

August 1, 2023

Via Email:
psc@utah.gov

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

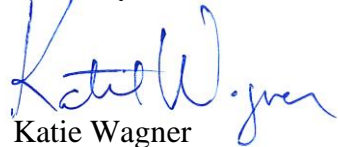
RE: Docket No. 23-049-01
Qwest Corporation dba CenturyLink PC Petition for
Statewide Exemption from Carrier of Last Resort Obligation
Direct Testimony of David Ziegler

Dear Mr. Widerburg:

Attached for filing please find the Direct Testimony of David Ziegler in Support of 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

CENTURYLINK

Katie N. Wagner (OK Bar #33296)
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Counsel for Qwest Corporation dba CenturyLink QC

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

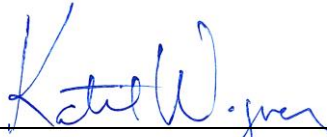
In the Matter of	Docket No. 23-049-01
QWEST CORPORATION DBA CENTURYLINK QC	
Petition for Statewide Exemption from Carrier of Last Resort Obligations	

DIRECT TESTIMONY OF DAVID ZIEGLER

Qwest Corporation dba CenturyLink QC hereby submits the Direct Testimony of David Ziegler in this docket.

DATED this 1st day of August 2023.

CENTURYLINK

By: 
Katie N. Wagner, OK Bar #33296
Senior Corporate Counsel
katie.wagner@lumen.com
405-669-8712

Certificate of Service
Docket No. 23-049-01

I hereby certify that a true and correct copy of the foregoing Direct Testimony of David Ziegler was served by email this 1st day of August 2023 on the following:

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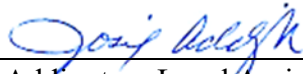
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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of QWEST CORPORATION DBA CENTURYLINK QC Petition for Statewide Exemption from Carrier of Last Resort Obligations	Docket No. 23-049-01
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DIRECT TESTIMONY OF DAVID ZIEGLER

Direct Testimony of David Ziegler

On Behalf of

Qwest Corporation dba CenturyLink QC

August 1, 2023

1 **I. IDENTIFICATION OF WITNESS**

2 **Q. PLEASE STATE YOUR NAME AND CURRENT POSITION.**

3 A. My name is David L. Ziegler. I am employed by Qwest Corporation d/b/a CenturyLink
4 QC (CenturyLink) as Regional Director State & Local Government Affairs and I am
5 providing this testimony on behalf of CenturyLink.

6
7 **Q. WHAT ARE YOUR CURRENT RESPONSIBILITIES?**

8 A. I work with the state government affairs field teams on regulatory, legislative and local
9 government issues for seventeen states including Utah.

10
11 **Q. PLEASE REVIEW YOUR EDUCATIONAL AND EMPLOYMENT**
12 **BACKGROUND.**

13 A. I received a Bachelor of Science degree in Business Administration from Columbia
14 College in 1988 and have also attended numerous industry seminars on economics,
15 management, marketing and technical courses. In addition, I have over 45 years of service
16 with CenturyLink and its predecessors. Between 1978 and 1994 I held multiple
17 assignments including cost of service studies and call center operations. I have been in
18 Government Affairs since 1994 with responsibility for managing multiple state teams,
19 including Utah, for regulatory, legislative and local government affairs.

1 **Q. HAVE YOU PREVIOUSLY TESTIFIED BEFORE THE UTAH PUBLIC**
2 **REGULATION COMMISSION OR OTHER PUBLIC UTILITY COMMISSIONS?**

3 A. I have testified before both the Arizona Corporation Commission and the Colorado Public
4 Utilities Commission on numerous occasions. In addition, I have testified before the
5 Illinois Commerce Commission and the New Mexico Public Regulation Commission. This
6 is the first time I have testified before the Utah Public Service Commission.
7

8 **II. PURPOSE OF TESTIMONY**

9 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

10 A. The purpose of my testimony is to support the *Petition of Qwest Corporation d/b/a*
11 *CenturyLink QC for Statewide Exemption from Carrier of Last Resort Obligations*. The
12 objective of my testimony is to provide information related to CenturyLink’s current COLR
13 obligations and explain what facts support exempting CenturyLink from COLR obligations.
14

15 **Q. WHAT STATUTE GOVERNS CENTURYLINK QC’S PETITION?**

16 A. CenturyLink QC is filing pursuant to Utah Code § 54-8b-3, which provides:

17 The commission, on its own initiative or in response to an application
18 by a telecommunications corporation, a public agency, or a user of a
19 public telecommunications service, may, after public notice and a
20 hearing, issue an order exempting any telecommunications corporation
21 or public telecommunications service from any requirement of this
22 title... (Utah Code § 54-8b-3(1)(a)).
23

24 An exemption may be granted for the entire service territory of a
25 telecommunications corporation or for a specific geographic area of the
26 service territory. (Utah Code § 54-8b-3(3)).
27

28 The commission may issue an order for an exemption only if it finds
29 that: (a) the telecommunications corporation or service is subject to
30 effective competition; and (b) the exemption is in the public interest.
31 (Utah Code § 54-8b-3(4)).

1
2 In determining if the telecommunications corporation or service is
3 subject to effective competition, the commission shall consider all
4 relevant factors, which may include: (a) the extent to which competing
5 telecommunications services are available from alternative
6 telecommunications providers; (b) the ability of alternative
7 telecommunications providers to offer competing telecommunications
8 services that are functionally equivalent or substitutable and reasonably
9 available at comparable prices, terms, quality, and conditions; (c) the
10 market share of the telecommunications corporation for which an
11 exemption is proposed; (d) the extent of economic or regulatory barriers
12 to entry; (e) the impact of potential competition; and (f) the type and
13 degree of exemptions to this title that are proposed. (Utah Code § 54-
14 8b-3(5)).

15
16 In determining if the proposed exemption is in the public interest, the
17 commission shall consider, in addition to other relevant factors, the
18 impact the proposed exemption would have on captive customers of the
19 telecommunications corporation. (Utah Code § 54-8b-3(6)).
20

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

23 Carrier of last resort means: (i) an incumbent telephone corporation; or
24 (ii) a telecommunications corporation that, under Section 54-8b-2.1:
25 (A) has a certificate of public convenience and necessity to provide
26 local exchange service; and (B) has an obligation to provide public
27 telecommunications service to any customer class of customers that
28 requests service within the local exchange.
29

30 **Q. FOR WHICH SERVICES IS CENTURYLINK REQUESTING A**
31 **DETERMINATION OF EFFECTIVE COMPETITION?**

32 **A.** CenturyLink is petitioning for statewide relief from the obligation to provide voice
33 service to non-CenturyLink served customer locations.
34

35 **Q. IS CENTURYLINK PETITIONING FOR AN ORDER ALLOWING**
36 **DISCONTINUENCE OF EXISTING CUSTOMERS?**

1 A. No. This petition is not a request for discontinuance to any existing customers, and
2 thus has no impact on existing customers.

3
4 **Q. PLEASE DESCRIBE OTHER STATES IN WHICH CENTURYLINK HAS**
5 **OBTAINED RELIEF FROM CARRIER OF LAST RESORT OBLIGATIONS.**

6 A. CenturyLink has obtained relief from COLR obligations in 13 states via either commission
7 order or legislative change. CenturyLink no longer has carrier of last resort obligations in
8 Alabama, Colorado, Florida, Georgia, Indiana, Iowa, Missouri, Mississippi, Montana,
9 Nevada, North Carolina, Wisconsin, and Wyoming. These various commission orders and
10 legislative changes highlight a growing number of states that recognize telecommunication
11 is an evolving marketplace where landline voice services are no longer receiving funding
12 support and customers continue to turn to competing services for voice communication.

13
14 **Q. WHAT EVIDENCE ARE YOU PRESENTING IN SUPPORT OF THE PETITION?**

15 A. I am relying on publicly available historical facts, Exhibit 1 (Utah households by
16 technology preference), Exhibit 2 (Utah access line loss), Exhibit 3 (share of Utah voice
17 connections), Confidential Exhibit 4 (CenturyLink’s estimated Utah household voice
18 percentage per wire center), Exhibit 5 (Utah’s telecommunication coverage by wire center
19 and county), and Exhibit 6 (FCC National Broadband Map as of December 2022 for any
20 technology with speeds of 25/3 or greater). These exhibits demonstrate the extremely
21 competitive nature of telecommunications in Utah and why CenturyLink can no longer
22 bear the financial burden of Carrier of Last Resort obligations alone in its service area and
23 should be exempted from the Carrier of Last Resort obligation.

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Q. PLEASE DESCRIBE RELEVANT HISTORICAL CONTEXT.

A. CenturyLink is a non-rate of return regulated carrier of last resort provider of telecommunications in the state of Utah. Historically, the FCC established a Universal Service Fund (“USF”) to help ILECs recover the disproportionately high cost of serving rural areas. More recently, the FCC established the Connect America Fund (“CAF”) and later the CAF II, to replace the traditional USF. CAF II was then replaced by the Rural Digital Opportunity Fund (“RDOF”), which relied on an auction process to support voice and broadband in high-cost locations. Unlike the CAF, where ILECs had the right of first refusal in the funding grants, the RDOF was made available to all providers. 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.

Although funding mechanisms for high-cost areas has evolved over time, CenturyLink’s obligation to provide service has not. Notably, these funding mechanisms are not limited to providing landline voice services as contemplated by CenturyLink’s carrier of last resort obligation. Instead, CAF, CAF II, and RDOF recognized a demand for voice over internet protocol (“VoIP”) as well as broadband generally as a desired means of connectivity.

1 **Q. PLEASE DESCRIBE EXHIBIT 1.**

2 **A.** Exhibit 1 is a graphic of an annual study conducted by the Centers for Disease Control and
3 Prevention, National Center for Health Statistics, National Health Interview Survey Early
4 Release Program (CDC) reflecting 2020 results by state. This graphic uses Table 1
5 reflecting modeled estimates of the percent distribution of personal telephone status for
6 adults aged 18 and over for Utah which estimates that 72.8% of consumers have “cut the
7 cord” in Utah as of 2020. On the other hand, only 1.9% of Utah households use landline
8 only. The source document of Exhibit 1 and is available at the following url:
9 https://www.cdc.gov/nchs/data/nhis/earlyrelease/Wireless_state_202212.pdf. Exhibit 1
10 depicts the voice service preference of Utah households. . Exhibit 1 demonstrates that by
11 continuing COLR obligations, the prospect that a hypothetical, not-yet-existing customer
12 might one day want landline voice service will divert future resources away from the
13 majority 98.1% of Utahns that are not landline voice only consumers.

14

15 **Q. PLEASE DESCRIBE EXHIBIT 2.**

16 **A.** Exhibit 2 depicts CenturyLink’s fixed voice subscription access lines as reported to the
17 FCC on Form 477. This exhibit shows that since 2005, customer demand for landline
18 service has declined predictably and precipitously. CenturyLink has lost over 87% of its
19 access lines in Utah to competition since 2005. With this decline in landline service, it has
20 become increasingly difficult to offset the obligation associated with serving high-cost
21 areas against historically low-cost, densely populated areas as those low-cost areas
22 continue to turn away from landline service.

23

1 **Q. PLEASE DESCRIBE EXHIBIT 3.**

2 **A.** Exhibit 3 is a graphic depicting the CenturyLink share of Utah voice connections using
3 FCC Voice Subscriptions from June 30, 2021. Based on FCC data, this exhibit shows that
4 as of June 2021, at least 94.4% of voice connections were not landlines. 79.3% of voice
5 connections in Utah was attributable to mobile phone and an additional 15.1% was
6 attributable to VoIP. The FCC Voice Subscriptions document provides line counts for
7 Mobile Telephony (Line 1), ILEC (Line 14), Non-ILEC (Line 15) and VoIP (Line 22)
8 providers. The CenturyLink percentage was estimated by using CenturyLink Utah Form
9 477 data (129,000) for the matching time period, June 2021, and subtracting it from the
10 ILEC number (187,000) to estimate the CenturyLink percentage. The remainder (58,000)
11 of the ILEC number is the estimated RLEC percentage. The source document is also
12 available at the following url: <https://www.fcc.gov/voice-telephone-services-report>
13 Click on 2021 State-Level Subscriptions for the report.
14

15 **Q. PLEASE DESCRIBE CONFIDENTIAL EXHIBIT 4.**

16 **A.** Confidential Exhibit 4 provides an estimate of the residential households in Utah served
17 by CenturyLink (market share of the telecommunications corporation for which an
18 exemption is proposed) in its service area by wire center. The number of CenturyLink
19 access lines as reported to the FCC on Form 477 for each wire center as of June 2022 was
20 used as the numerator. CenturyLink used the estimated number of households, provided
21 by Experian for each wire center as the denominator. Experian collects and aggregates
22 demographic data, e.g., the number of households for a given area in addition to its
23 consumer credit reporting operations. The residential access lines reported to the FCC on
24 Form 477 for each wire center is divided by the estimated residential households provided
25 by Experian for each wire center to estimate the percentage of CenturyLink served

1 households in each wire center.

2
3 **Q. PLEASE DESCRIBE EXHIBIT 5.**

4 **A.** Exhibit 5 is developed using data from the FCC National Broadband Map released in
5 November 2022. The FCC states: The National Broadband Map provides information
6 about the internet services available to individual locations across the country, along with
7 new maps of mobile coverage, as reported by Internet Service Providers (ISPs) in the
8 FCC's ongoing Broadband Data Collection. The previous reporting tool used census block
9 level reporting rather than location specific reporting used in the National Broadband Map
10 which makes the National Broadband Map more accurate. In Exhibit 5, the data is captured
11 on an area summary basis by Utah county and the corresponding CenturyLink wire centers
12 in each county are identified. There are five columns on Exhibit 5 with each column
13 representing the percentage of coverage in a county by selected technology types: %
14 Coverage All Wired and Fixed Wireless (Licensed), % Coverage All Wired, % Coverage
15 Cable and Fiber, % Coverage Fixed Wireless (Licensed) and % Coverage Mobile. The All
16 Wired, Fixed Wireless (Licensed) column includes copper, fiber and cable. In addition, it
17 also includes licensed Fixed Wireless. The All Wired column includes copper, fiber and
18 cable but excludes the licensed Fixed Wireless. The Cable / Fiber column is cable and fiber
19 only and excludes copper. The licensed Fixed Wireless column is licensed Fixed Wireless
20 providers only. The Mobile column is mobile wireless providers only. The numbers at the
21 bottom of the column headers (25/3 or 5/1) reflect the broadband speed that is reflected in
22 the percentages. Satellite and Unlicensed Fixed Wireless providers are excluded from
23 Exhibit 5. The attached maps in Exhibit 5 reflect the % Coverage Cable / Fiber column by

1 wire center. The National Broadband Map also allows searches by address and provides
2 a list of available broadband providers and broadband speeds by provider for that specific
3 address. Exhibit 5 utilizes summary data by county. Note that Exhibit 5 does not account
4 for satellite coverage, such as Starlink, Viasat, and HughesNet. Had satellite service been
5 included, there would be coverage in 100% of wire centers.

6
7 **Q. PLEASE DESCRIBE EXHIBIT 6.**

8 **A.** Exhibit 6 depicts the FCC National Broadband Map as of December 2022 for any
9 technology with speeds of 25/3 or greater. This exhibit contains a list of the top 10
10 residential telecommunication providers in Utah with respect to the percentage of
11 broadband coverage by these providers in Utah. Lumen Technologies (CenturyLink) is
12 listed as the 6th largest provider in Utah. Space Exploration (Starlink) and HughesNet are
13 listed as having 100% coverage of existing units, followed by Viasat, Comcast, T-Mobile,
14 and then CenturyLink.

15
16 **Q. WHAT DO THESE EXHIBITS TAKEN TOGETHER INDICATE?**

17 **A.** All of the Exhibits paint the same portrait – that effective competition exists in Utah and
18 that a COLR exemption is in the public interest. Exhibits 2 and 4 use CenturyLink trending
19 access line data and estimated housing units to demonstrate that CenturyLink has lost over
20 87% of its access lines to competition since 2005. CenturyLink has small market share
21 and is no longer a dominant provider of voice services in its wire centers. Exhibit 1 uses
22 CDC data and it corroborates the competitive losses identified in Exhibits 2 and 4.
23 Customers have voted with their wallets and are finding the competitive alternatives
24 functionally equivalent or suitable and reasonably available at comparable prices, terms,

1 quality, and conditions. These competitive losses indicate the extent to which competing
2 telecommunications services are available from alternative telecommunications providers
3 and that there are no economic or regulatory barriers to entry. Access line loss and market
4 share alone prove there is effective competition in all of CenturyLink's wire centers in Utah
5 irrespective of the technology.

6
7 **Q. WHY SHOULD THIS DATA BE CONSIDERED ON THE BASIS OF USE PER**
8 **WIRE CENTER?**

9 **A.** Wire centers are how the telecommunications industry operates and has been in use for
10 decades. Use of wire center data allows CenturyLink to reflect its market share for voice
11 services, which is the objective of determining whether effective competition in a given
12 marketplace exists.

13
14 **Q. WHAT STATE OR FEDERAL FUNDING DOES CENTURYLINK RECEIVE IN**
15 **ORDER TO PAY FOR *BUILDING* NEW INFRASTRUCTURE REQUIRED BY**
16 **THE EXISTING MANDATORY OBLIGATION TO PROVIDE VOICE**
17 **SERVICE?**

18 **A.** None. CenturyLink receives no state or federal funding in support of high-cost carrier of
19 last resort services. Currently, each time a new customer requests service, CenturyLink is
20 required to shoulder the cost of building out that new infrastructure to a new customer
21 subject to its line extension policy. This can be especially expensive in rural areas or areas
22 with terrain that is difficult or mountainous. To the extent that CenturyLink may be able
23 to apply for a one-time distribution from Utah's Universal Service Fund, it is unclear what
24 amount that funding would be. It may not cover the entire cost of a new build, and that

1 funding cannot be used to cover the cost of maintaining the infrastructure after the build
2 is completed.

3
4 **Q. WHAT STATE OR FEDERAL FUNDING DOES CENTURYLINK RECEIVE IN**
5 **ORDER TO PAY FOR *MAINTAINING* INFRASTRUCTURE REQUIRED BY THE**
6 **EXISTING MANDATORY OBLIGATION TO PROVIDE VOICE SERVICE?**

7 **A.** None. CenturyLink receives no state or federal funding in support of high-cost carrier of
8 last resort services. While it is true that a line-extension tariff exists, that tariff only
9 requires a new customer to pay for the cost of building the new service. Nothing in the
10 line-extension tariff supplements the cost to *maintain* newly built or existing infrastructure
11 over the life of the service. As mentioned, the cost to build new infrastructure can be
12 especially expensive in rural areas or areas with terrain that is difficult or mountainous, so
13 from a practical perspective, use of the line-extension tariff by many Utah citizens may
14 not be financially feasible, making it functionally impractical for consumers.

1 **III. EFFECTIVE COMPETITION**

2 **Q. CONSISTENT WITH § 54-8b-3(5)(a), PLEASE DESCRIBE THE EXTENT TO**
3 **WHICH COMPETING TELECOMMUNICATION SERVICES ARE AVAILABLE**
4 **FROM ALTERNATIVE TELECOMMUNICATIONS PROVIDERS.**

5 **A.** As depicted in Exhibit 1, effective competition is shown by virtue of the fact that only 1.9%
6 of customers now use landline as their only source of voice service. Combining wireless
7 only users, wireless mostly users, and dual landline/wireless users, competing wireless
8 service providers now serve 96.1% of the market share. As depicted in Exhibit 3, effective
9 competition is shown by virtue of the fact that CenturyLink’s share of voice connections
10 in Utah only accounts for 3.2% of all voice connections in the state. When viewing the data
11 from this perspective, VoIP and mobile account for 94.4% of all voice connections.

12
13 **Q. CONSISTENT WITH § 54-8b-3(5)(b), PLEASE DESCRIBE THE ABILITY OF**
14 **ALTERNATIVE TELECOMMUNICATIONS PROVIDERS TO OFFER**
15 **COMPETING TELECOMMUNICATIONS SERVICES THAT ARE**
16 **FUNCTIONALLY EQUIVALENT OR SUBSTITUTABLE AND REASONABLY**
17 **AVAILABLE AT COMPARABLE PRICES, TERMS, QUALITY, AND**
18 **CONDITIONS.**

19 **A.** As demonstrated on Exhibits 1 through 5, the Exhibits all tell the same story, that
20 consumers have found competing telecommunications services that they have deemed are
21 functionally equivalent or substitutable and reasonably available at comparable prices,
22 terms, quality, and conditions. It is clear by reviewing technology preference,
23 CenturyLink’s access line decline, the share of voice connections by technology type, and

1 technology coverage in Utah that customer prefer to spend their money on mobile and
2 internet voice solutions rather than antiquated landlines.

3
4 **Q. CONSISTENT WITH § 54-8b-3(5)(c), PLEASE DESCRIBE THE MARKET**
5 **SHARE OF CENTURYLINK FOR THOSE SERVICES WHICH AN**
6 **EXEMPTION IS REQUESTED.**

7 **A.** As depicted in Exhibit 3, CenturyLink’s market share of voice services is only 3.2%
8 statewide. Mobile voice connections account for the vast majority at 79.3%. VoIP accounts
9 for 15.1%. RLEC voice connections account for 1.5% and other non-ILEC accounts for
10 .9%. Additionally, Exhibit 2 depicts the decline in market share from 2005 through 2022
11 with access lines falling by 87.8%, from 831,679 access lines in 2005 to only 102,168
12 access lines in 2022.

13
14 **Q. CONSISTENT WITH § 54-8b-3(5)(d), PLEASE DESCRIBE THE EXTENT OF**
15 **ECONOMIC OR REGULATORY BARRIERS TO ENTRY.**

16 **A.** By virtue of CenturyLink having lost a significant market share of access lines as depicted
17 in Exhibit 2, it is clear that customers are choosing competing services, and thus there is
18 no significant barrier to entry for competition. That is, the fact that this competition exists
19 signals that there are no barriers to entry. Additionally, with the implementation of BEAD
20 funding and Utah’s Digital Connectivity Plan, it is clear that entry into the
21 telecommunication market moving forward must be focused on broadband deployment
22 rather than landline voice service.

1 Q. **CONSISTENT WITH § 54-8b-3(5)(f), PLEASE DESCRIBE THE EXEMPTION**
2 **THAT IS REQUESTED.**

3 A. CenturyLink is seeking statewide exemption from carrier of last relief obligations. As
4 depicted in Exhibits 1 through 6 consumers have found the competitive alternatives
5 compelling and have voted with their wallets.

6

7 **IV. PUBLIC INTEREST**

8 Q. **CONSISTENT WITH § 54-8b-3(6), PLEASE DESCRIBE THE IMPACT THE**
9 **REQUESTED EXEMPTION WOULD HAVE ON CAPTIVE CUSTOMERS.**

10 A. This petition is not a request for discontinuance to any existing customers, and thus
11 there is no impact on “captive customers.” Anyone who is “captive” can continue
12 using their service. Additionally, given the availability and reliability of alternative
13 telecommunication services like satellite that can provide service at any location in
14 Utah, the concept of “captive” customers is outdated and no longer relevant.

15

16 Q. **WOULD THE PUBLIC INTEREST BE SERVED BY GRANTING**
17 **CENTURYLINK RELIEF FROM ITS CURRENT CARRIER OF LAST RESORT**
18 **OBLICATIONS?**

19 A. Yes. This petition is about improving and modernizing the telecommunication industry. In
20 Utah, CenturyLink no longer receives state or federal universal service support in these
21 high-cost areas. CenturyLink cannot modernize if it is required to fund antiquated modes
22 of service that the majority of Utah citizens no longer want or use. New customers entering
23 the market are not purchasing landline service; instead, the public interest is advanced by

1 expanding broadband infrastructure. As illustrated in the exhibits, use of landline voice
2 services has naturally declined with the rise of more useful, advanced technologies. As
3 Utah works toward a goal of broadband equity, access, and deployment, relief from COLR
4 obligations allows CenturyLink to devote greater resources to expanding high-speed
5 internet to connect all Americans and ensure that unserved populations gain access to the
6 global digital community.

8 **IV. CONCLUSION**

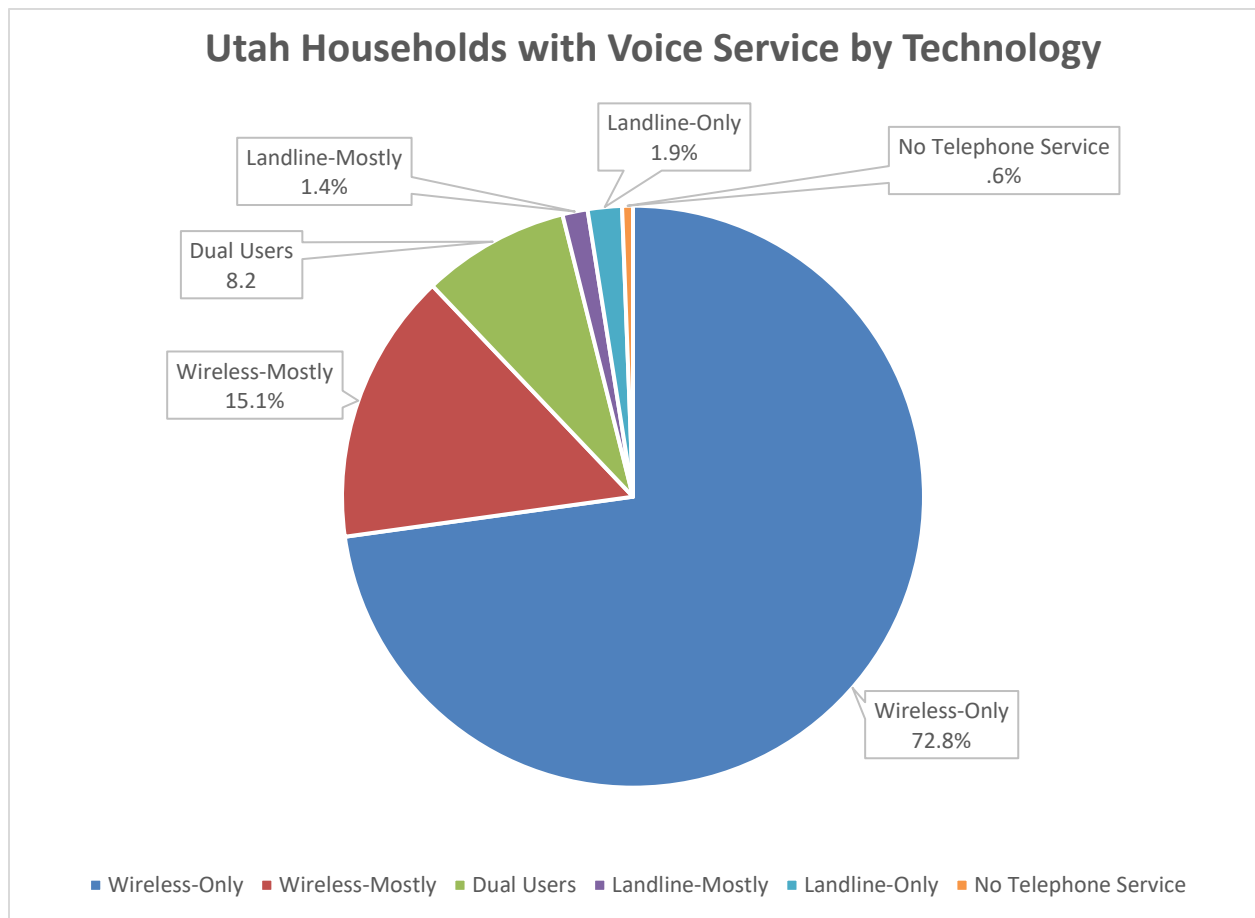
9 **Q. WHAT IS YOUR CONCLUSION OF THE DATA PRESENTED?**

10 **A.** My conclusion is that CenturyLink is subject to effective competition in Utah, and
11 exempting CenturyLink from carrier of last resort obligations is in the public interest.

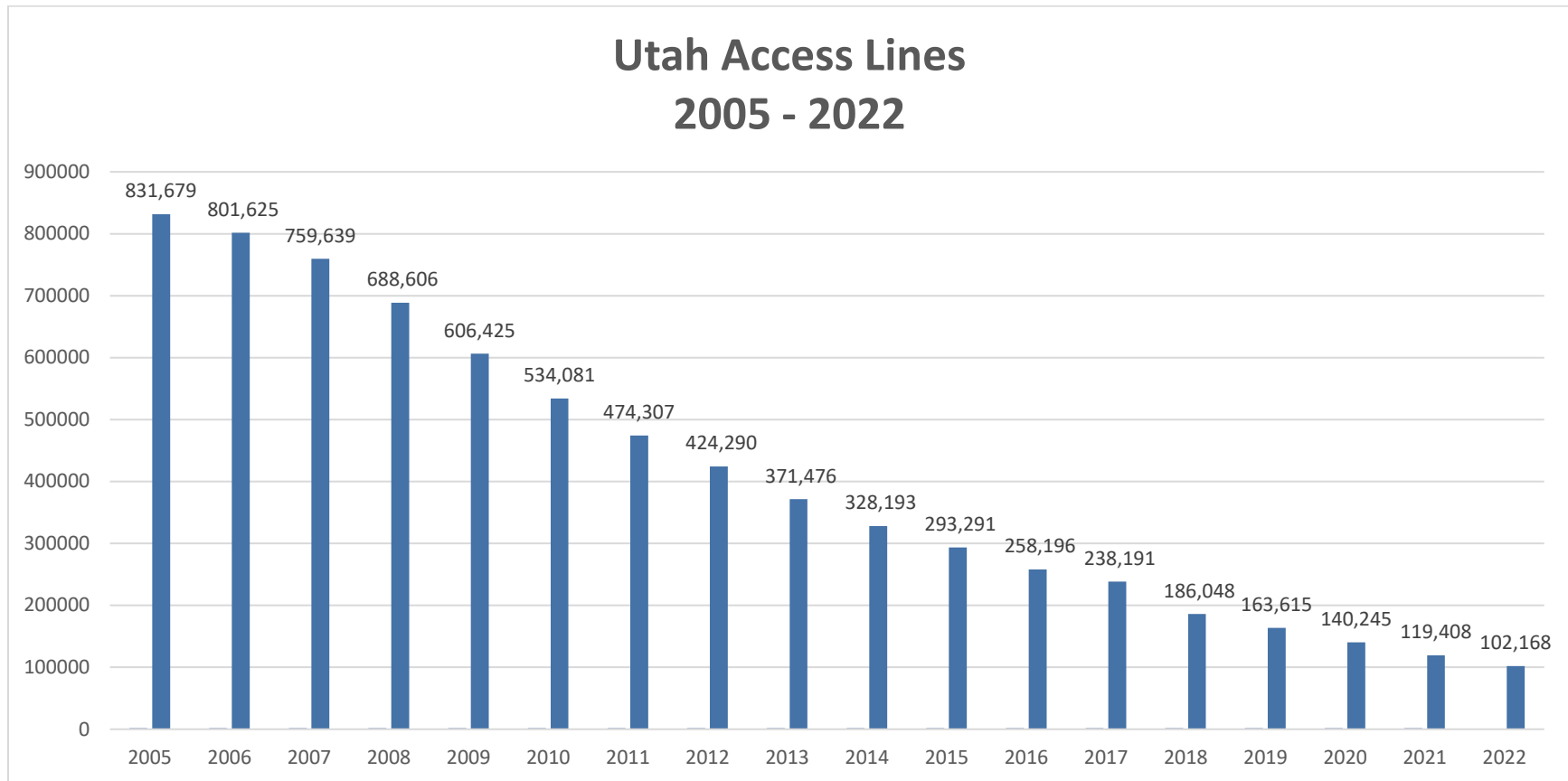
12
13 **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

14 **A.** Yes, it does.
15

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

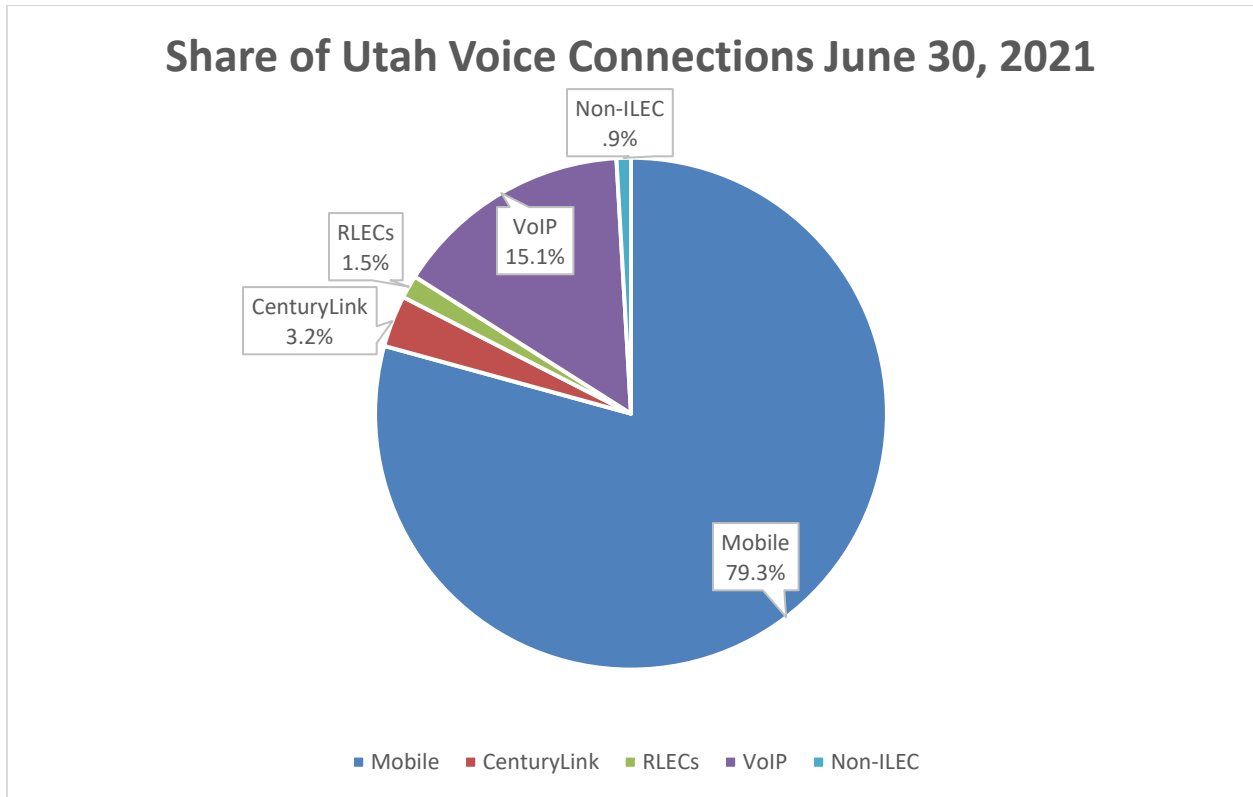


Source: Centers for Disease Control and Prevention, National Center for Health Statistics, National Health Interview Survey Early Release Program
https://www.cdc.gov/nchs/data/nhis/earlyrelease/Wireless_state_202212.pdf



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%

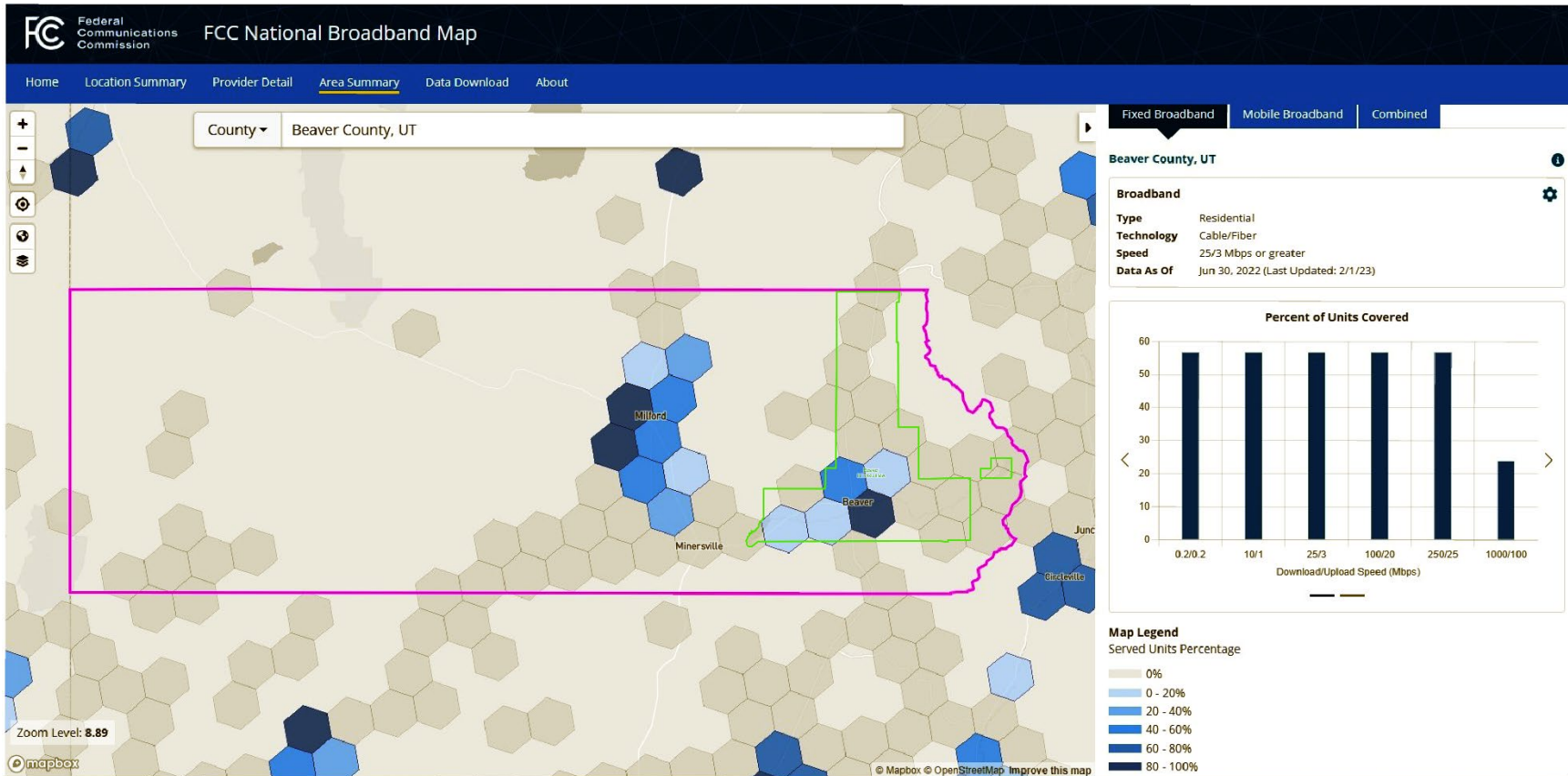
Source: FCC National Broadband Map

CenturyLink Utah Wire Center By County

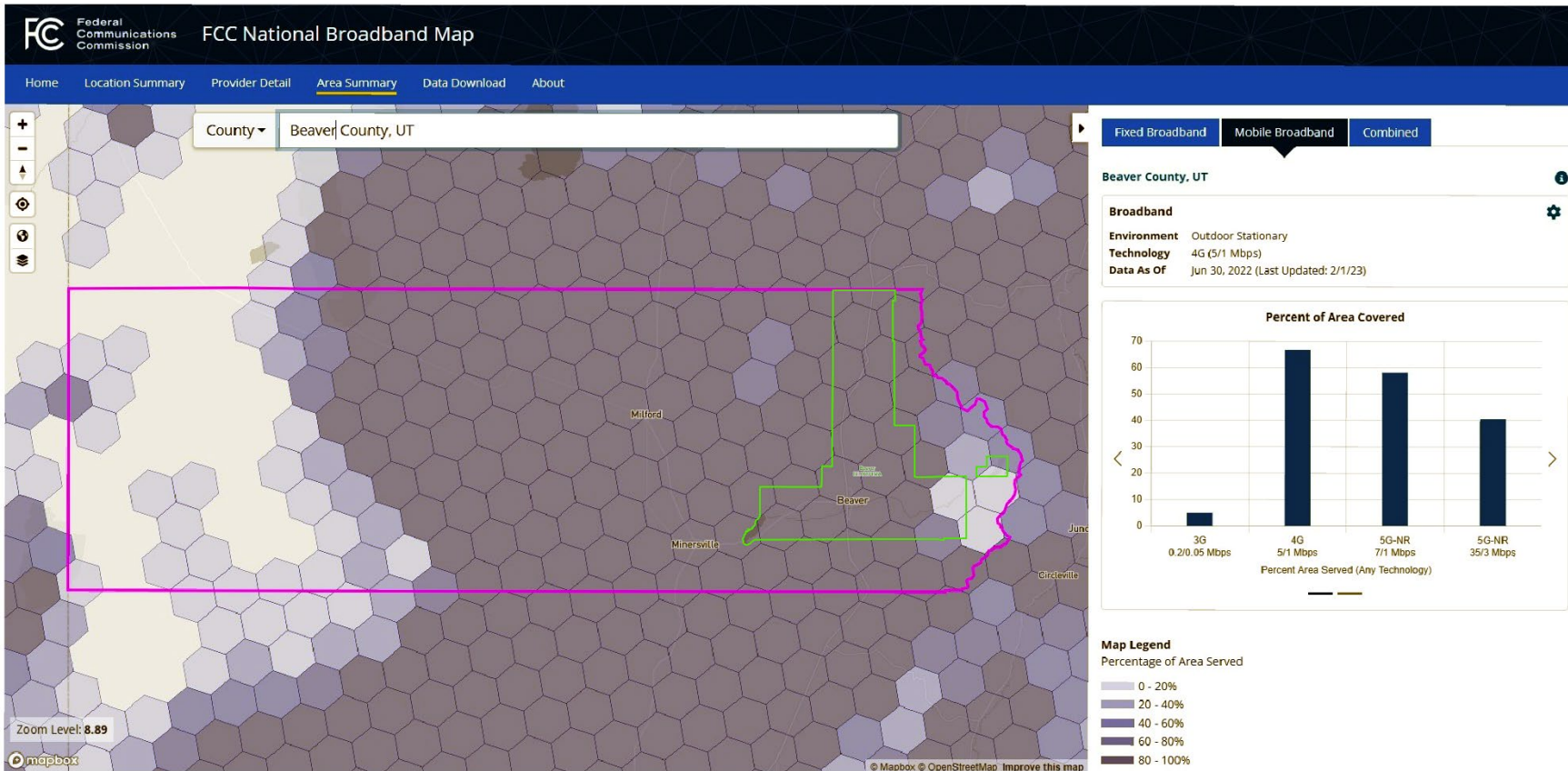
CLLI	WIRE CENTER	COUNTY	% COVERAGE ALL WIRED, FIXED WIRELESS (LICENSED) (25/3)	% COVERAGE ALL WIRED (25/3)	% COVERAGE CABLE / FIBER (25/3)	% COVERAGE FIXED WIRELESS (LICENSED) (25/3)	% COVERAGE MOBILE (5/1)
OGDNUTWE	Ogden West	Weber	95.93%	93.94%	93.03%	49.96%	73.99%
OREMUTMA	Orem	Utah	97.92%	94.75%	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

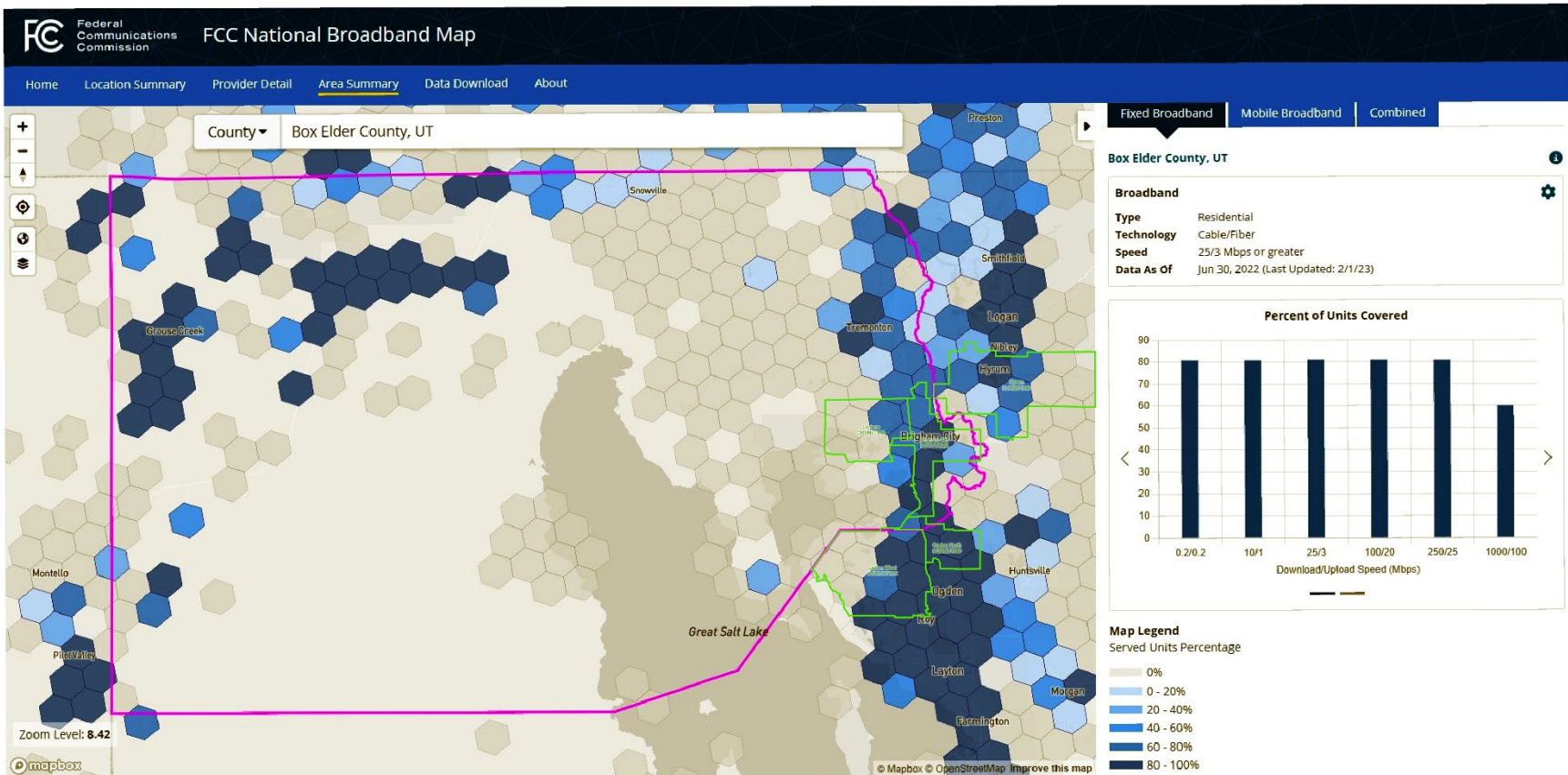
Beaver County Cable / Fiber



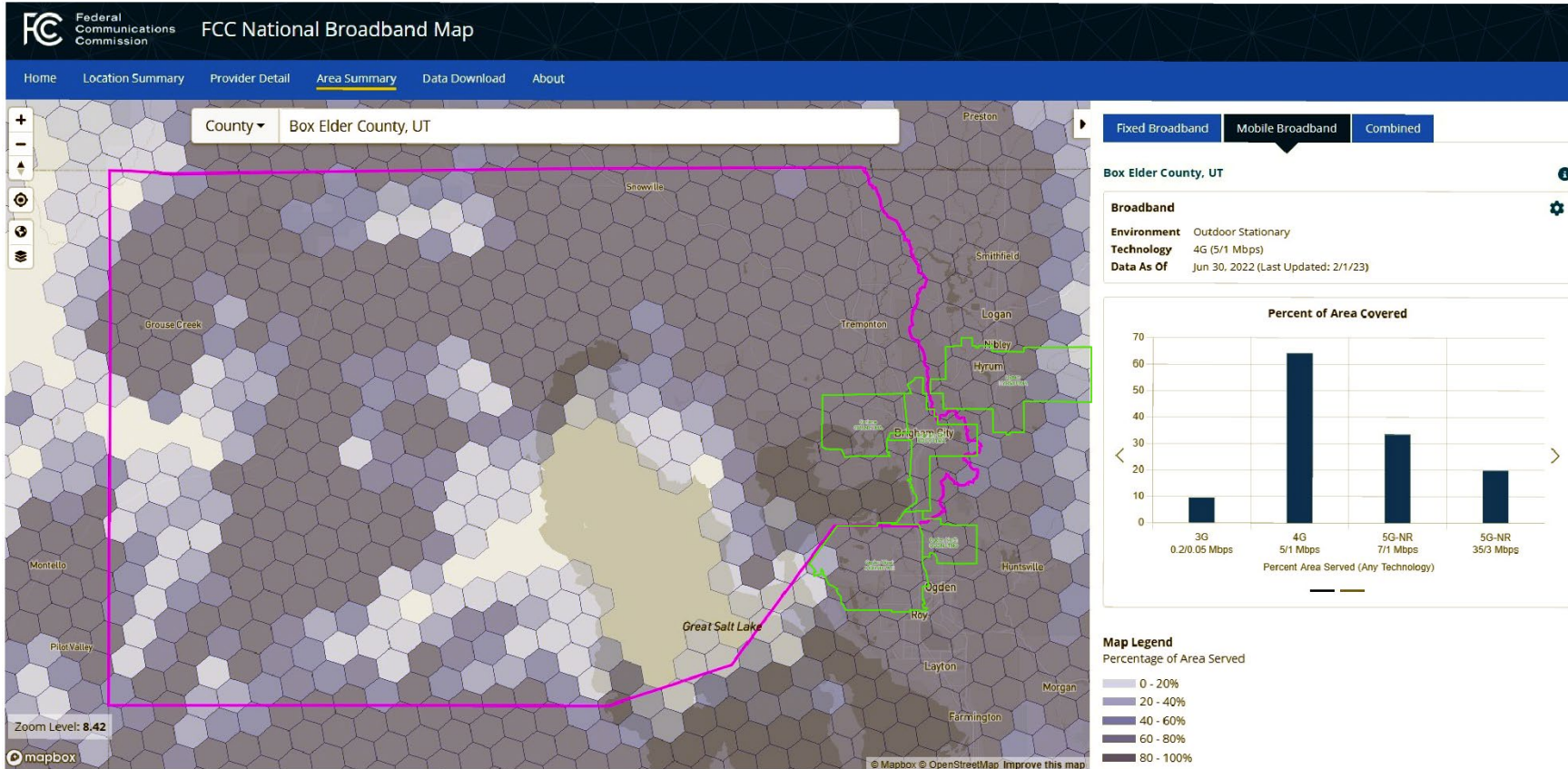
Beaver County Mobile



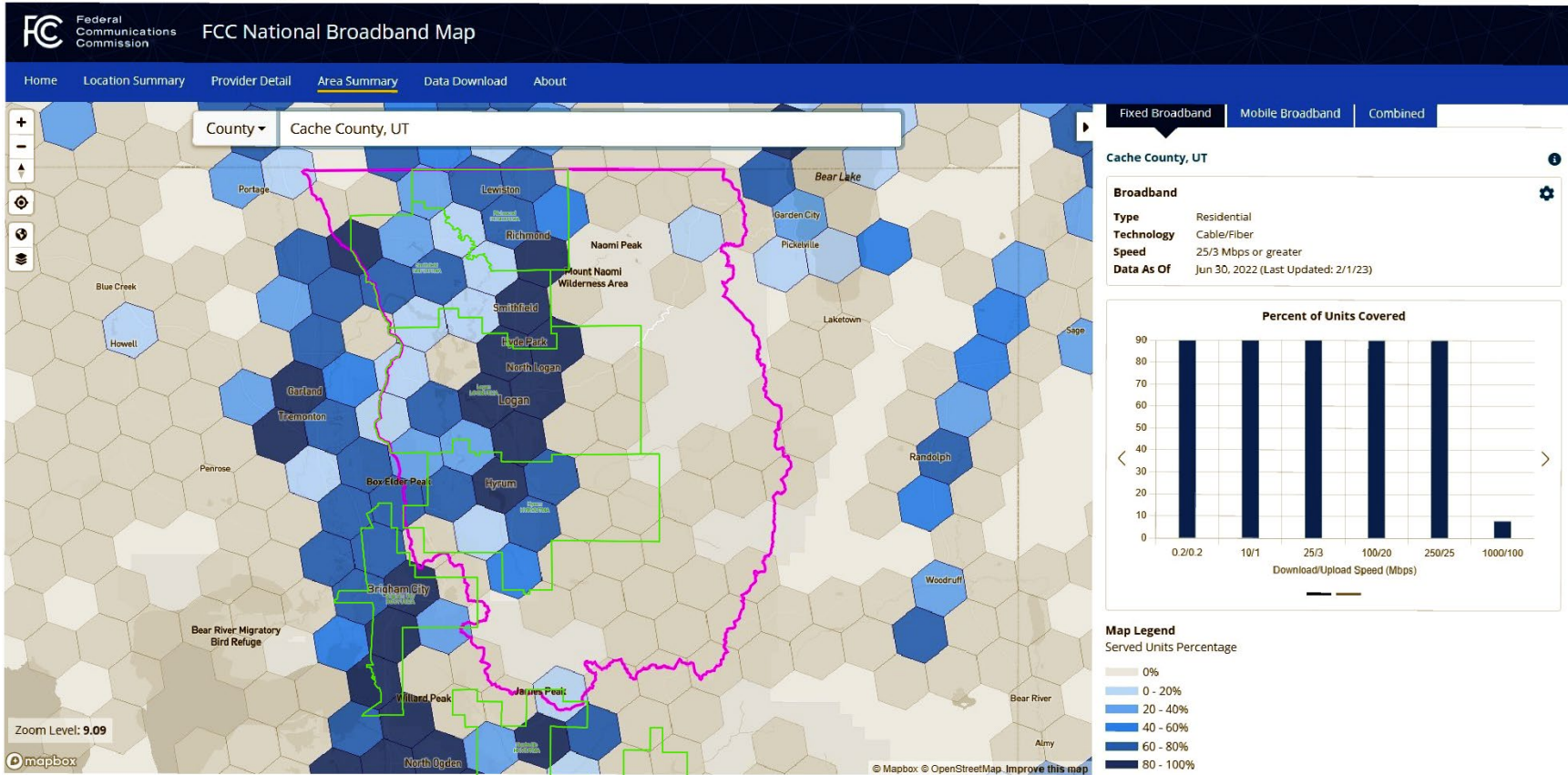
Box Elder County Cable / Fiber



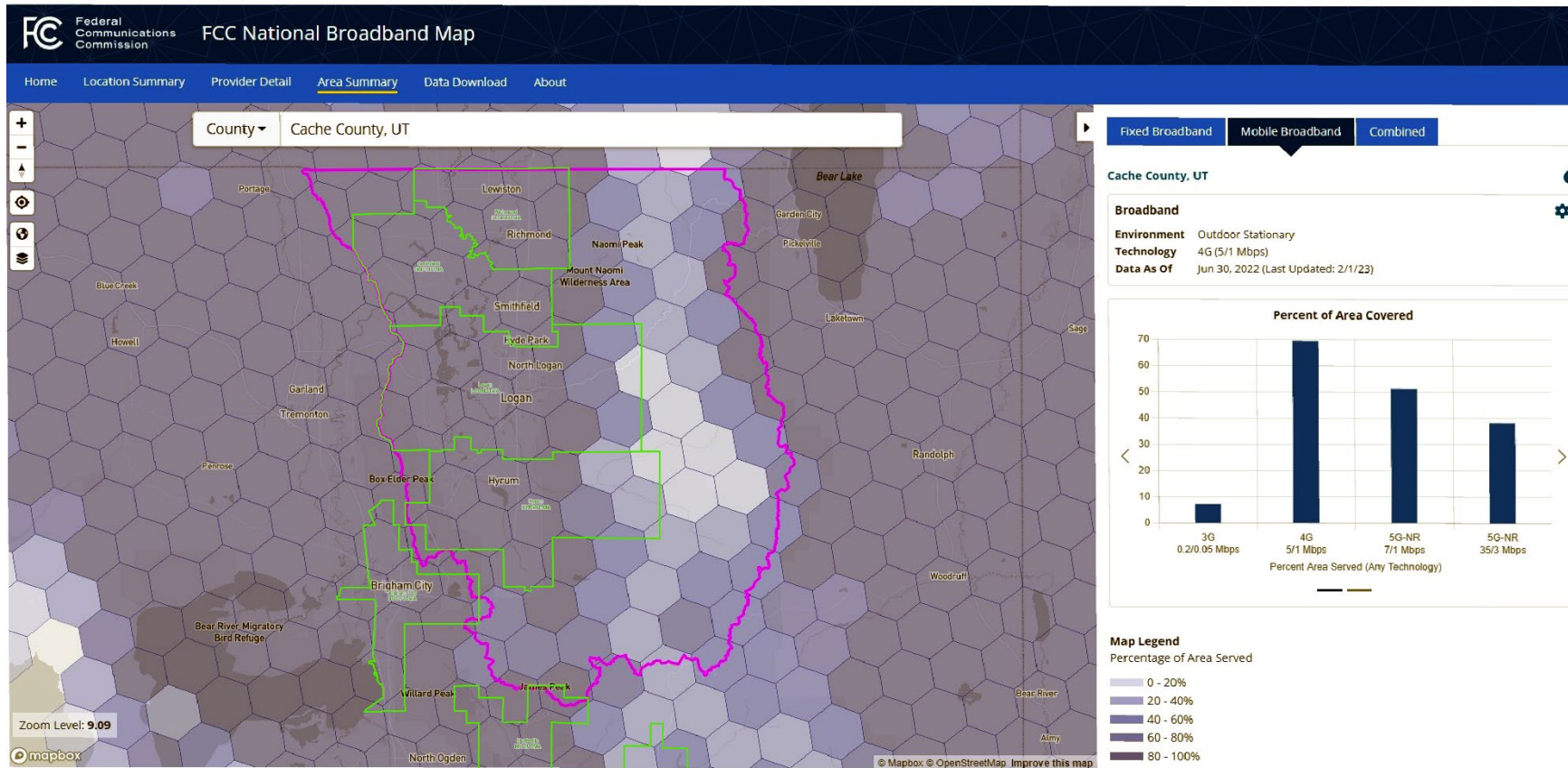
Box Elder County Mobile



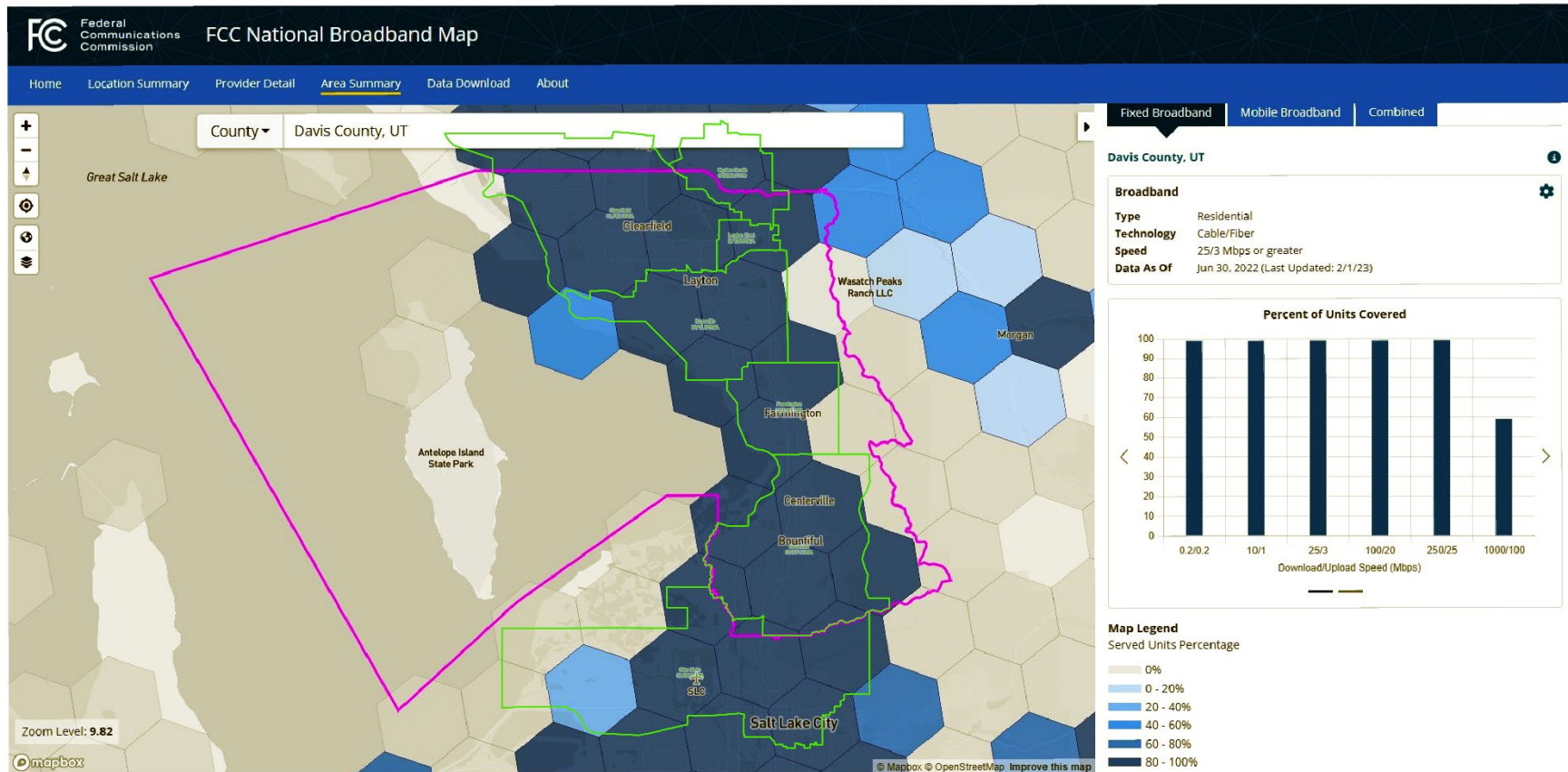
Cache County Cable / Fiber



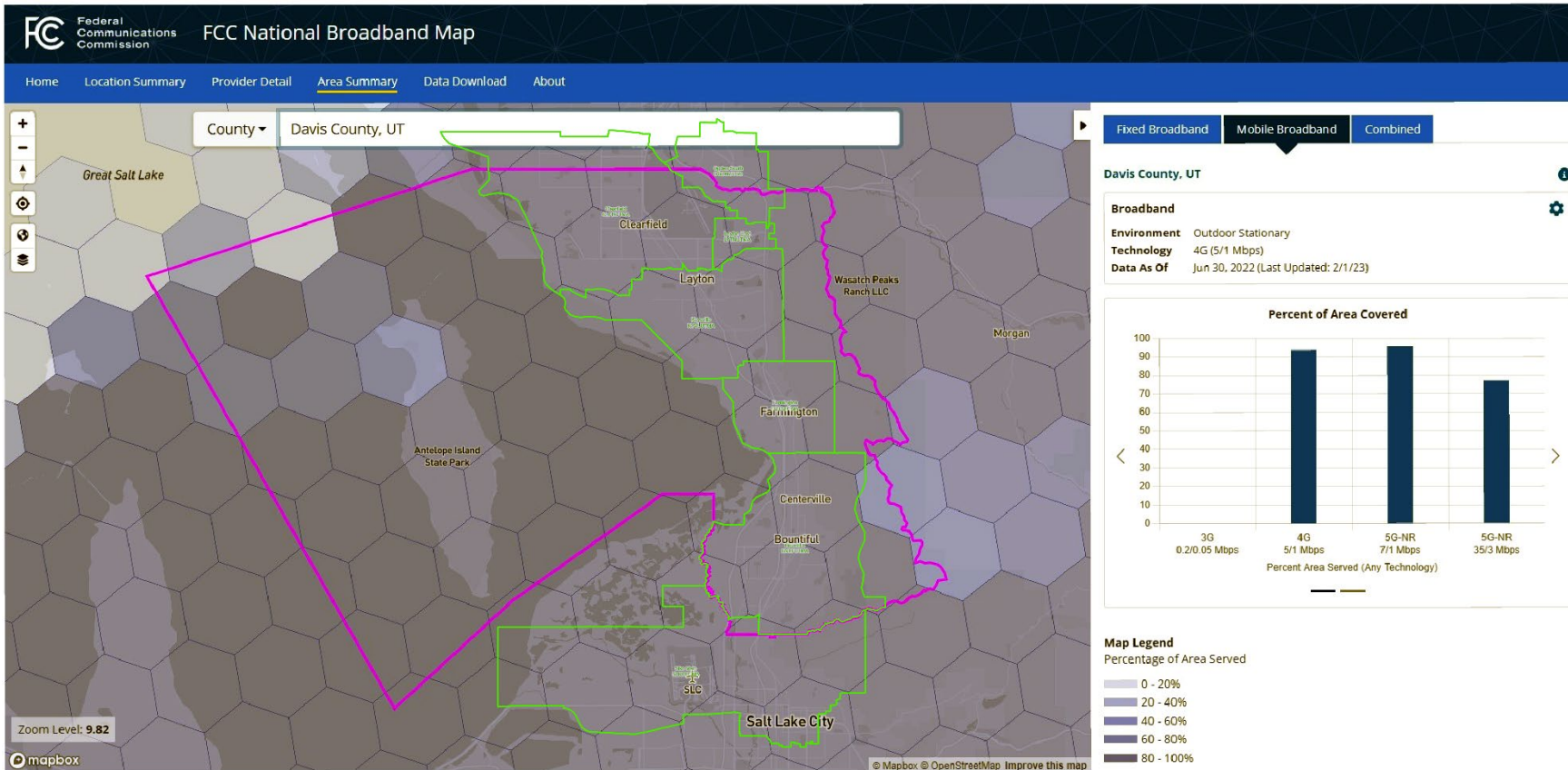
Cache County Mobile



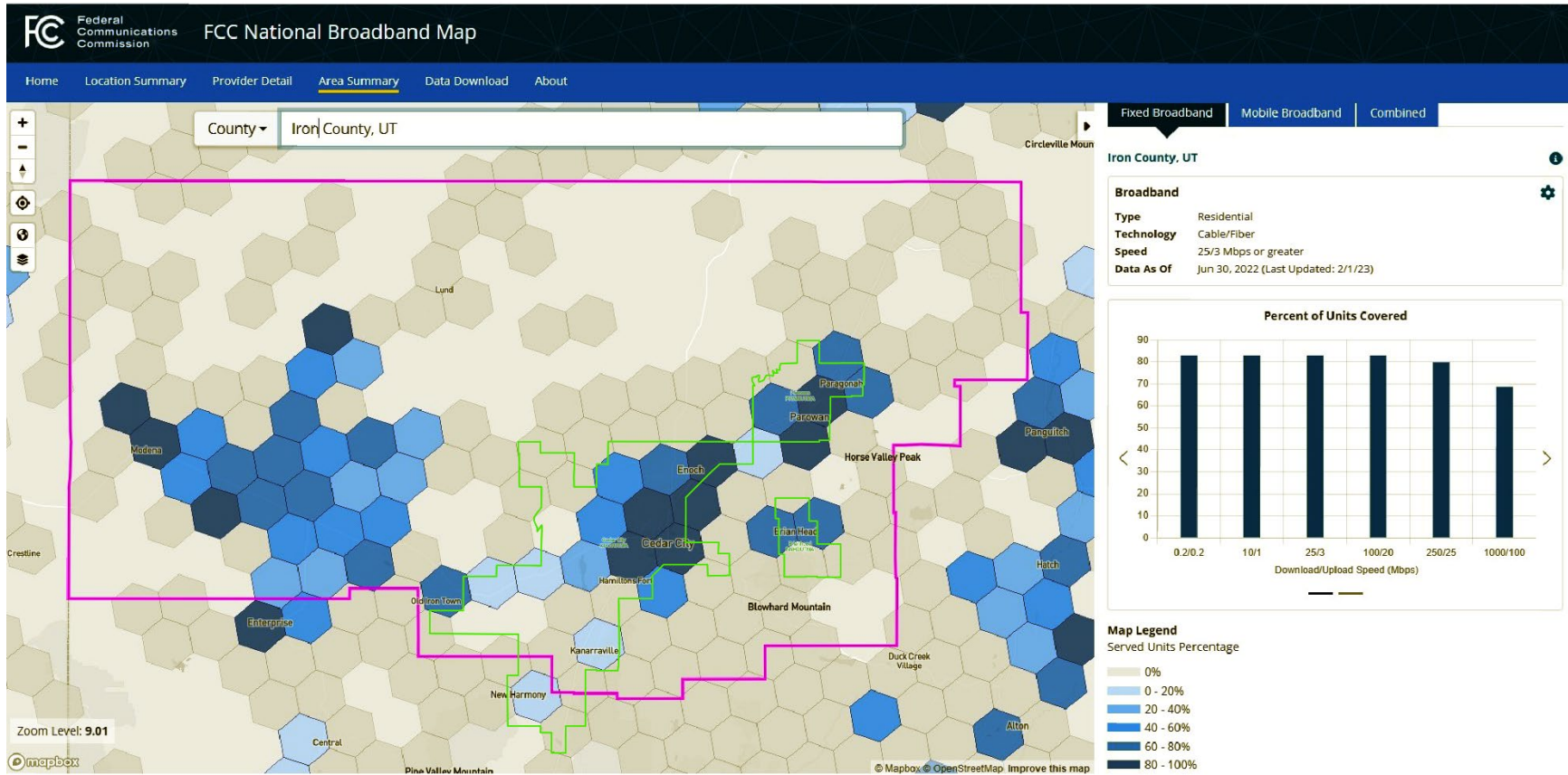
Davis County Cable / Fiber



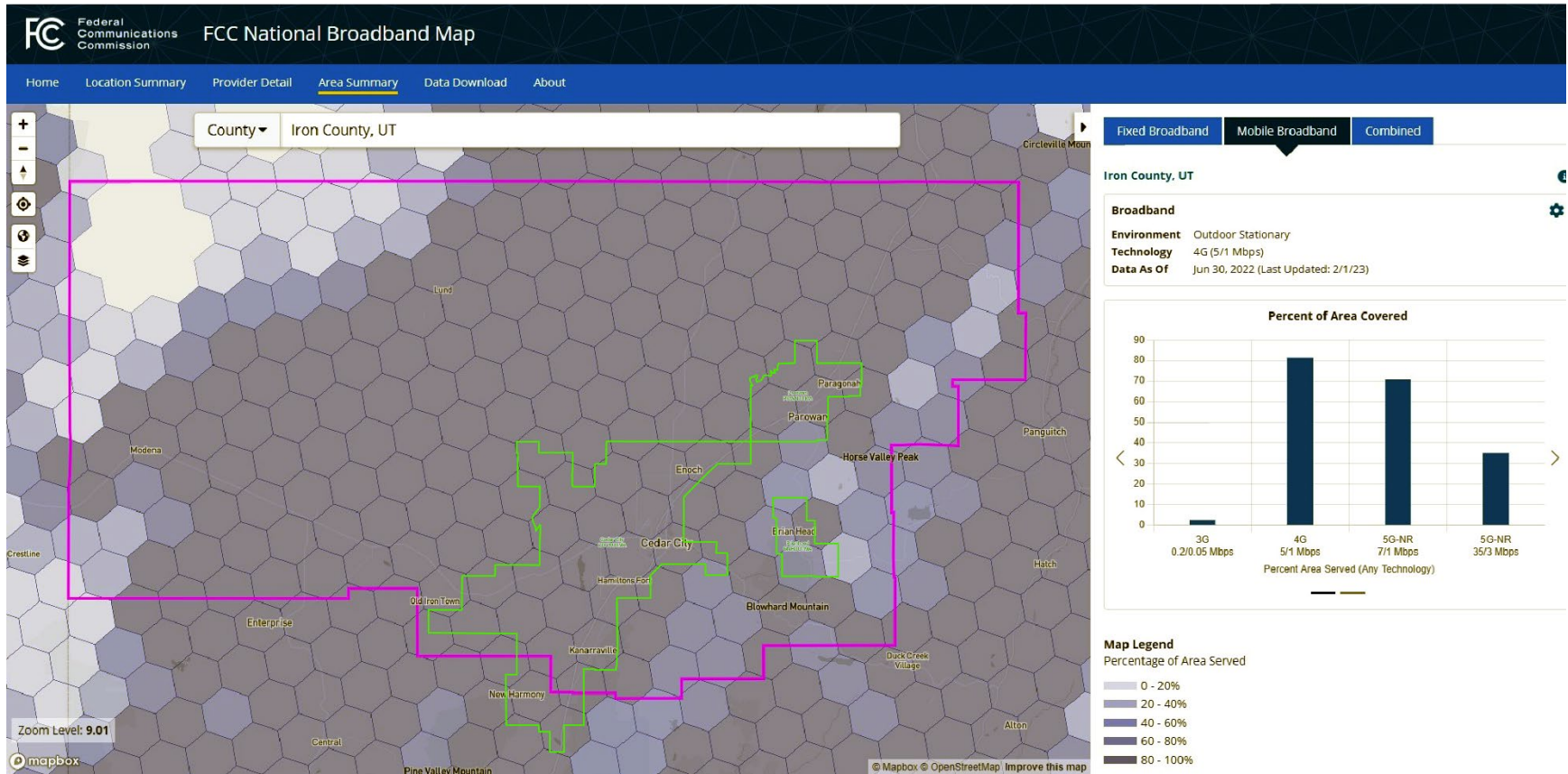
Davis County Mobile



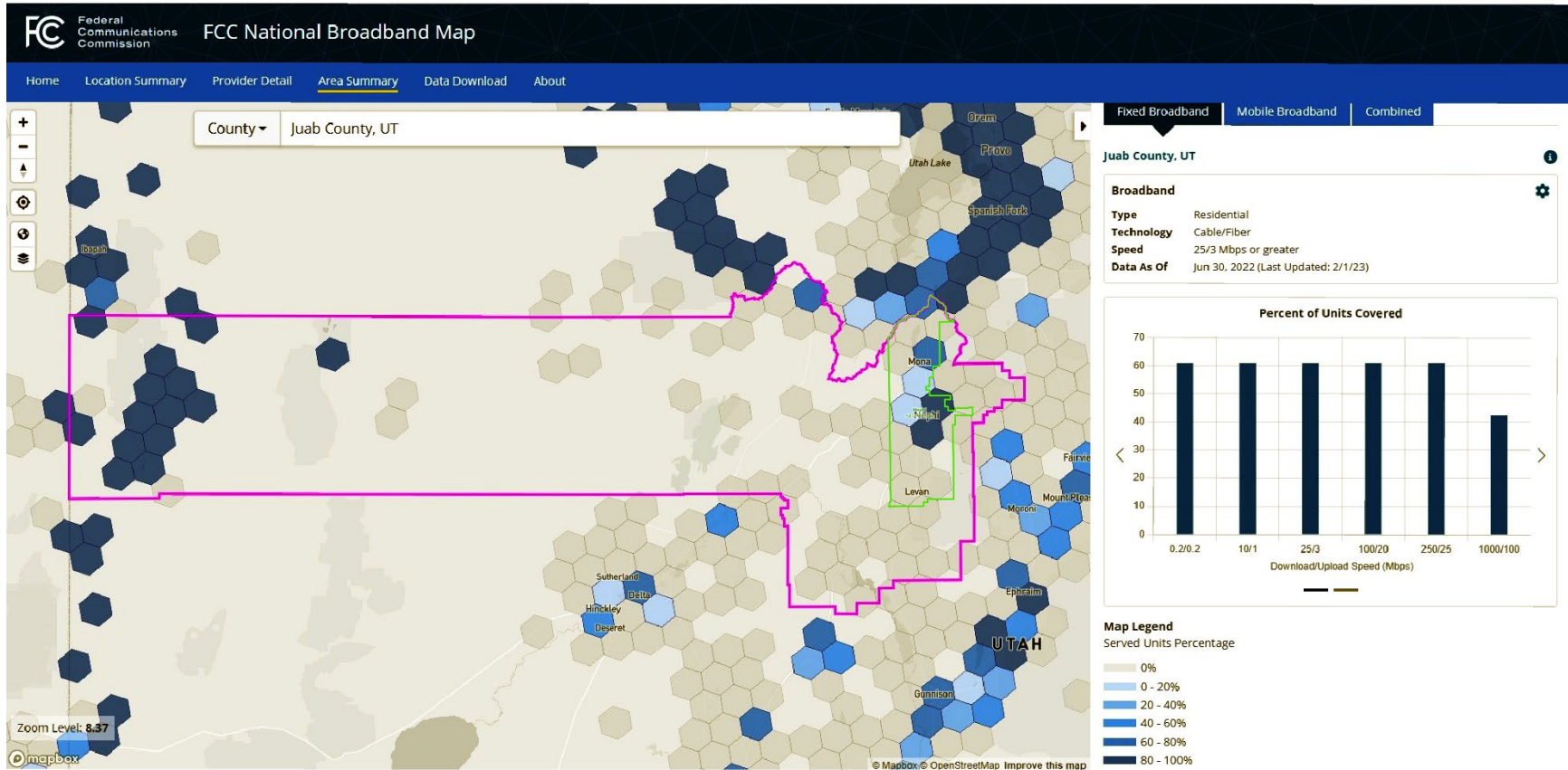
Iron County Cable / Fiber



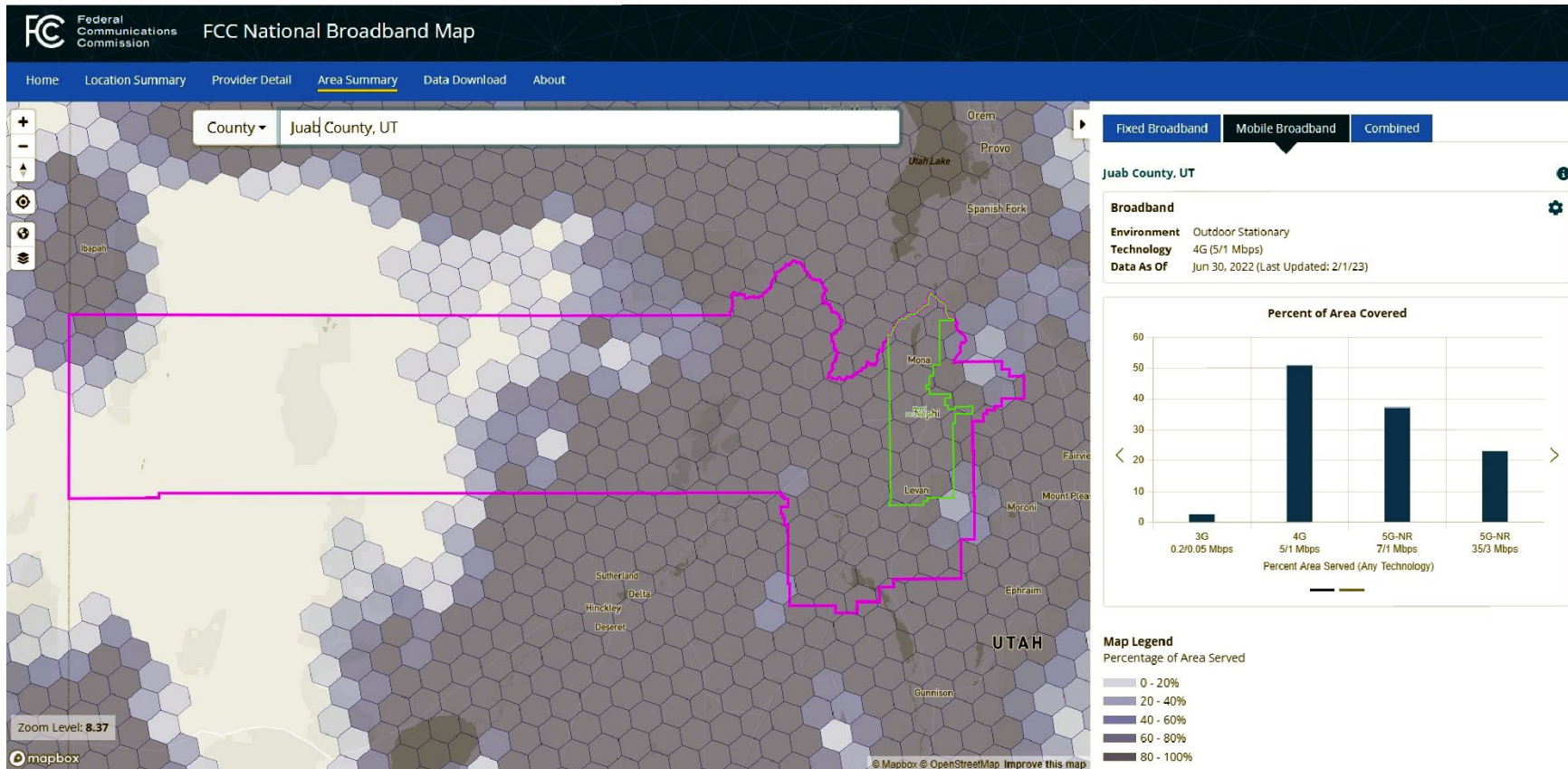
Iron County Mobile



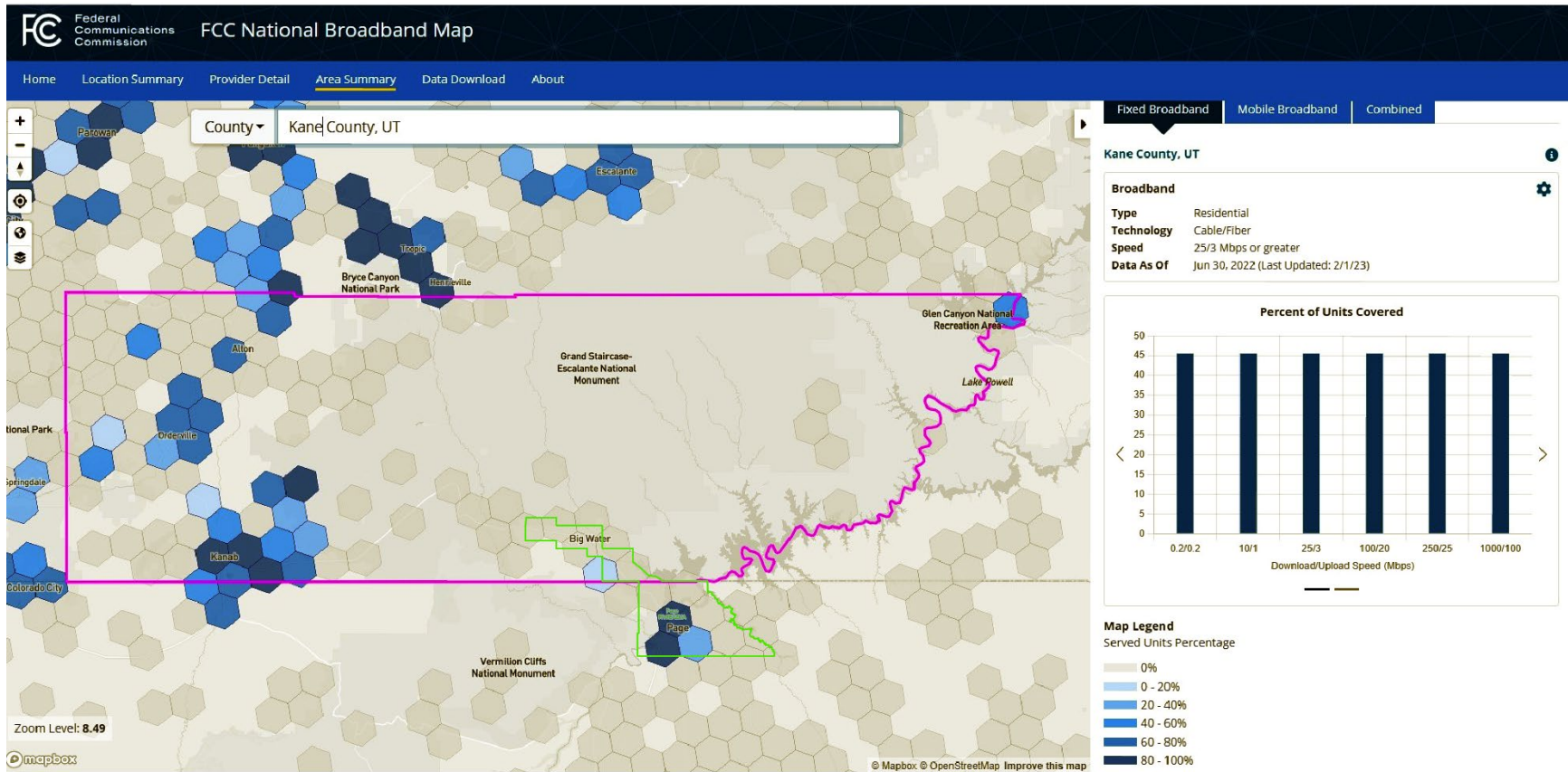
Juab County Cable / Fiber



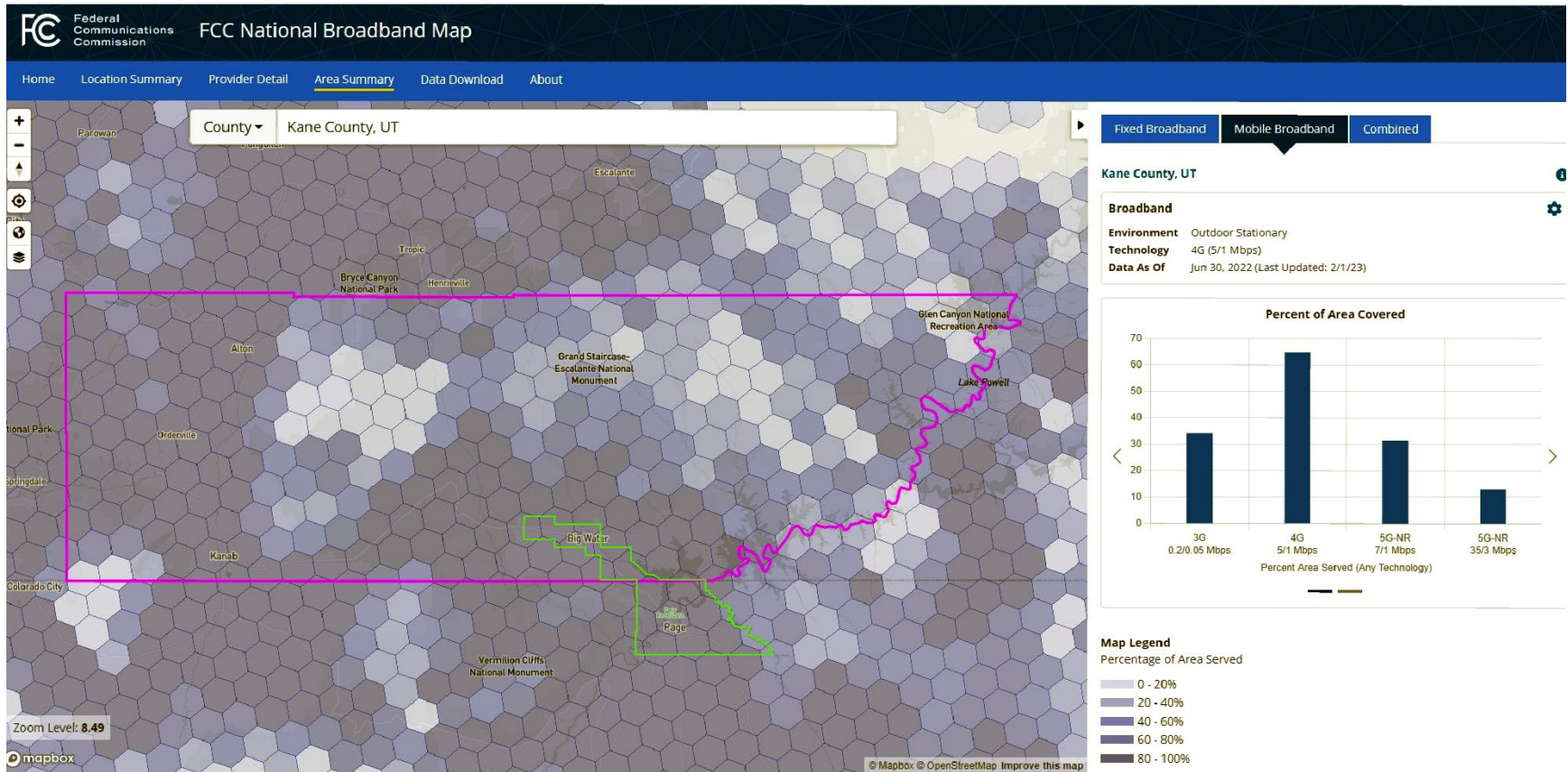
Juab County Mobile



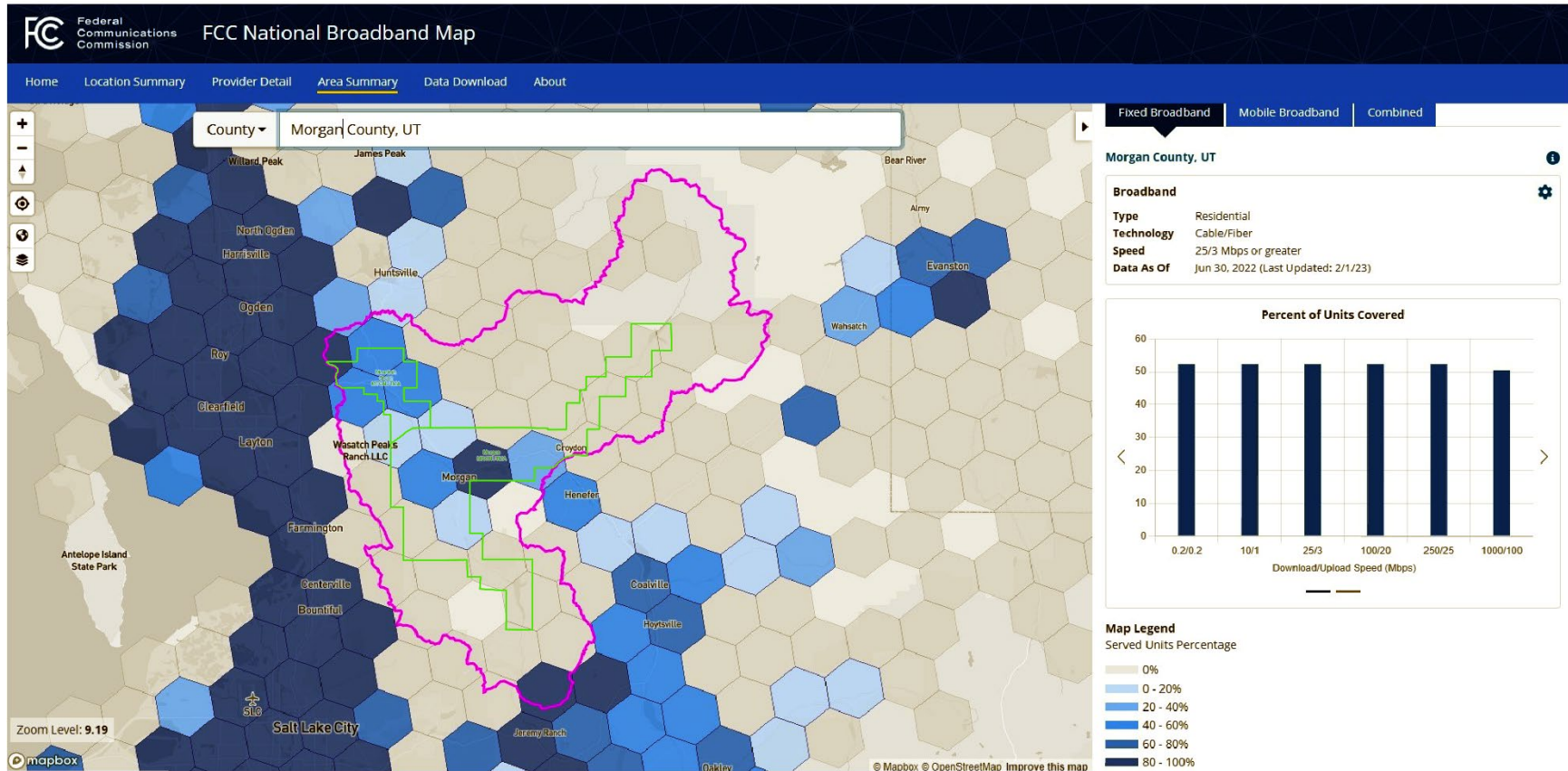
Kane County Cable / Fiber



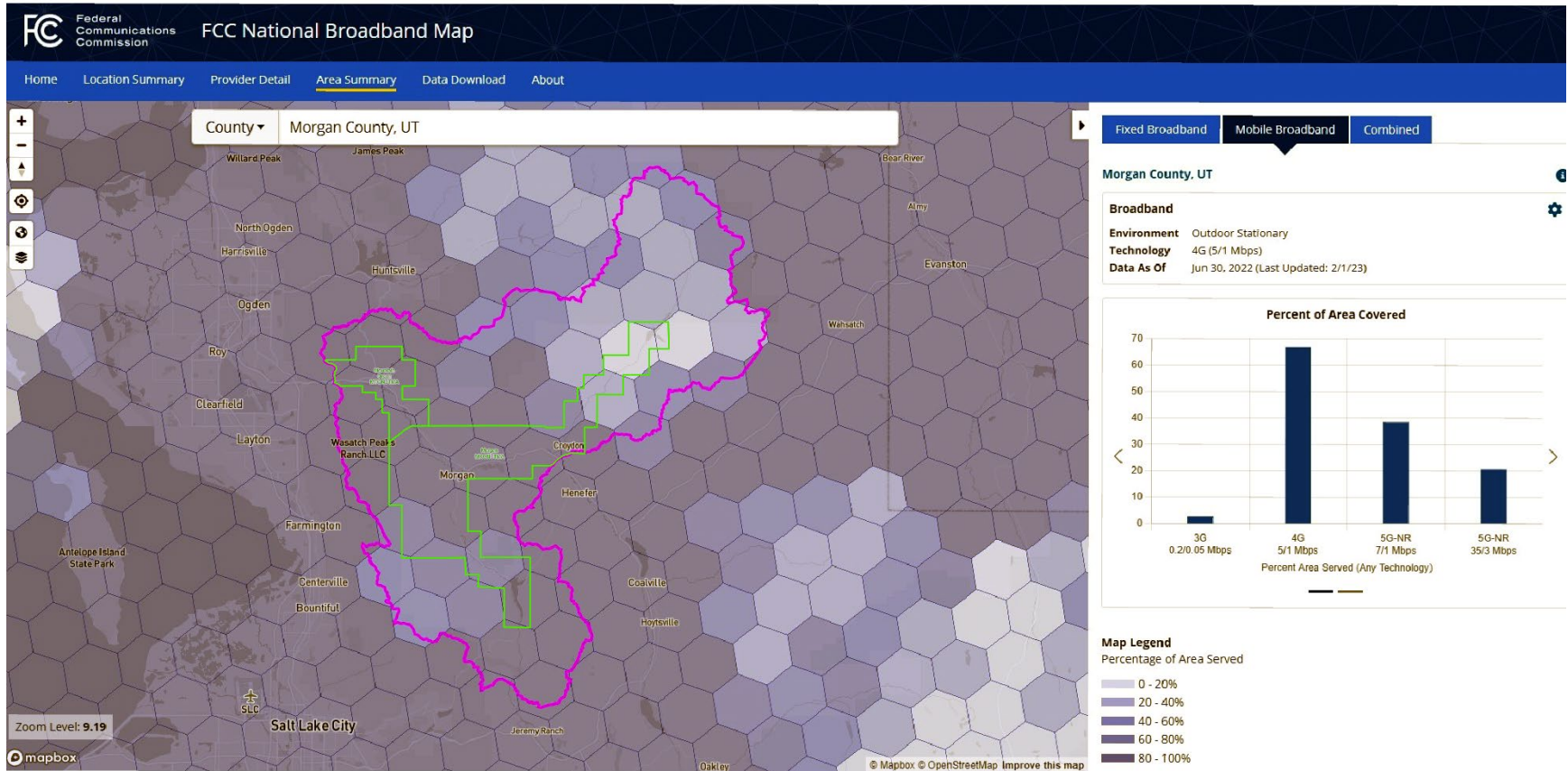
Kane County Mobile



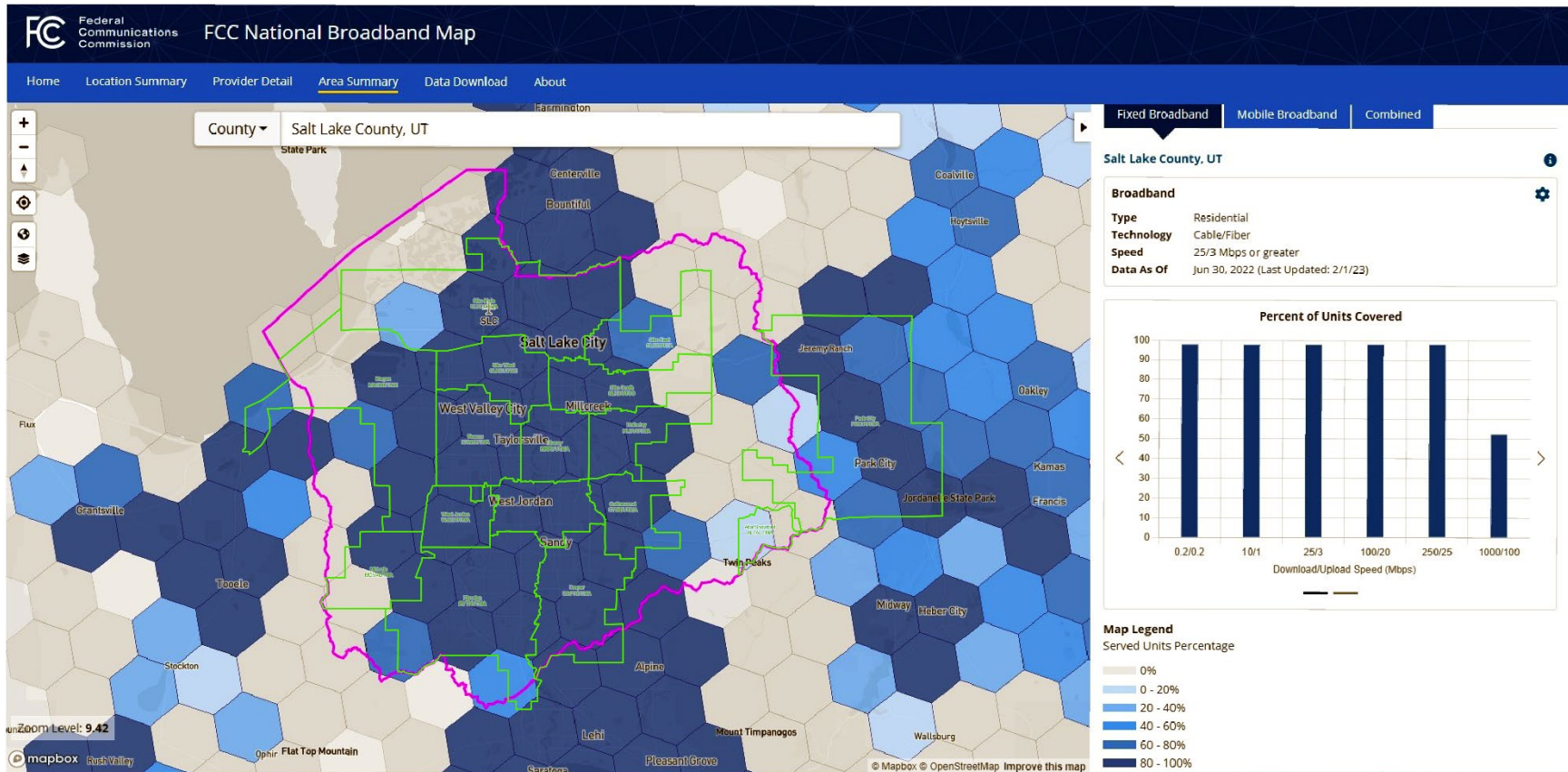
Morgan County Cable / Fiber



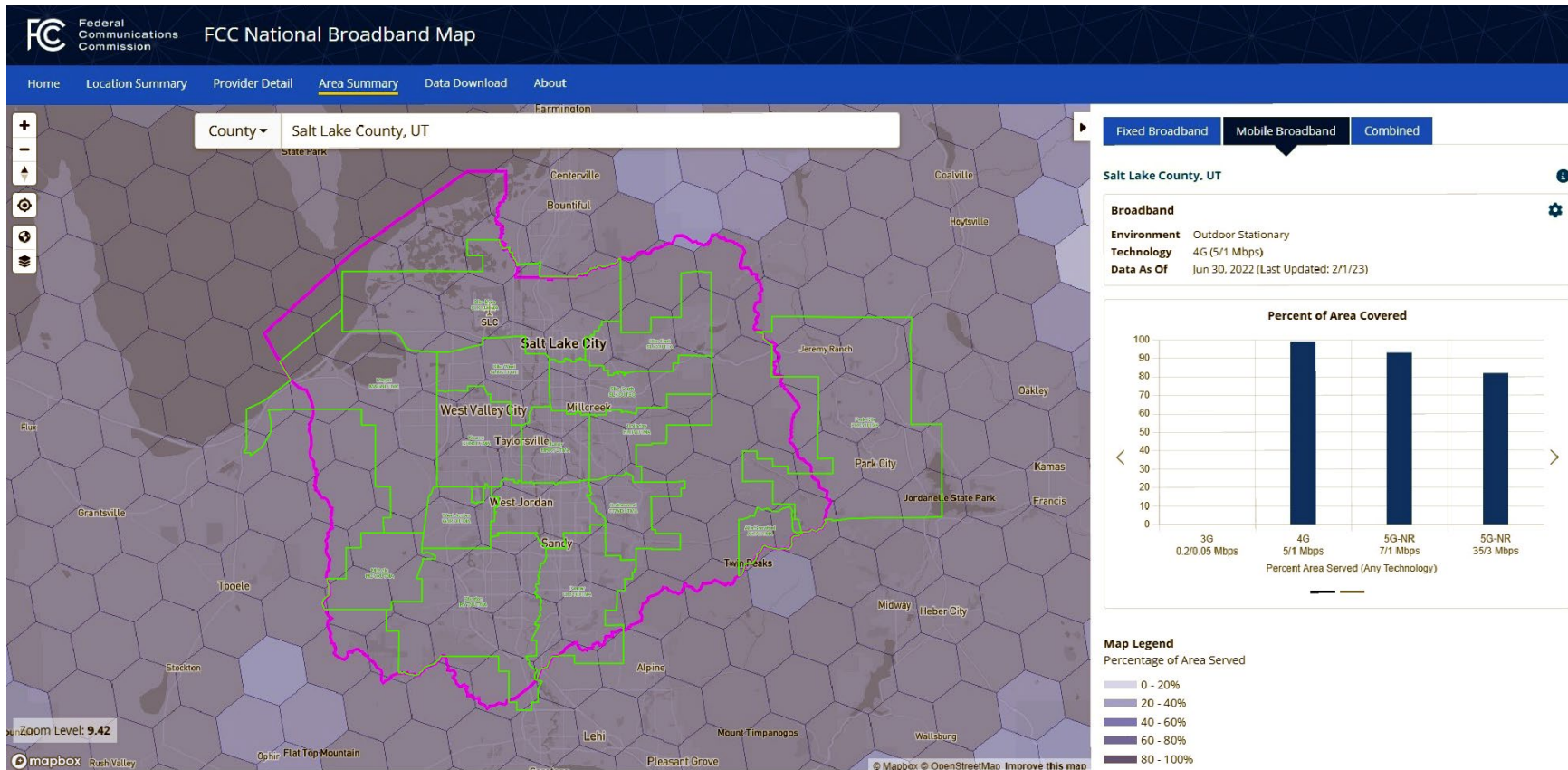
Morgan County Mobile



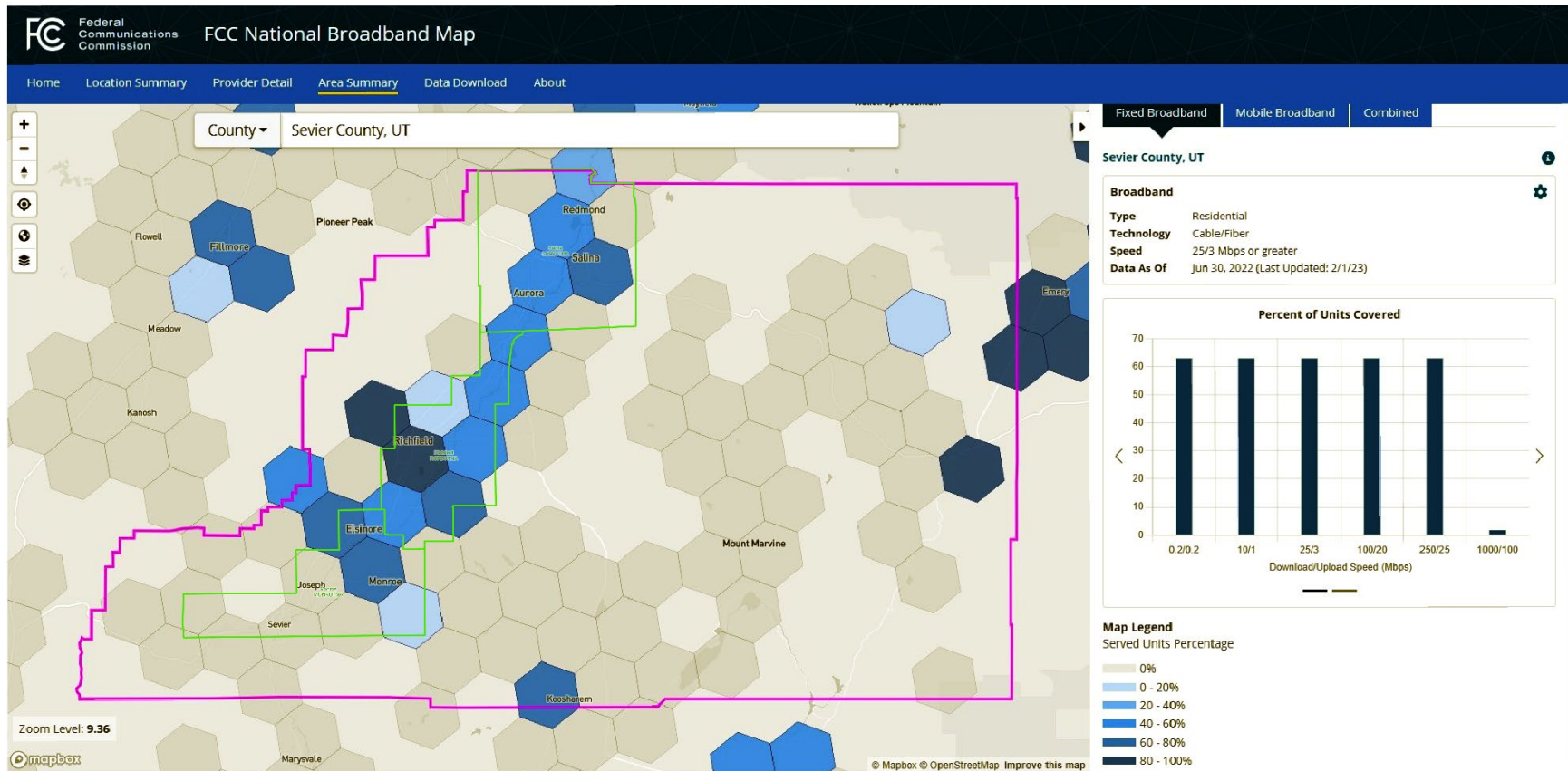
Salt Lake County Cable / Fiber



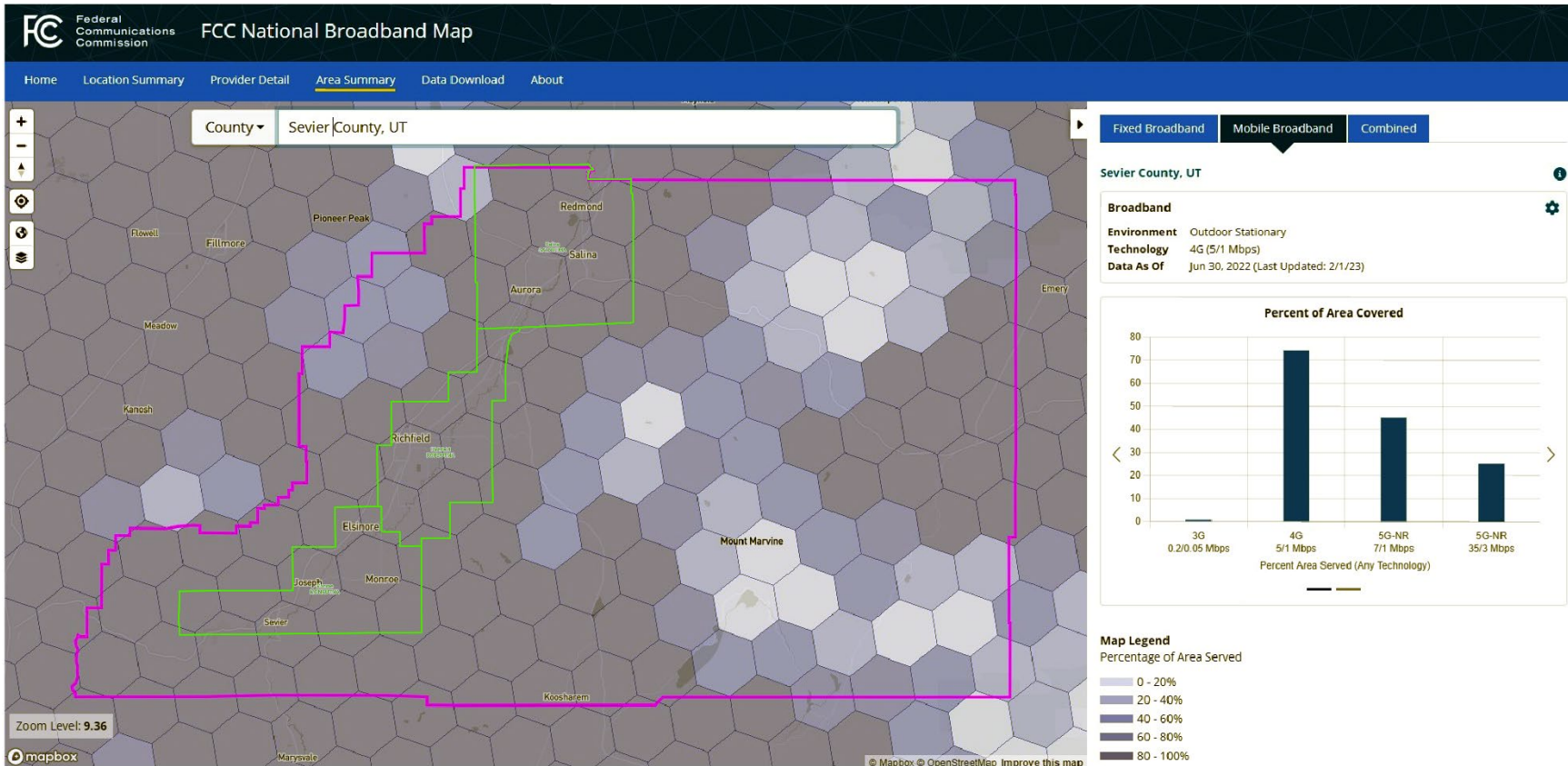
Salt Lake County Mobile



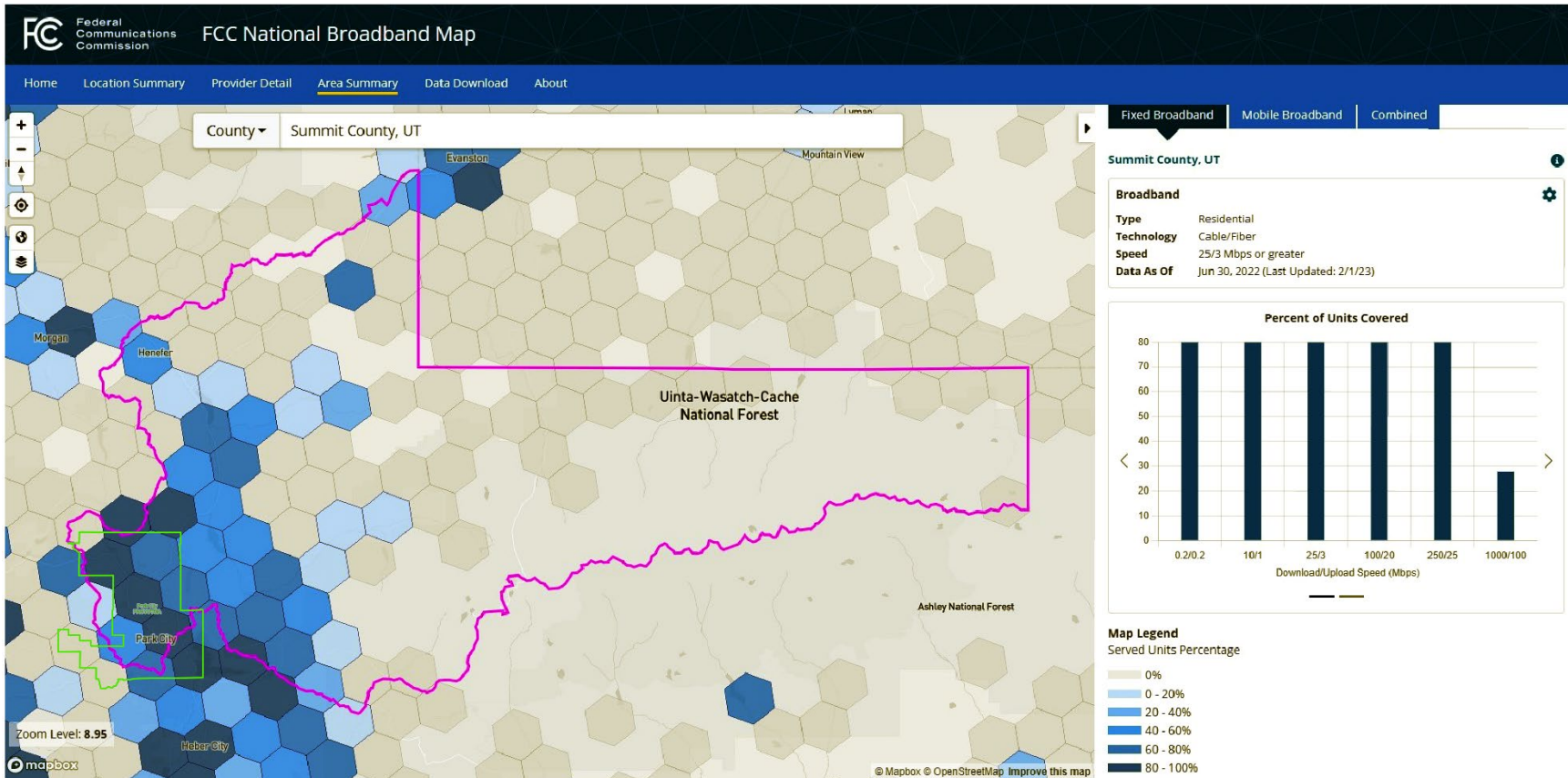
Sevier County Cable / Fiber



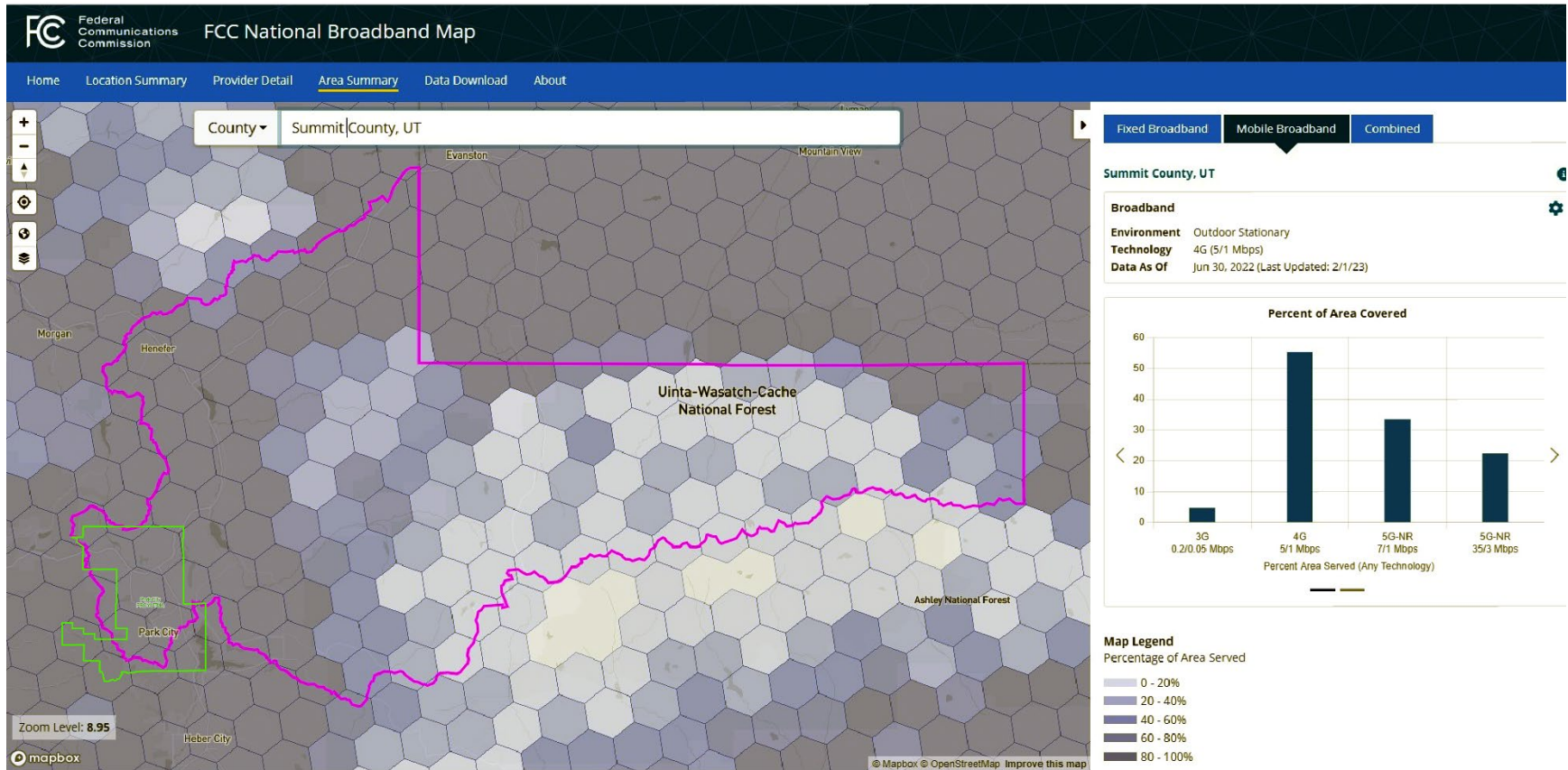
Sevier County Mobile



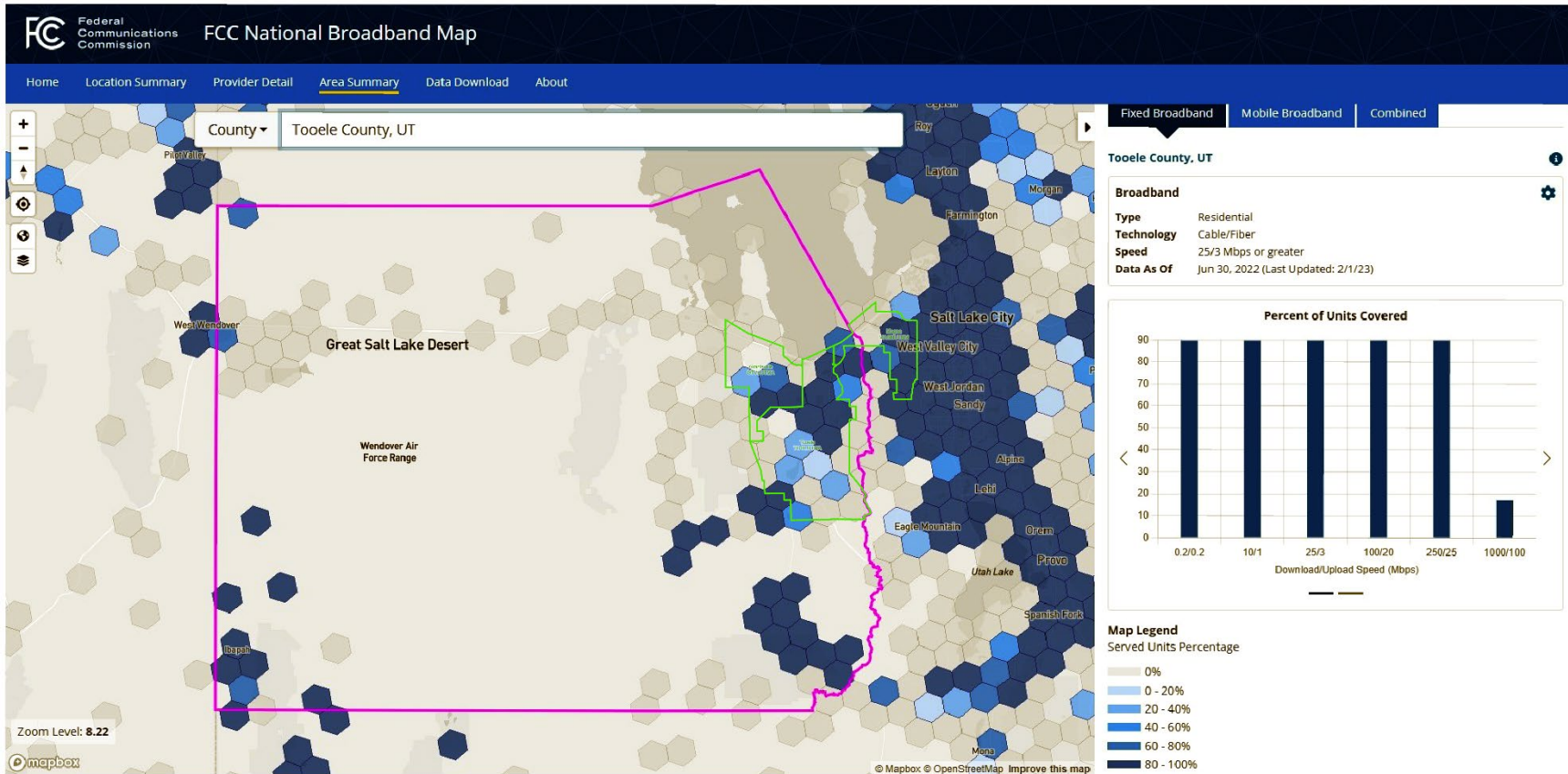
Summit County Cable / Fiber



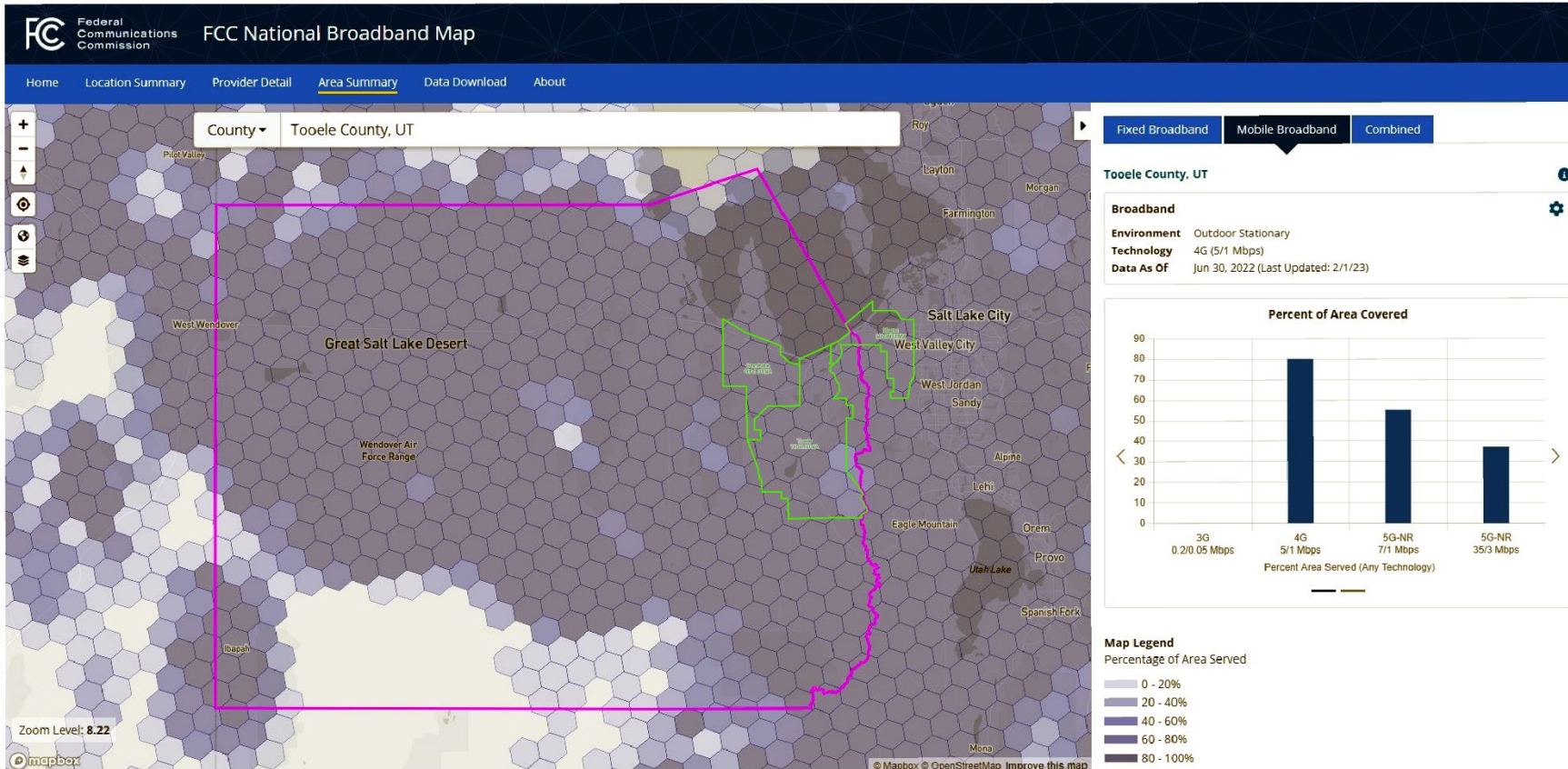
Summit County Mobile



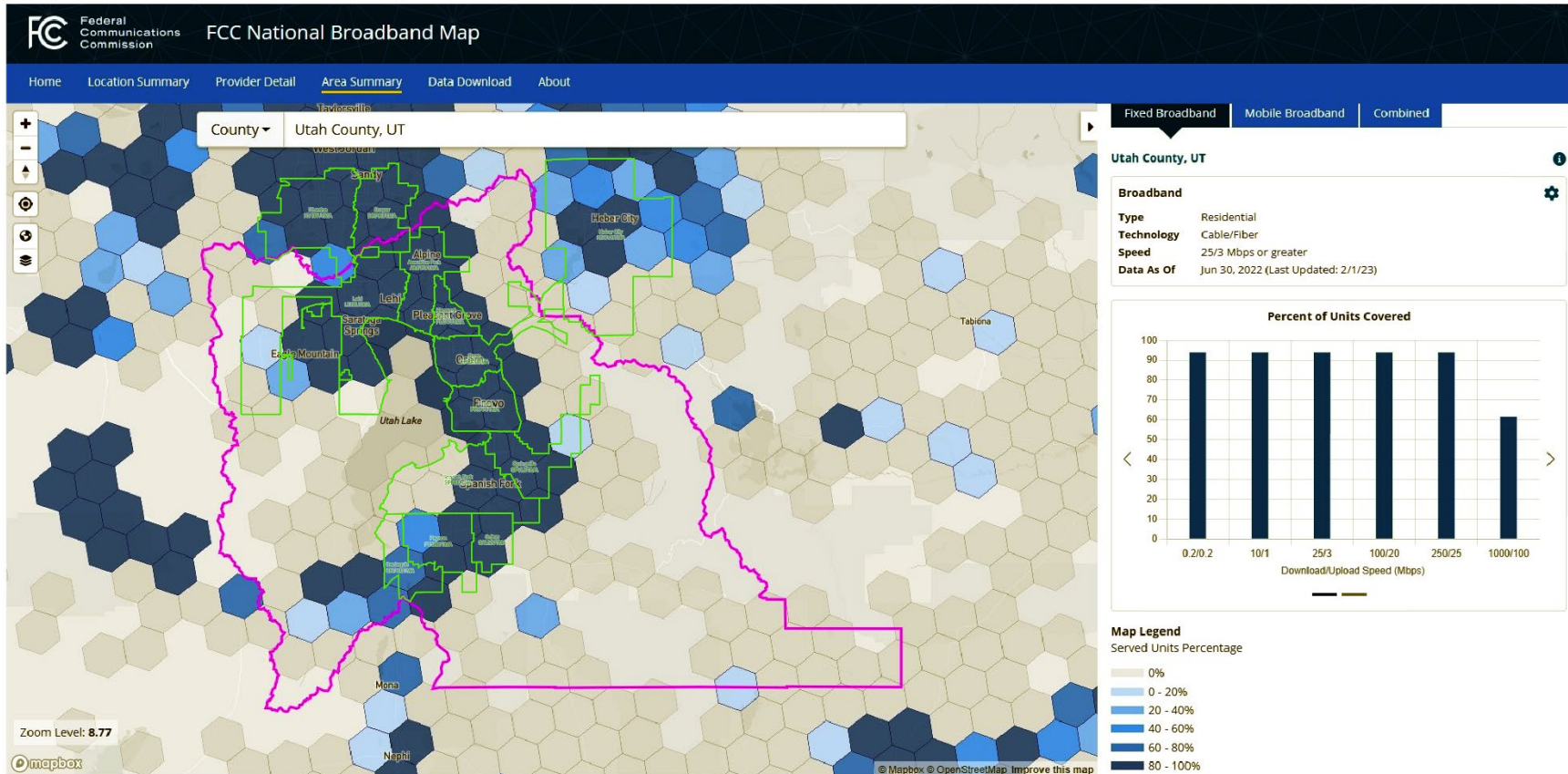
Tooele County Cable / Fiber



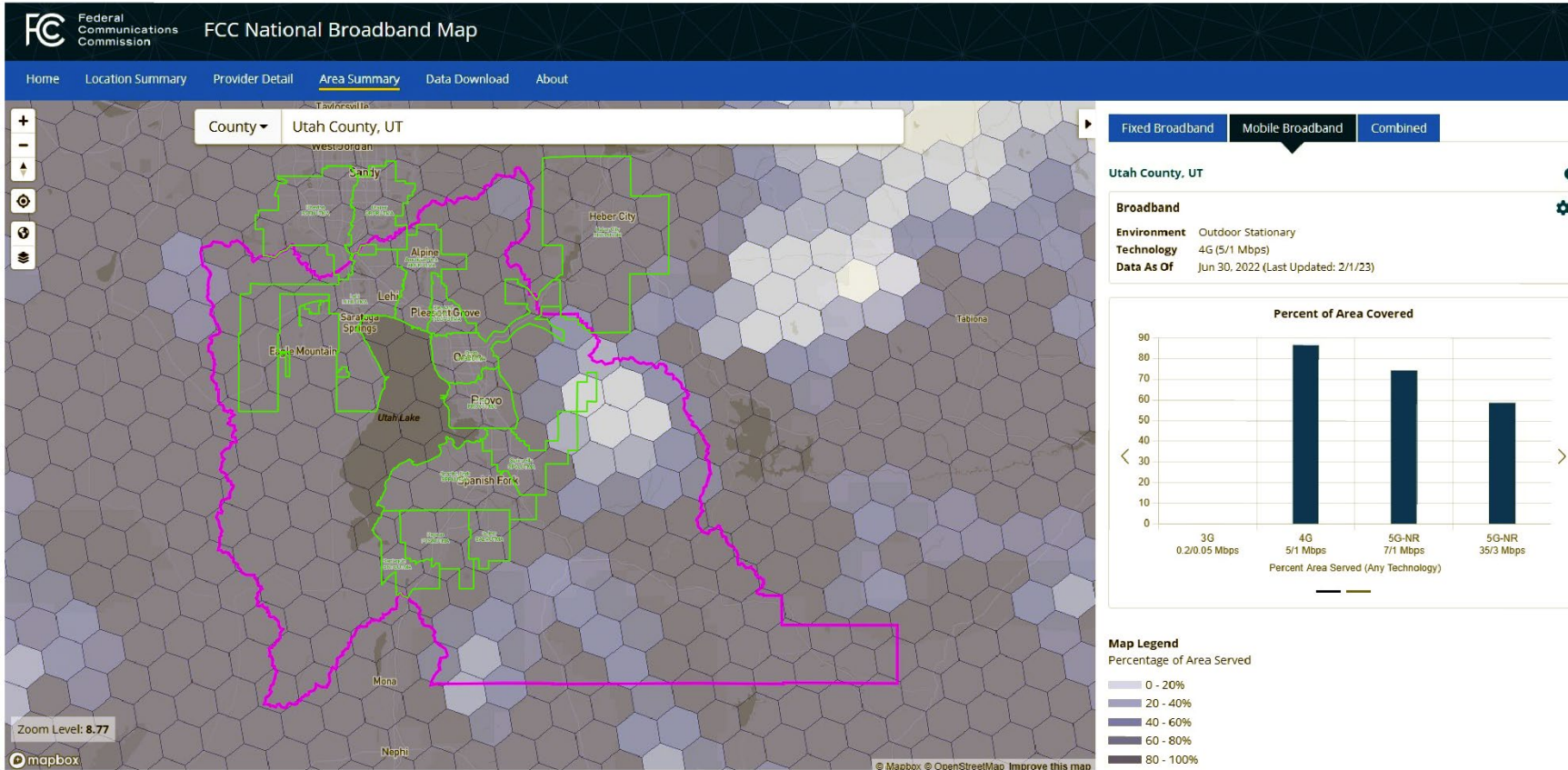
Tooele County Mobile



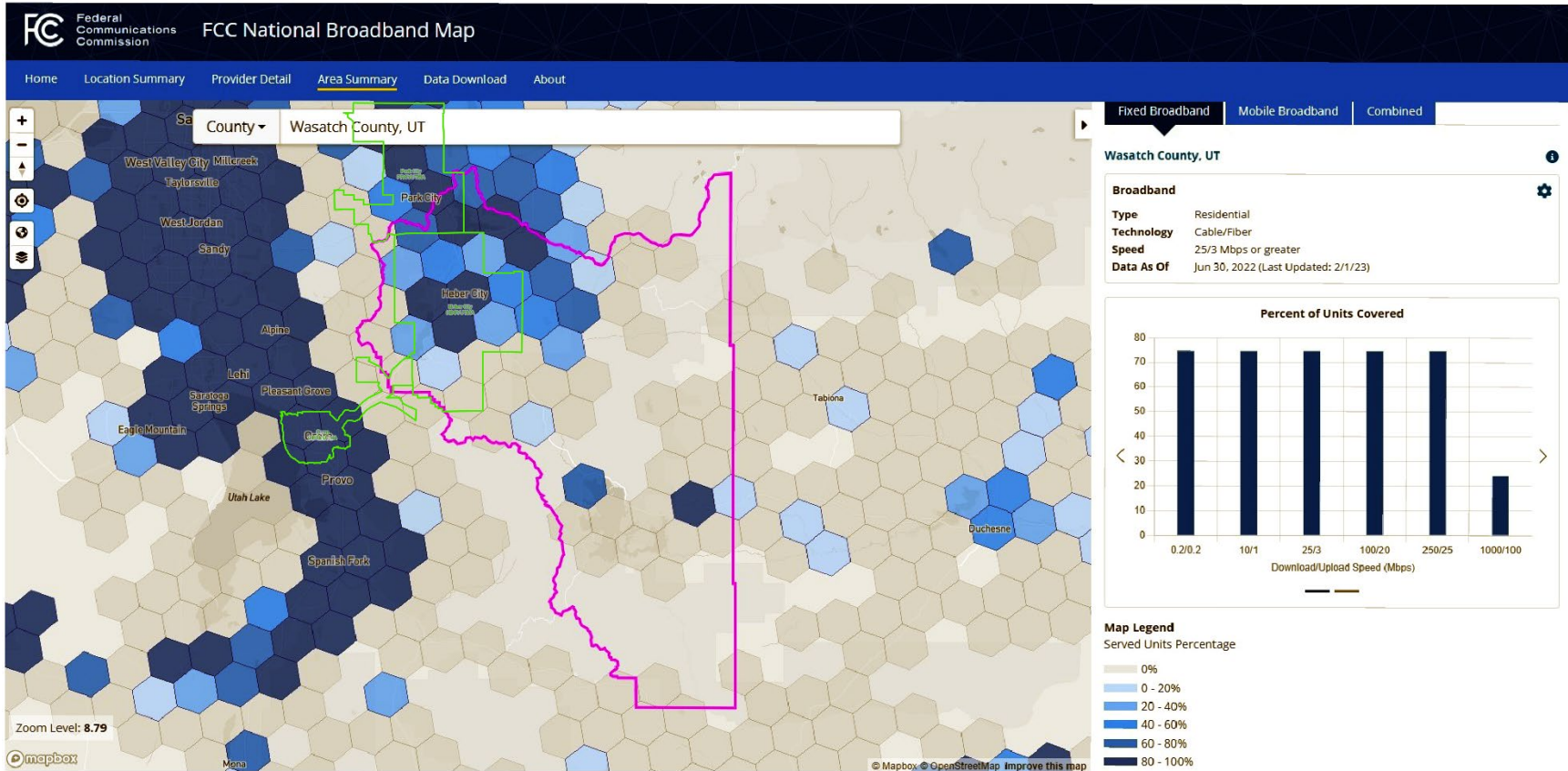
Utah County Cable / Fiber



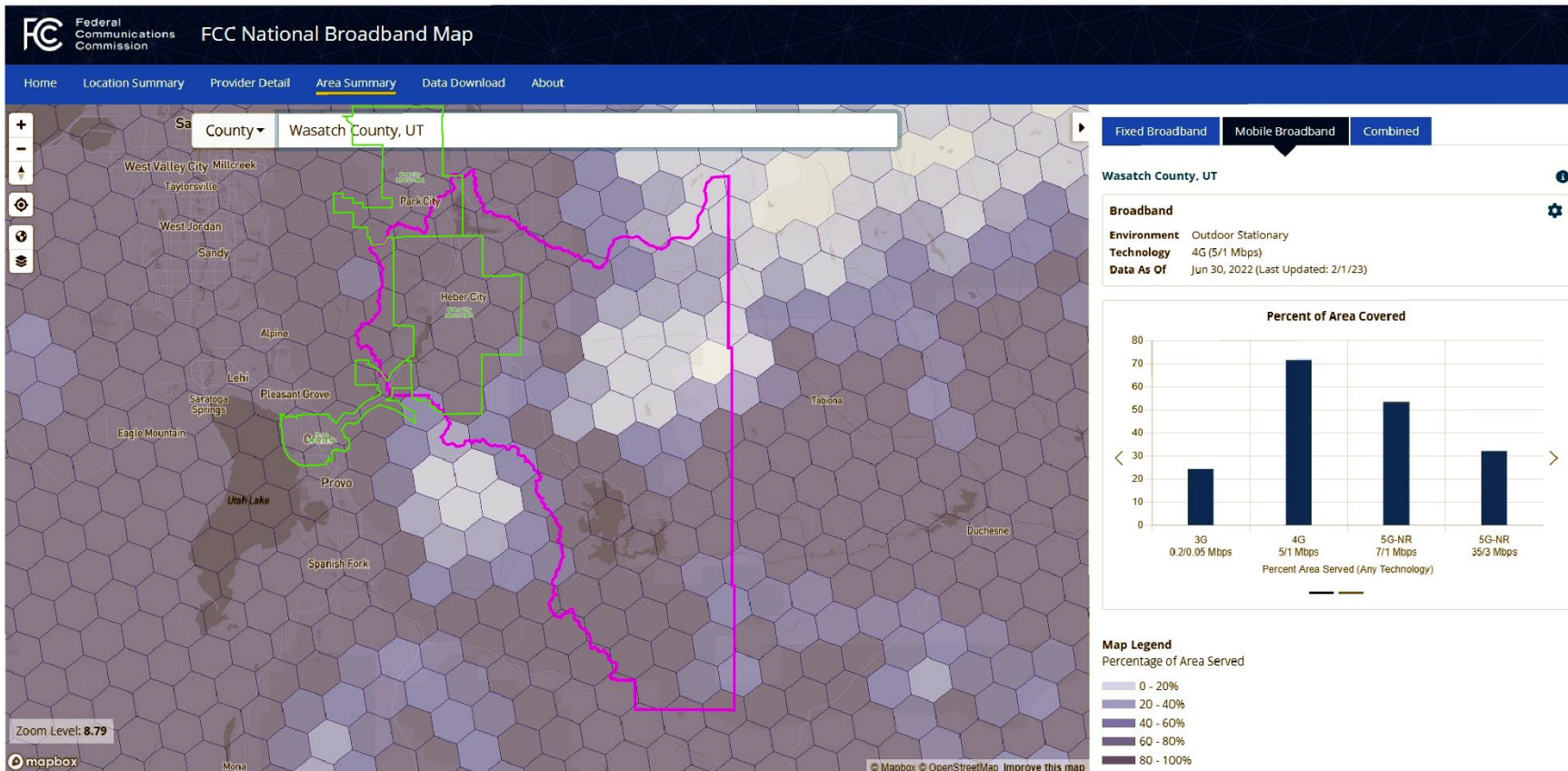
Utah County Mobile



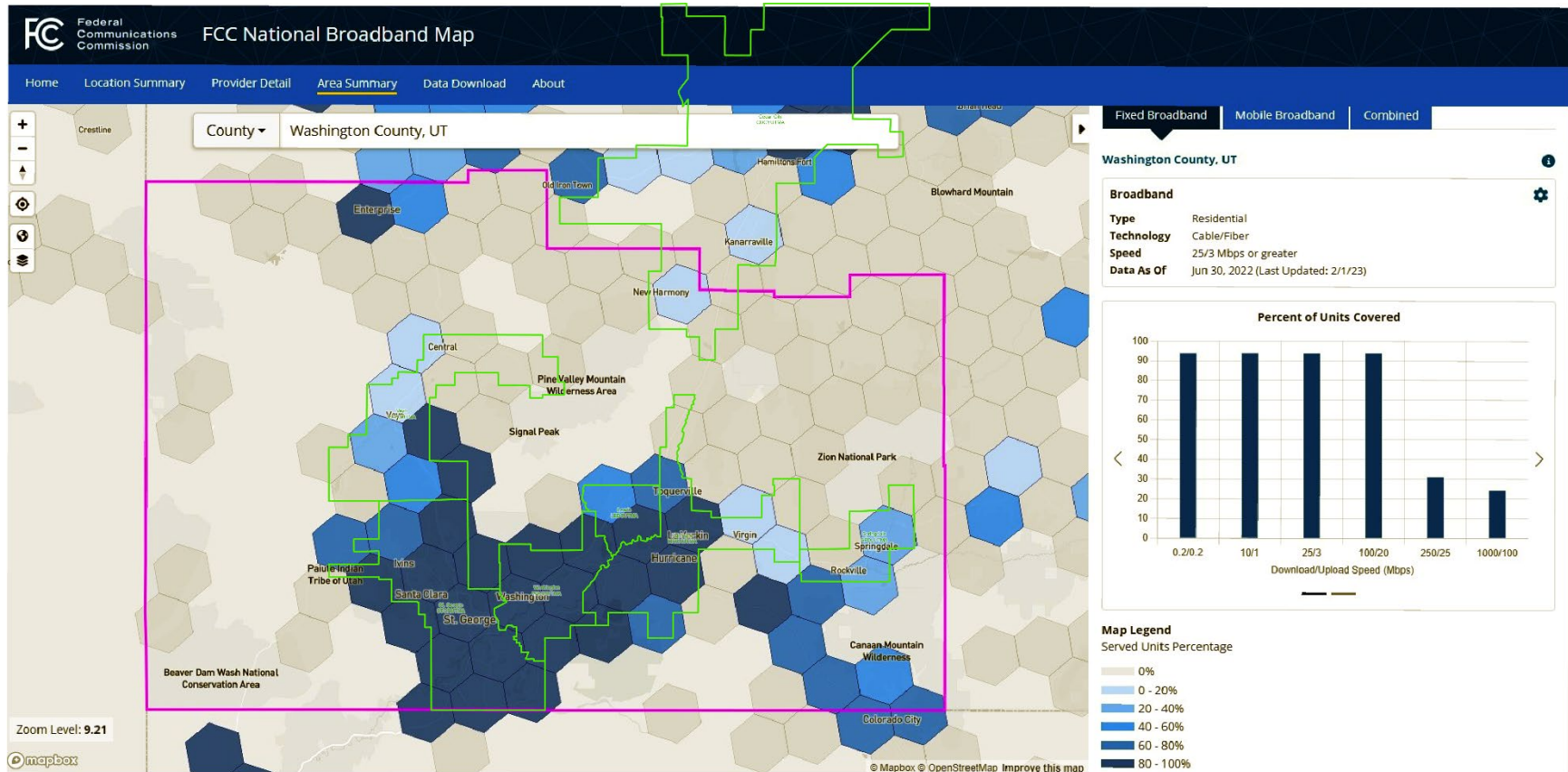
Wasatch County Cable / Fiber



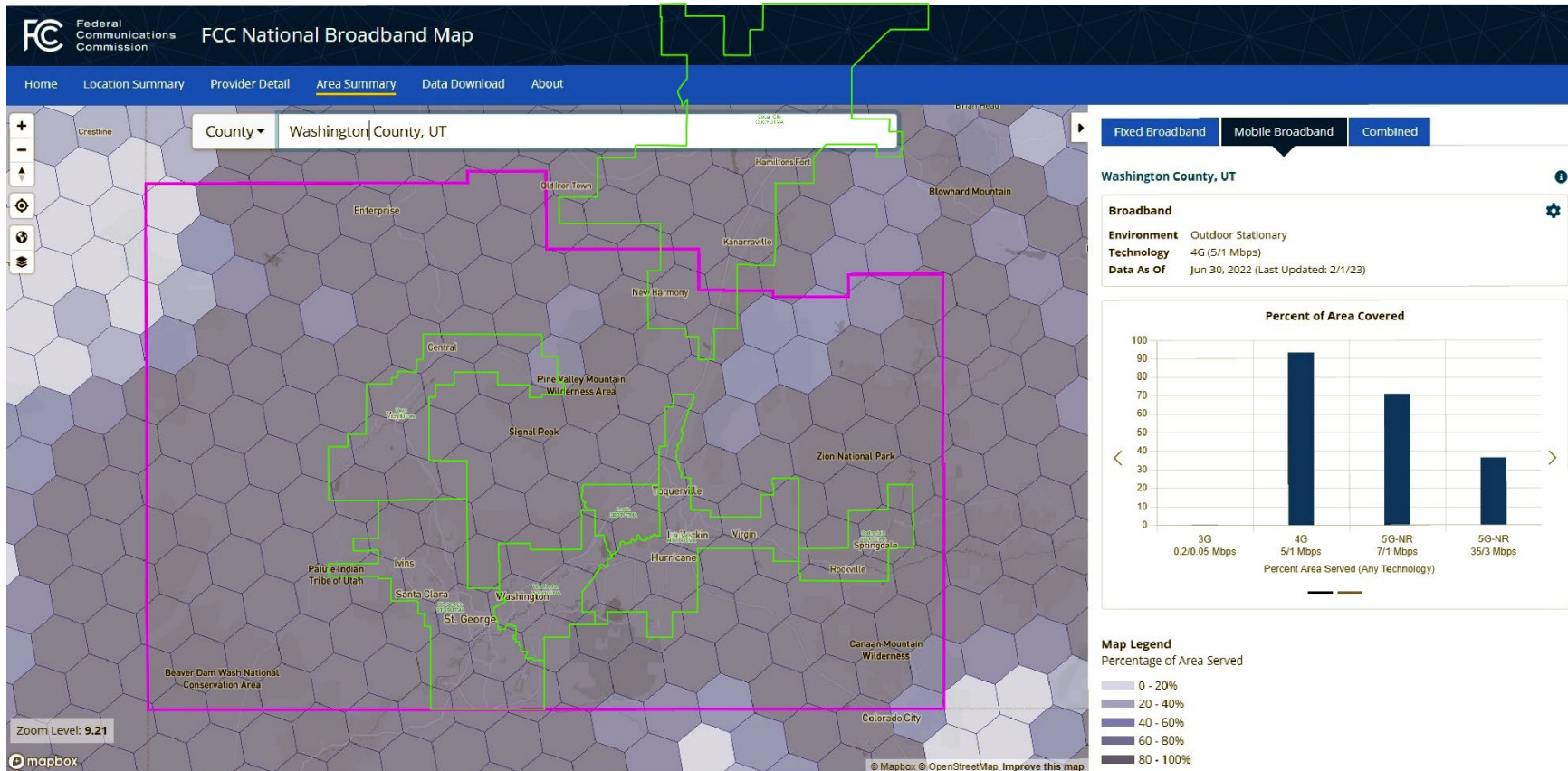
Wasatch County Mobile



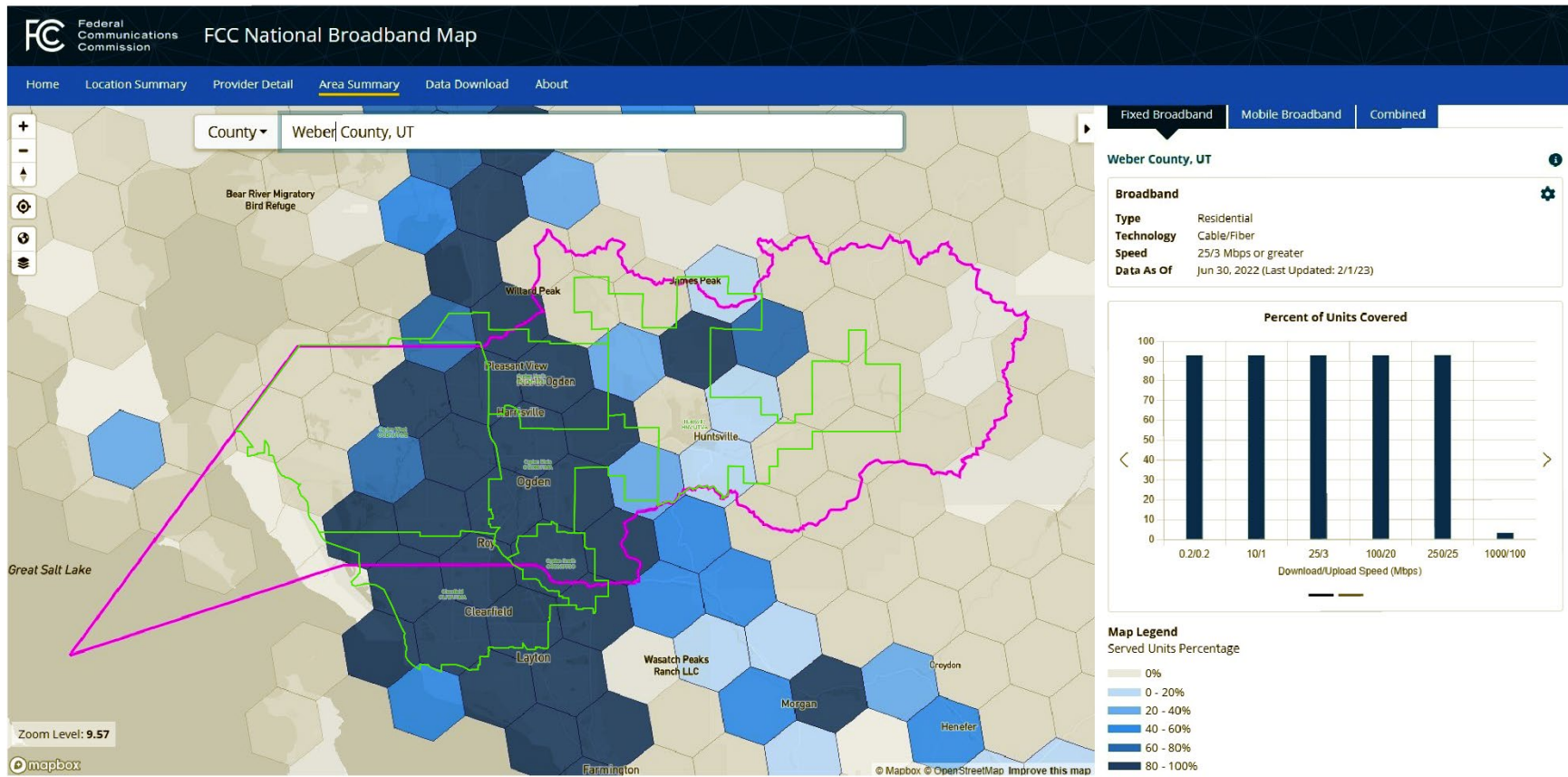
Washington County Cable / Fiber



Washington County Mobile



Weber County Cable / Fiber



Weber County Mobile

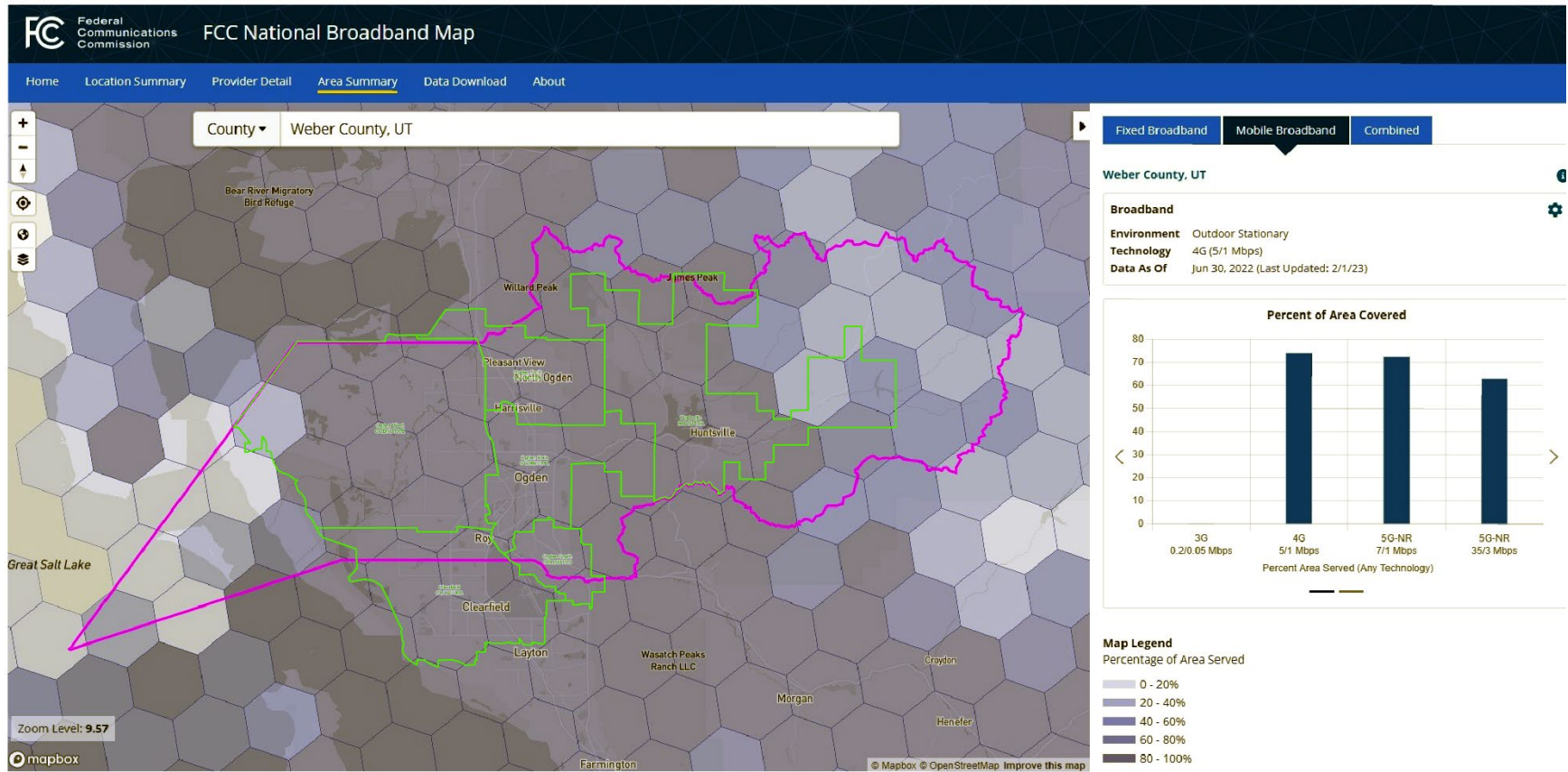
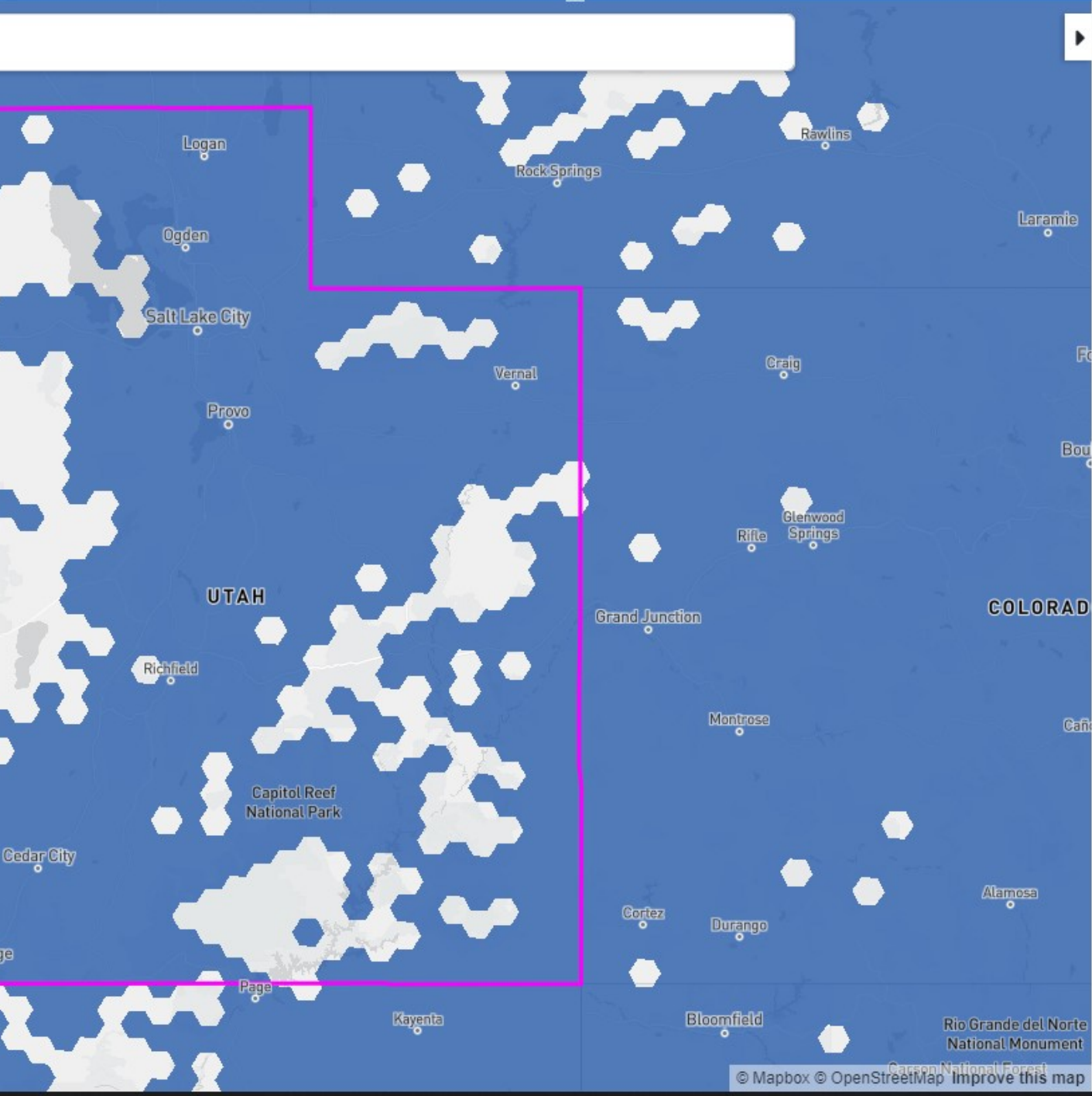


EXHIBIT 6

Broadband Map

Home | Data Download | About | Broadband Funding Map



Utah

Broadband
Type
Technology
Speed
Data As Of

- Space Explor
- Hughes Netwo
- Viasat
- Comcast Corp
- T-Mobile US
- Lumen Techno
- JAB Wireles
- Verizon Comm
- FIF Utah
- Beehive Tele

Map Legend

Served Units Per

