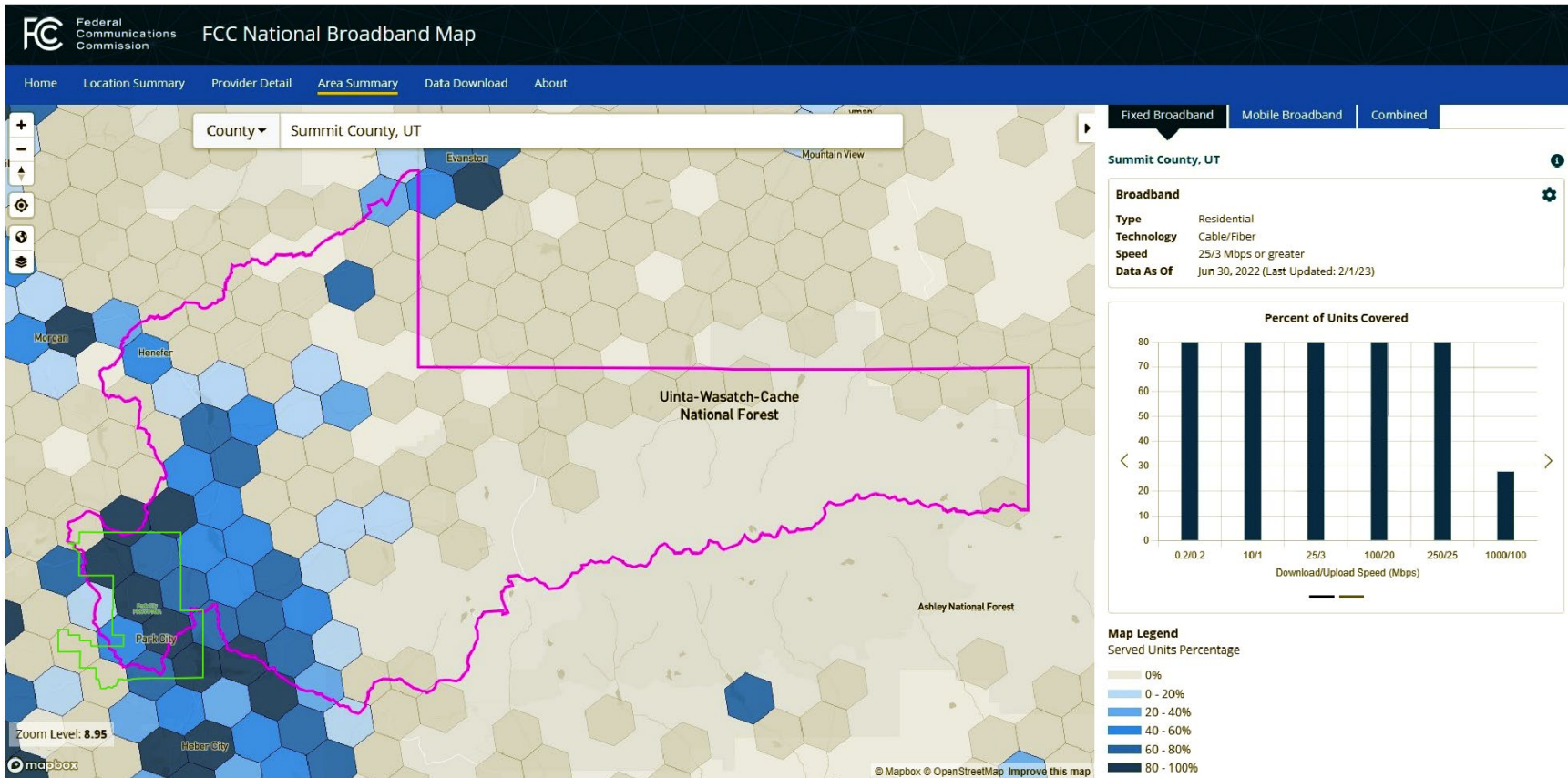
Sevier County Cable / Fiber



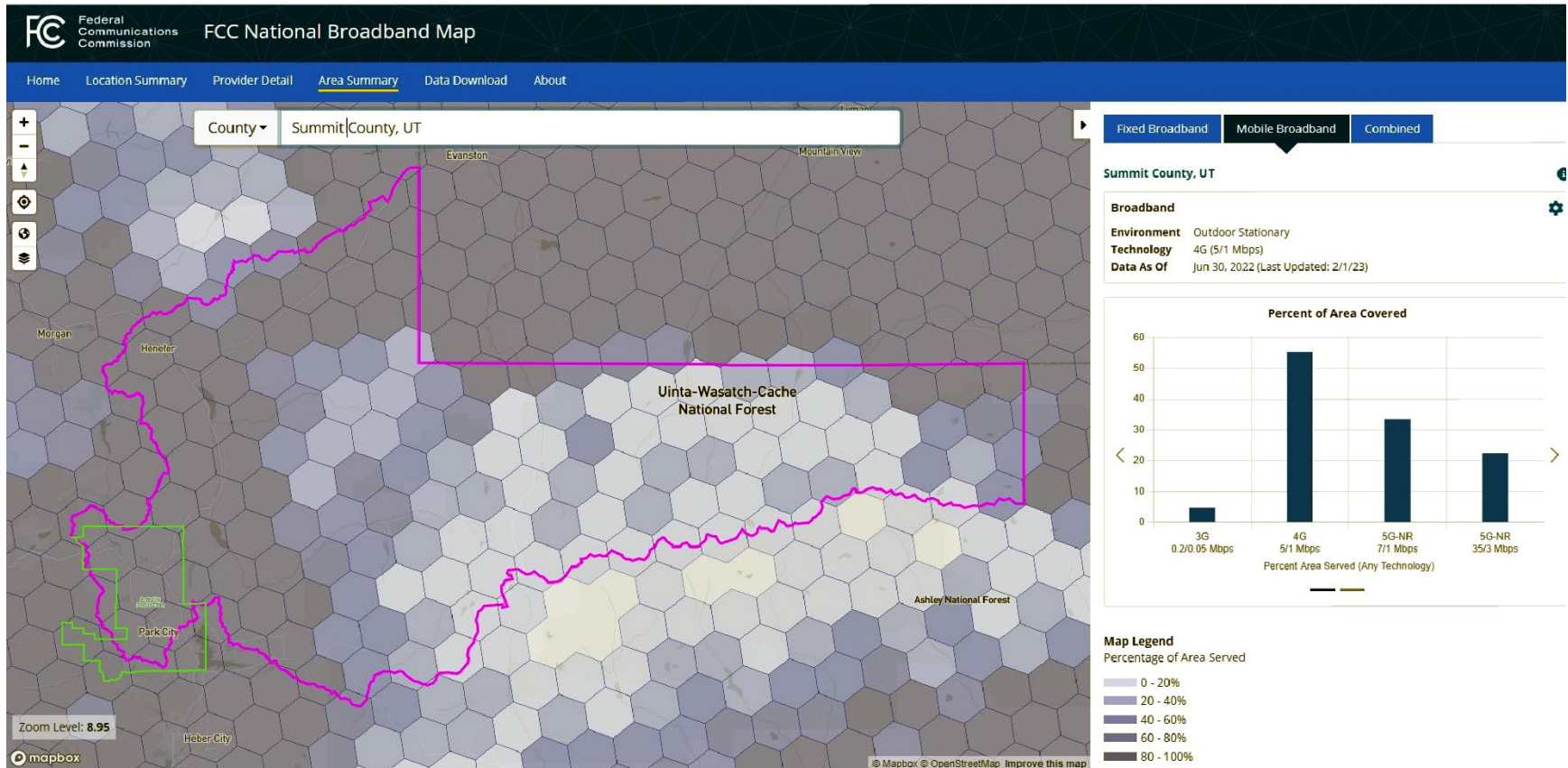
Sevier County Mobile



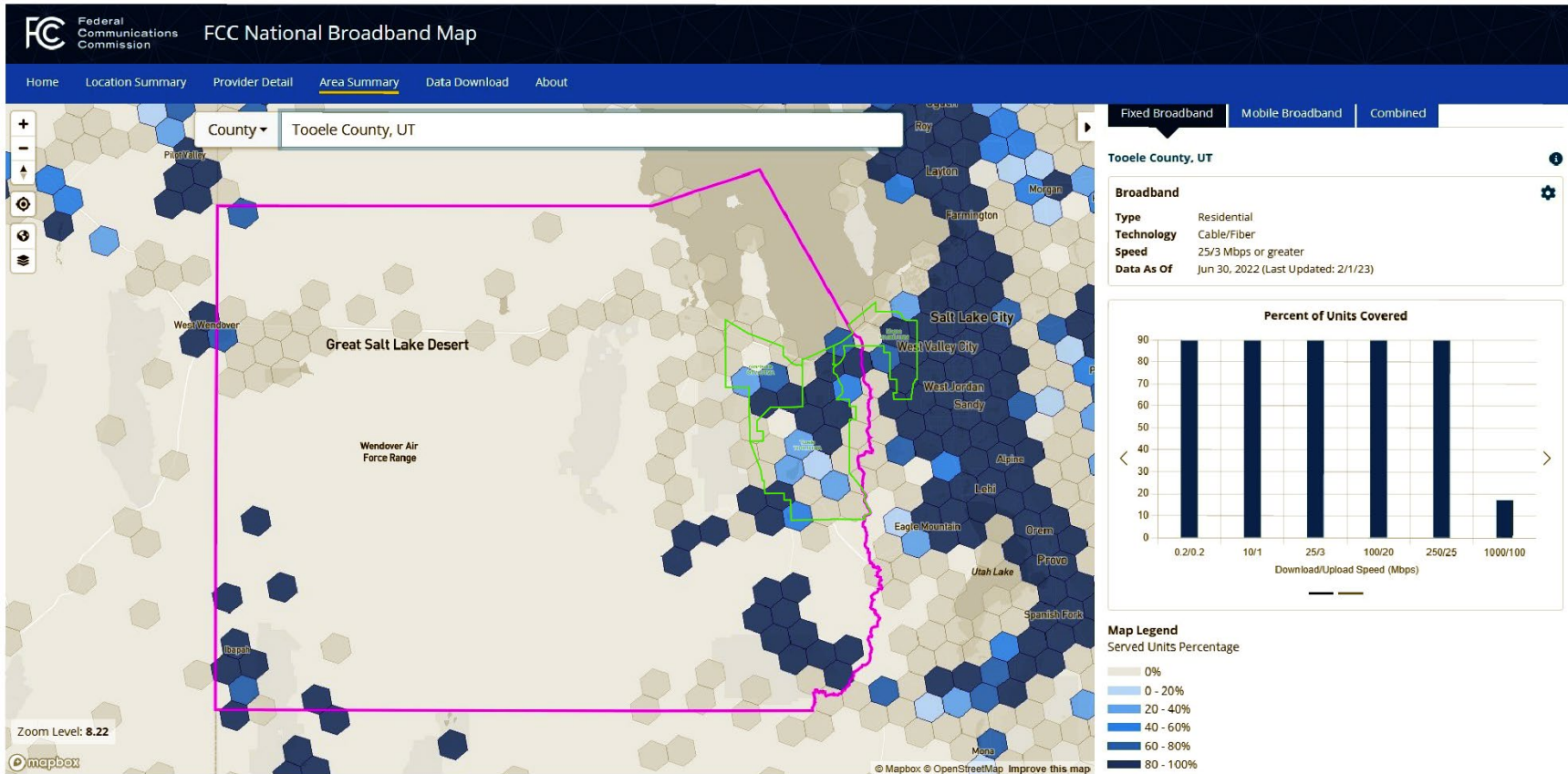
Summit County Cable / Fiber



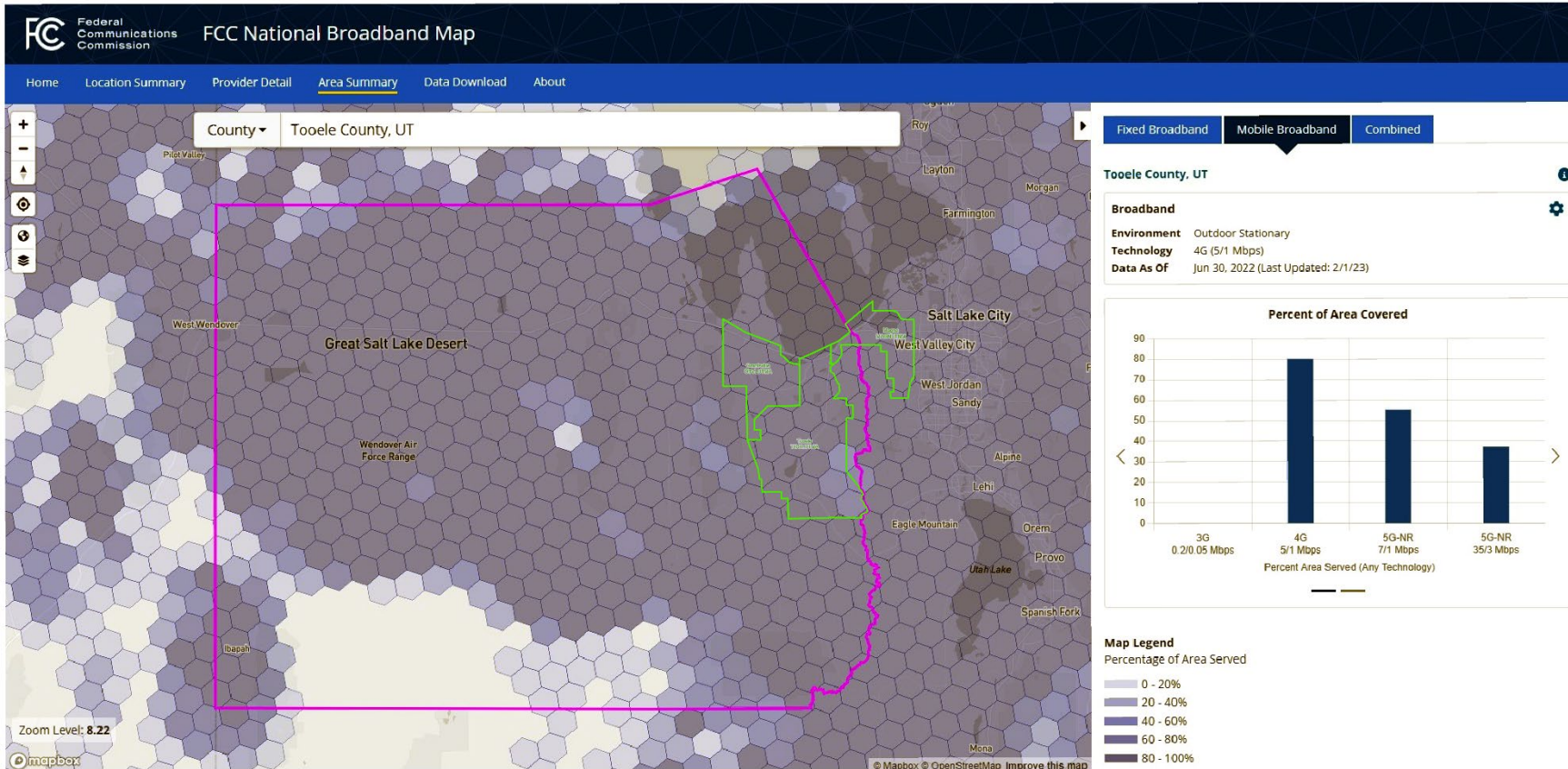
Summit County Mobile



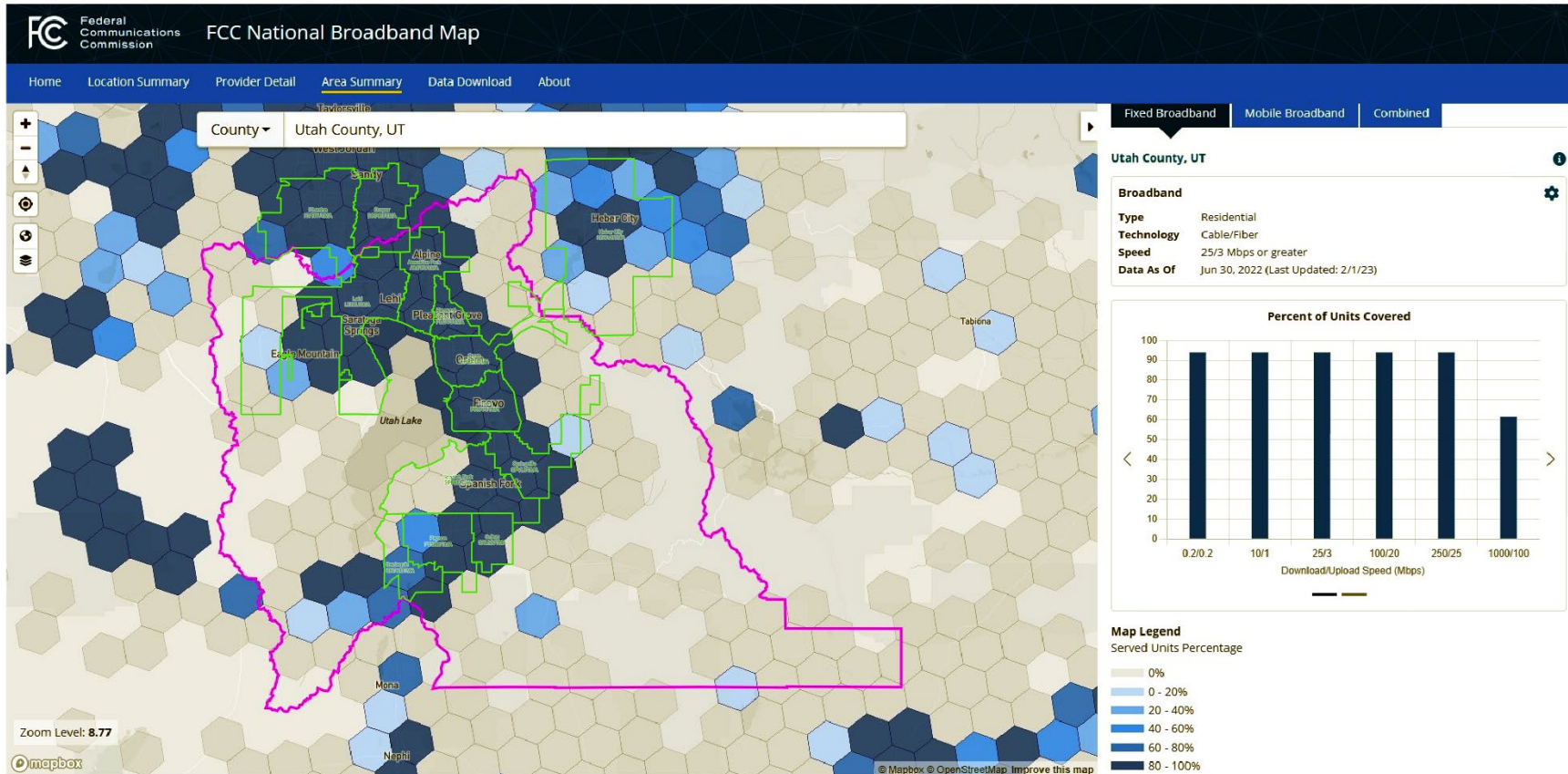
Tooele County Cable / Fiber



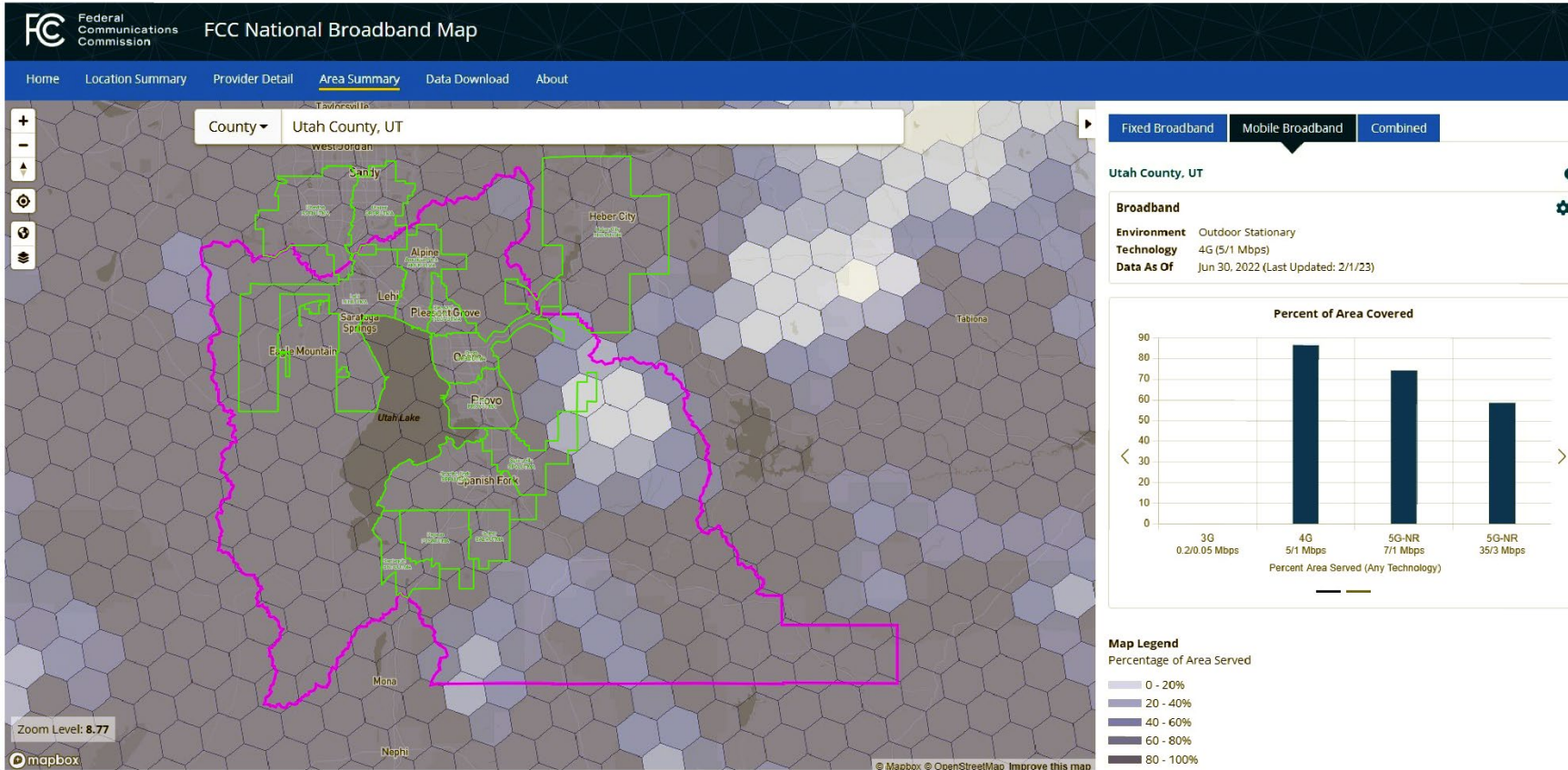
Tooele County Mobile



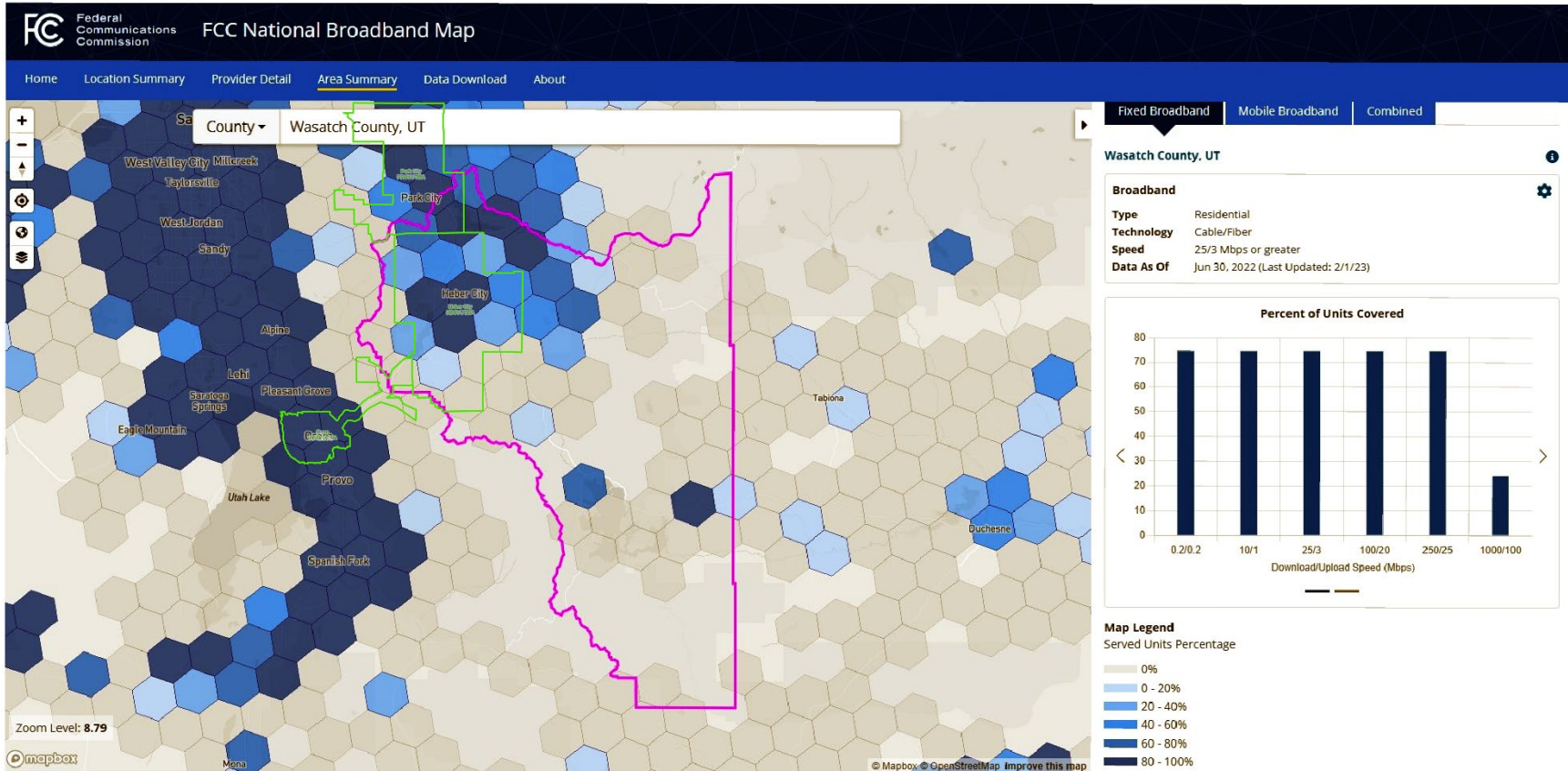
Utah County Cable / Fiber



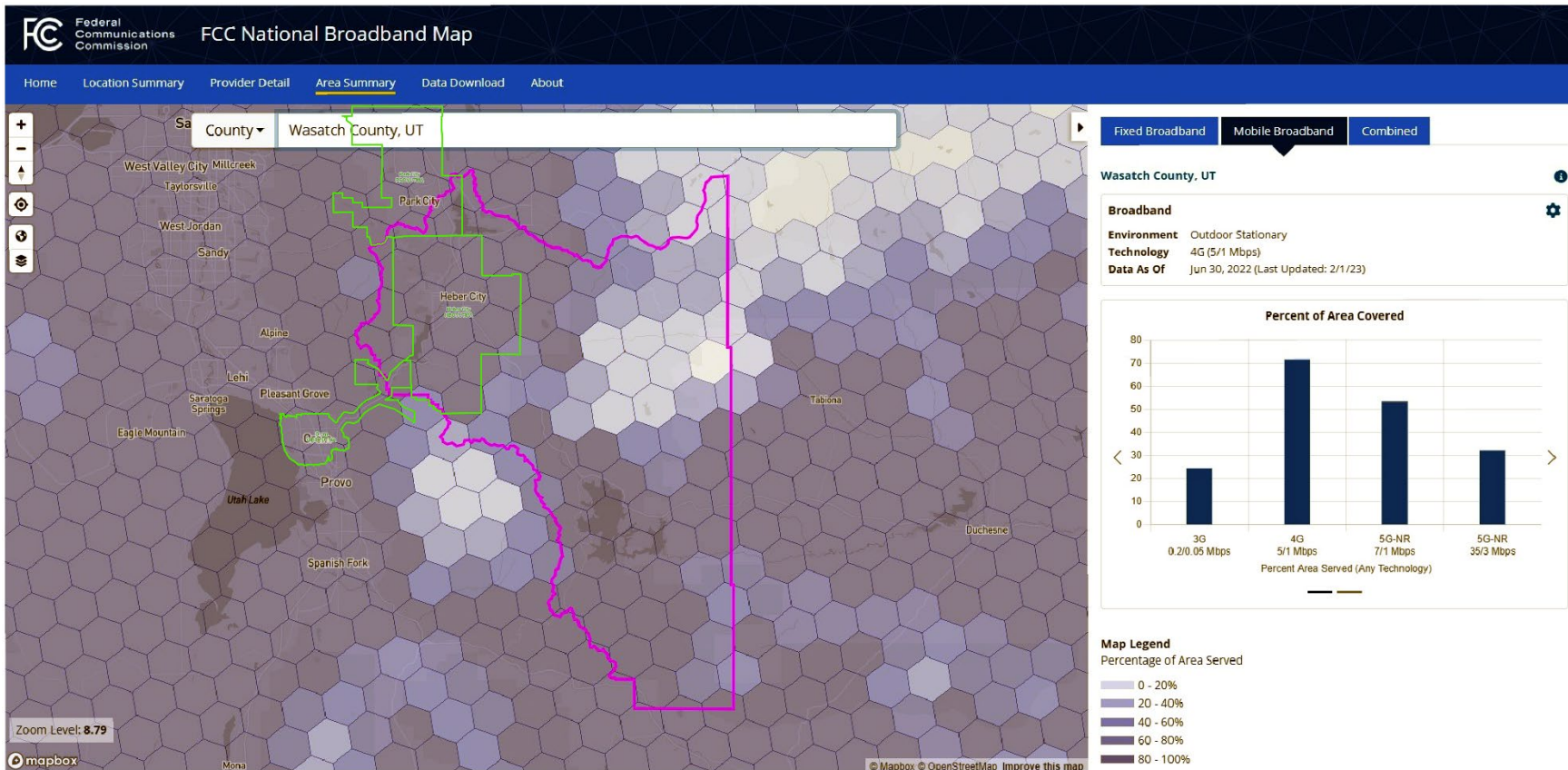
Utah County Mobile



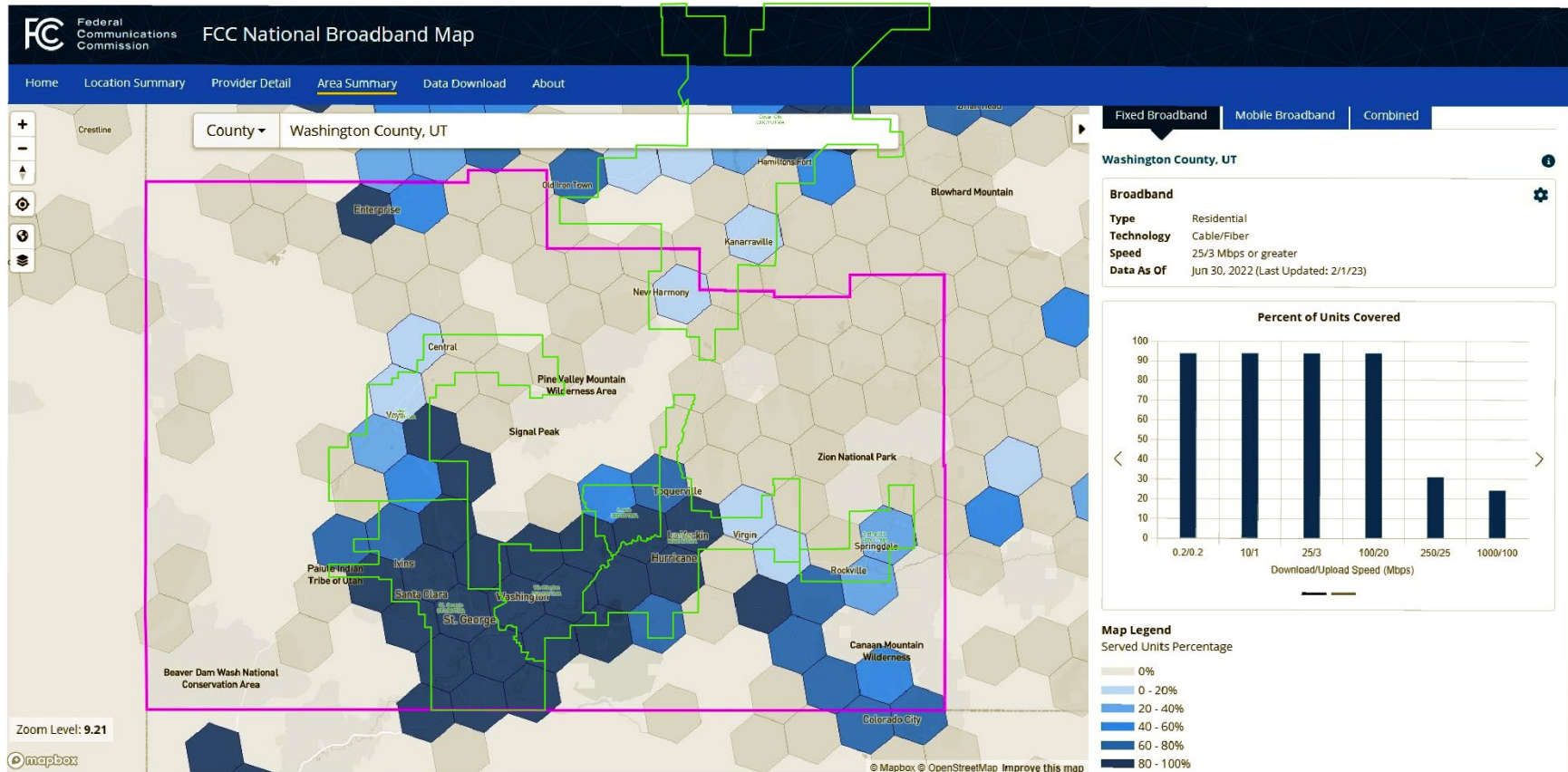
Wasatch County Cable / Fiber



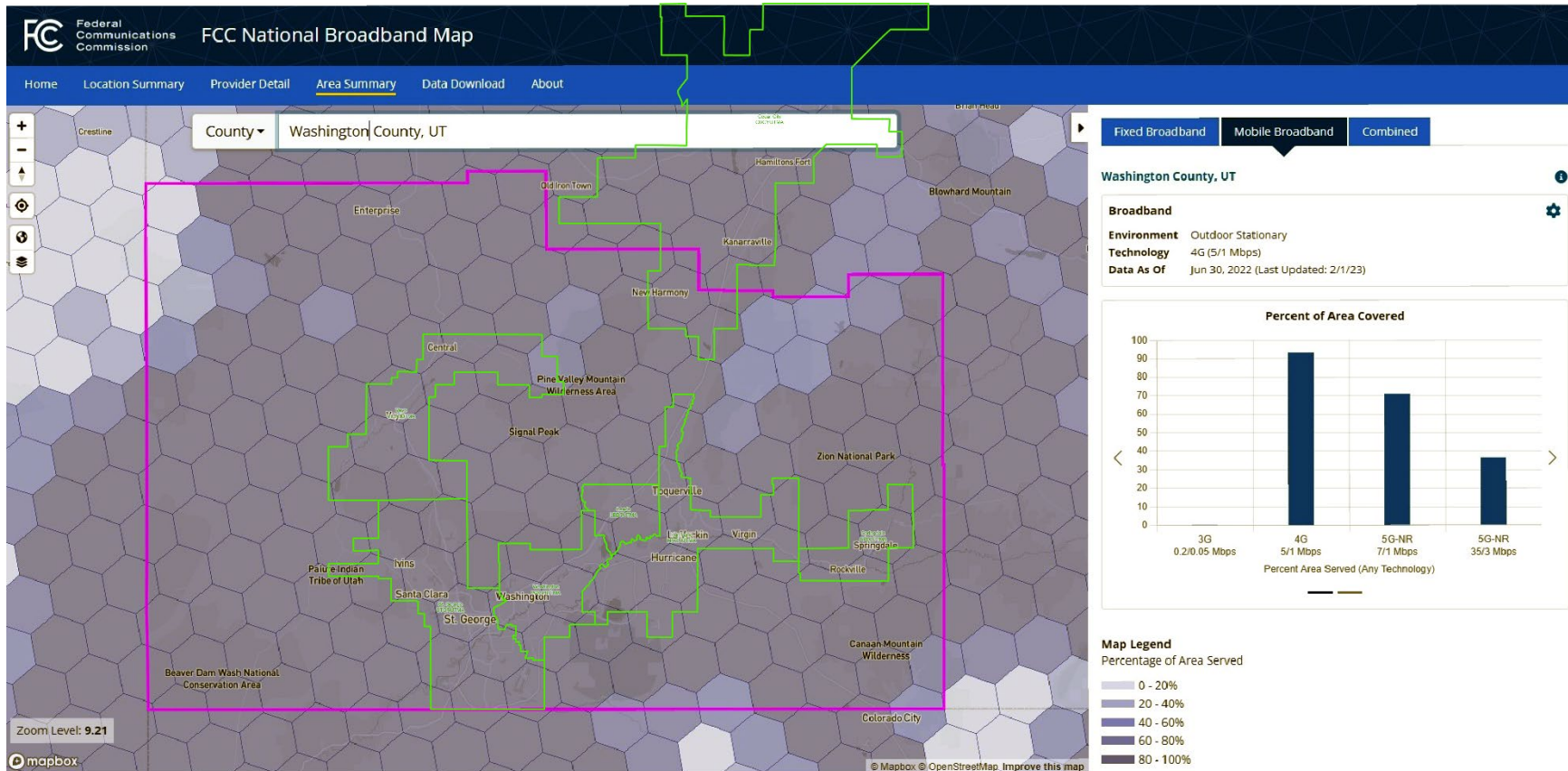
Wasatch County Mobile



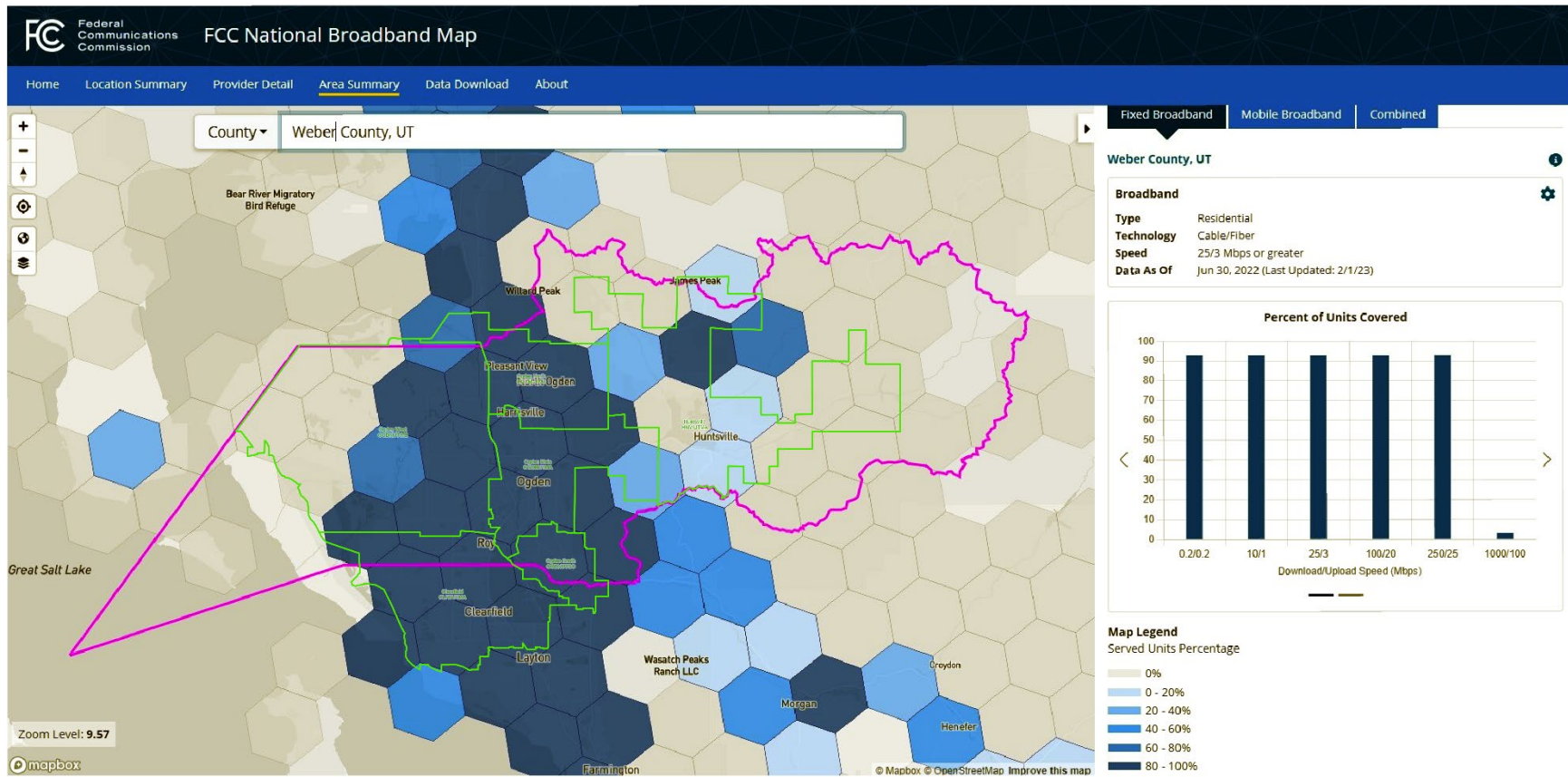
Washington County Cable / Fiber



Washington County Mobile



Weber County Cable / Fiber



Weber County Mobile

