

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of)
)
Qwest Corporation DBA CenturyLink QC) Docket No. 23-049-01
)
Petition for Statewide Exemption from Carrier)
Of Last Resort Obligations)

**DIRECT TESTIMONY OF DOUGLAS DUNCAN MEREDITH
ON BEHALF OF THE
UTAH RURAL TELECOM ASSOCIATION**

October 19, 2023

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1 **I. Witness Qualification**

2 **Q: Please state your full name, place of employment and position.**

3 A: My full name is Douglas Duncan Meredith. I am employed by JSI, LLC (“JSI”) as
4 Director – Economics and Policy. JSI is a telecommunications consulting firm
5 headquartered in Greenbelt, Maryland. JSI is a full-service consulting firm,
6 providing operational, financial, management, regulatory, marketing, and strategic
7 assistance to independent community-based communications providers. JSI has
8 provided telecommunications consulting services to communications providers
9 since 1963.

10 **Q: Please describe your professional experience and educational background.**

11 A: As the Economic Advisor at JSI, I assist clients with the development of policy
12 pertaining to economics, pricing, and regulatory affairs. I have been employed by
13 JSI since 1995. Prior to my work at JSI, I was an independent research economist
14 in the District of Columbia and a graduate student at the University of Maryland –
15 College Park.

16 In my employment at JSI, I have participated in numerous proceedings for rural and
17 non-rural telephone companies. These activities include, but are not limited to, the
18 creation of forward-looking economic cost studies, the development of policy
19 related to the application of the rural safeguards for qualified local exchange
20 carriers, the determination of Eligible Telecommunications Carriers (“ETCs”), the
21 sustainability and application of universal service policy for telecommunications
22 carriers, as well as supporting incumbent local exchange carriers in arbitration
23 proceedings, rural exemption suspension and/or modification proceedings.

24 In addition to assisting telecommunications carrier clients, I have served as the
25 economic advisor for the Telecommunications Regulatory Board of Puerto Rico
26 since 1997. In this capacity, I provide economic and policy advice to the Board

27 Commissioners on telecommunications issues that have either a financial or
28 economic impact on carriers or end-users. I have participated in a number of
29 arbitration panels established by the Board to arbitrate interconnection issues under
30 Section 252 of the Telecommunications Act of 1996. Many of these arbitration
31 decisions have been appealed to and upheld by the U.S. Court of Appeals, First
32 Circuit.

33 I have participated in numerous national incumbent local exchange carrier and
34 telecommunications groups, including those headed by NTCA—The Rural
35 Broadband Association (including OPASTCO), USTelecom, and the Rural Policy
36 Research Institute. My participation in these groups focuses on the development of
37 policy recommendations for advancing telecommunications capabilities in rural
38 communities, universal service, and other policy matters.

39 I have a Bachelor of Arts degree in Economics from the University of Utah, and a
40 Master’s Degree in Economics from the University of Maryland – College Park.
41 While attending the University of Maryland – College Park, I was a Ph.D. candidate
42 in Economics, having completed all coursework, comprehensive and field
43 examinations for a Ph.D. in Economics.

44 **Q: Have you testified previously in federal and state regulatory proceedings on**
45 **telecommunications issues?**

46 A: Yes. In addition to providing testimony before this Commission, I have testified live
47 or in pre-filed regulatory testimony in various states including Arizona, Colorado,
48 Georgia, Indiana, Kansas, Maine, Michigan, Montana, North Dakota, New
49 Hampshire, New York, Oklahoma, South Carolina, Tennessee, Texas, Vermont,
50 and Wisconsin. I have also participated in regulatory proceedings in many other
51 states that did not require formal testimony, including Florida, Louisiana,
52 Mississippi, South Dakota, Puerto Rico, and Virginia. In addition to participating in
53 state regulatory proceedings, I have participated in federal regulatory proceedings

54 through filing of formal comments in various proceedings and submission of an
55 economic report in an enforcement proceeding.

56 **Q: On whose behalf are you testifying in this proceeding?**

57 A: I am providing testimony on behalf of the Utah Rural Telecom (“URTA”). URTA’s
58 members are listed in Exhibit DDM-01.

59 **Q: Have you reviewed the Lumen Petition for Exemption from the Carrier of Last
60 Resort Obligation filed June 20, 2023, the Direct Testimony of David Ziegler
61 filed August 1, 2023, and the Lumen Substitution of Exhibit 6 to Mr. Ziegler’s
62 testimony filed August 2, 2023?**

63 A: Yes. I will refer collectively to Lumen/Quest/CenturyLink in this testimony as
64 “CenturyLink”.

65 **Q: Was this testimony prepared by you or under your direct supervision?**

66 A: Yes.

67 **II. Introduction**

68 **Q: Please provide a summary of your testimony.**

69 A: Utah’s Carrier of Last Resort (“COLR”) obligation remains an important tool the
70 Commission uses to ensure that affordable and reliable public telecommunications
71 services, which includes basic local exchange service, are available to all locations
72 within the state. The Commission should not discard this tool without requiring the
73 petitioner to demonstrate its eligibility for relief, including that such relief is in the
74 public interest. I present testimony that supports a Commission determination to
75 retain CenturyLink’s COLR obligations for much of its service area. I recommend
76 the Commission grant the petition in the limited areas that meet the standards for
77 relief described below and retain COLR obligations in the remaining areas. As a

78 condition of granting relinquishment of CenturyLink’s COLR obligations in any
79 area, the Commission should require another COLR to replace CenturyLink’s
80 COLR obligation to protect and advance the public interest. This would follow
81 the federal method and manner for relinquishing federal COLR-like obligations. In
82 addition to these recommendations, I respond to statements made by CenturyLink
83 in its Petition, and in the Direct Testimony of Mr. David Ziegler.

84 **III. Carrier of Last Resort Obligations**

85 **Q: Please describe Utah’s Carrier of Last Resort Obligation.**

86 A: Carriers of Last Resort are obligated “to provide public telecommunications service
87 to any customer or class of customers that requests service within the local
88 exchange.”¹ Every incumbent local exchange carrier (“ILEC”) in Utah is a COLR
89 for every local exchange it serves. CenturyLink is the ILEC and COLR for 61 wire
90 centers or local exchanges throughout the state.² Unlike competitive carriers in an
91 exchange who can provide service to select customers, COLRs are obligated to
92 serve every customer (business and residential) that requests service subject to
93 applicable line extension tariffs.

94 **Q: Is Utah’s COLR obligation similar to a corresponding federal obligation?**

95 A: Yes. When the Telecommunications Act of 1996 (“Act”) opened competition to
96 local exchange areas served by ILECs, the FCC designated all ILECs as Eligible
97 Telecommunications Carriers (“ETCs”) under Section 214(e) of the Act. ETC
98 designation allows carriers to be eligible to receive universal service support for
99 their designated areas. ETC designation obligates carriers to offer universal services
100 and advertise the availability of such services.

¹ Utah Code § 54-8b-15(1)(b). Another plain reading of the Utah law is that COLR obligations include the offering of all regulated telecommunications services offered by an incumbent local exchange carrier (“ILEC”) since every ILEC is a COLR.

² Petition at 10.

101 Congress intended that all communities or any portion of those communities have a
102 carrier designated as an ETC. When an area does not have an ETC designated
103 carrier, either the Federal Communications Commission (“FCC”) for interstate
104 services or the Utah Public Service Commission (“PSC” or “Commission”) for
105 intrastate services are directed to “determine which common carrier or carriers are
106 best able to provide such service to the requesting unserved community or portion
107 thereof and shall order such carrier or carriers to provide such service to that
108 unserved community or portion thereof.”³

109 Furthermore, when an ETC seeks to relinquish its ETC designation for an area it
110 serves, the PSC is directed to ensure “that all customers served by the relinquishing
111 carrier will continue to be served by another ETC.”⁴

112 **Q: What guidance do you recommend the Commission take from the federal ETC**
113 **obligation and relinquishment of ETC designation?**

114 A: The federal ETC designation process established by Congress informs the
115 Commission on at least two items related to this proceeding. First, Congress takes
116 seriously ETC obligations and specifically intended for ETC designation to be
117 compatible with the introduction of competition in local exchange service areas.
118 Second, Congress intended for all locations to have public universal services
119 available to all communities or portions of communities. The idea Congress enacted
120 was to have a carrier obligated to provide universal services for every portion of
121 every community. This is an important safety net afforded to all locations in served
122 communities.

123 On the state level, the Utah COLR obligation guarantees to residents and business
124 operating in a community or a portion of the community that one carrier is
125 responsible to offer public telecommunications services to every portion of every

³ 47 U.S.C. § 214(e)(3).

⁴ 47 U.S.C. § 214(e)(4).

126 local exchange area in the state. The Utah Legislature provided a mechanism for
127 carriers to be exempt from certain requirements it established. Relief from any
128 requirement requires that the Commission consider the state of effective
129 competition, the public interest and “other relevant factors” pertaining to the
130 request.⁵

131 CentruyLink asserts that “the COLR obligation is an outdated and unnecessary
132 regulatory paradigm” in a competitive market.⁶ However, Congress enacted the
133 ETC designation process in tandem with the introduction of local exchange
134 competition—and the Utah Legislature revisited and reinforced its universal service
135 laws to accommodate local exchange competition. The Commission should not
136 accept CenturyLink’s characterization that Utah’s COLR obligations are outdated
137 and unnecessary just because there is competition. Rather, the Commission should
138 require COLR obligations in CenturyLink local exchanges where relief from these
139 obligations is not in the public interest after considering the relevant factors.

140 CenturyLink argues that since there is a federal process to discontinue telephone
141 service, this makes state based COLR requirements “largely redundant.”⁷ I disagree.
142 However, if the Commission were to accept this premise and grant CenturyLink
143 relief from its state COLR obligations, the Commission should follow the method
144 and means for relinquishing ETC designation at the federal level. At the federal
145 level, the incumbent ETC is not permitted to relinquish its ETC status unless and
146 until another ETC steps in and assumes ETC duties for the area sought to be
147 relinquished. Although CenturyLink’s Petition does not inform the Commission of
148 this federal process, the Commission should require a new COLR in the wire centers
149 where CenturyLink seeks to be relieved of its COLR obligations. I also note that
150 CenturyLink will remain an ETC in all of its wire centers even if the Commission

⁵ Utah Code § 54-8b-3(6).

⁶ Petition at 5. (“*The COLR obligation is an outdated and unnecessary regulatory paradigm.*”)

⁷ Petition at 9.

151 grants CenturyLink’s COLR Petition. Under the Federal Code, “a common carrier
152 designated as an eligible telecommunications carrier . . . shall be eligible to receive
153 universal support . . . and shall, throughout the service area for which designation is
154 received: (a) offer the services that are supported by Federal universal service
155 support mechanisms under Section 254(c) . . . ; and (b) advertise the availability of
156 such services and the charges therefor, using a media of general distribution.”⁸
157 Without, relinquishing it’s ETC designation for the Utah wire centers, CenturyLink
158 remains obligated to provide the universal services described in the Act and required
159 by the FCC.

160 **Q: What market area should the Commission use to judge whether relief from**
161 **CenturyLink’s COLR obligations is warranted?**

162 A: Upon review of the CentruyLink Petition and Direct Testimony of Mr. Ziegler, I
163 understand that CenturyLink would like the Commission to use data for the entire
164 CenturyLink service area in Utah as the standard for some judgments, and the local
165 exchange area a/k/a wire center area for other judgments.⁹ Nowhere does
166 CenturyLink look at portions of local exchange areas where COLR obligations exist
167 and service may or may not be offered solely by CenturyLink—which in my
168 judgment is the level at which the Commission should review CenturyLink’s
169 request.

170 CenturyLink reports local exchange level data in Exhibit 5. This exhibit shows
171 wired, fixed wireless, and mobile¹⁰ broadband coverages in local exchanges (wire
172 centers). The Commission should not consider fixed wireless as a suitable substitute
173 for COLR duties. Fixed wireless providers have no obligation to provide voice
174 service, or any other public telecommunications service. Broadband Internet is not

⁸ 47 USC §214 (e)(1).

⁹ See e.g., Direct Testimony Exhibit 1 and Exhibit 5.

¹⁰ The mobile coverage percentages in the exhibit are for speeds of 5/1 Mbps. This is not considered broadband coverage so this column should not be considered.

175 a substitute for voice service or other required public telecommunications services.
176 In none of CenturyLink's local exchanges does service extend to 100 percent of
177 locations. The highest coverage is the Farmington wire center with 99.83 percent.
178 With this Exhibit, CenturyLink demonstrates that for its reported service area, there
179 are locations, or portions of all communities, that do not have a wireline or fixed
180 wireless service available. Without a carrier assigned to have COLR duties, the
181 portions of the communities lacking service will not have the assurance that
182 someone has the obligation to offer public telecommunications service to them.

183 The data show that the Wasatch Front example is well served but not ubiquitously
184 served. While the Farmington example does show a small portion of no service
185 availability, moving to rural local exchange areas, such as portions of Morgan, Kane,
186 and Juab counties, show that service availability declines to as low as 65.27 percent.
187 And this is from CenturyLink's Exhibit 5 which is used to support the claim that all
188 exchanges are competitively served. The data show the opposite—there are
189 significant portions of communities not served. COLR duties are intended by the
190 Utah Legislature to remedy the gaps in service availability.

191 I recommend the Commission focus on those portions of communities that do not
192 have adequate service availability. The essence of COLR duties is to ensure that all
193 locations have access to public telecommunications services. The fact that none of
194 the communities in Exhibit 5 are 100 percent served demonstrates the benefit of
195 continuing COLR obligations to ensure that all locations have a common carrier that
196 is required to offer public telecommunications services.

197 **Q: Is CenturyLink required to bear the financial burdens of its COLR obligations**
198 **alone? (Mr. Ziegler's testimony 4:21-22)**

199 A: No Utah designated COLR is required to bear the financial burden of its COLR
200 obligation alone. The Utah Legislature provides specific and direct state-based
201 universal service support to COLR carriers. CenturyLink is eligible to receive one-

202 time distributions from the Utah Universal Service Fund (“UUSF”) to extend its
203 network to portions of its local exchange areas where service is requested but not
204 available.¹¹ To date CenturyLink has not availed itself of this enacted provision to
205 reduce the financial burden of its COLR duties. Moreover, CenturyLink voluntarily
206 elected to abandon a more imposing regulatory regime in favor of more flexible
207 incentive regulation under Utah Code 54-8b-2.3. This election to have pricing
208 flexibility foreclosed ongoing UUSF to cover operational expenses. However,
209 excluding itself from this UUSF support provision was CenturyLink’s decision. The
210 Commission should give little weight to consequences CenturyLink now faces due
211 to its own actions and elections.

212 Furthermore, as the Commission is aware, this pricing flexibility elected by
213 CenturyLink requires CenturyLink to continue to offer basic residential service
214 throughout its service area. Specifically, under Utah Code § 54-8b-2.3(2)(b)(ii), “the
215 incumbent telephone corporation shall offer basic residential service throughout the
216 area in which the incumbent telephone corporation is authorized by certificate to
217 provide basic residential service.” In reviewing CenturyLink’s Petition and the
218 Testimony of David Ziegler, I do not see where CenturyLink has specifically sought
219 relief from the requirements of Utah Code §54-8b-2.3(2)(b)(ii). Granting relief from
220 CenturyLink’s COLR obligations does not address this price flexibility requirement
221 that requires offering residential service for all (both existing and future) locations.

222 **Q: Does CenturyLink have line extension tariffs to offset the cost of extending its**
223 **network to distant locations in its local exchange areas?**

224 **A:** Yes. I understand that every COLR operating in Utah has a Commission approved
225 process to require end-users to pay line extension fees to receive service when
226 conditions warrant.¹² This is another avenue for CenturyLink and other COLRs to

¹¹ Utah Code 54-8b-15(3)(d).

¹² Petition at 13, Ziegler at 10.

227 share in the financial burden of their COLR obligations.

228 Both the UUSF and line extension provisions are available to ensure that all
229 locations in a local exchange area have the maximum opportunity to receive public
230 telecommunications services from a common carrier. CenturyLink has provided no
231 data showing its financial burden to remain a COLR. For example, how many times
232 in the past three years has CenturyLink needed to extend its network to a customer
233 location to provide public telecommunications services at the customer's request?
234 At present, the Commission has no data from CenturyLink showing that its COLR
235 obligation has been a financial burden in the recent past.

236 **Q: Does CenturyLink's request to seek relief from offering "voice service to non-**
237 **CenturyLink served customer locations" include all public**
238 **telecommunications services required by Utah's COLR obligation?**
239 **(Testimony at 3:32, Petition at 2)**

240 **A:** No. Utah's COLR obligation includes at minimum the obligation to provide public
241 telecommunications services to any customer or class of customers that requests
242 service within a local exchange.¹³ Since public telecommunications service is
243 defined to be more inclusive than basic local exchange voice service,¹⁴ this
244 requirement extends beyond local exchange flat rate service and measured usage
245 service, and packaged services including voice service listed in CenturyLink's filed
246 exchange and network service price list; to include, among other services, metro
247 optical ethernet in CenturyLink's advanced communications services price list; to
248 interexchange telecommunications services listed in CenturyLink's consumer long

¹³ Utah Code 54-8b-15(1)(b).

¹⁴ Utah Code 54-8b-2(18). ("Public telecommunications service" means the two-way transmission of signs, signals, writing, images, sounds, messages, data, or other information of any nature by wire, radio, lightwaves, or other electromagnetic means offered to the public generally.")

249 distance offering price list.¹⁵

250 Granting CenturyLink the requested relief to not provide voice service to new
251 customers in their local exchange areas does not address the continued COLR
252 obligation for other public telecommunications services covered by the COLR
253 definition since a plain reading of the requirement is that all public
254 telecommunications offerings of an ILEC are included in the COLR obligation.
255 CenturyLink files price lists for the public telecommunications services it offers in
256 its service area. CenturyLink's focus on voice service does not address the
257 availability of public telecommunications services in its local exchanges offered but
258 not currently subscribed by customers. The Commission should recognize the
259 impact of granting a waiver of COLR obligations has an impact larger than just
260 voice services since all public telecommunications services are affected.

261 **IV. Response to Specific Allegations**

262 **Q: Turning now to specific issues for which you seek to respond, please indicate**
263 **your first area of concern.**

264 **A:** The first issue relates to locations and customers. CenturyLink seeks relief from
265 being required to offer service to new customers. It states that even if it was not
266 required to extend infrastructure to a new location, it wishes to be removed of the
267 obligation to offer public voice telecommunications to new customers.¹⁶ Consider
268 current CenturyLink customers. CenturyLink says it will continue to serve the
269 existing customer. However, once the current customer moves-out all obligations to
270 this location expire. This is also true for the many locations where wireless service
271 is not available or inadequate due to terrain and other factors. This decision would
272 leave any future move-in resident without a carrier that is obligated to offer them

¹⁵ According to Utah Code 54-8b-2.3, it appears that public telecommunications services includes all items on CenturyLink's filed price lists at the Commission.

¹⁶ Petition at footnote 1.

273 public telecommunications services. This leads to a situation where access to
274 emergency services is not guaranteed by a COLR. The decision to serve a new
275 customer would be subject to the corporate financial decision of CenturyLink
276 whether the new customer at the existing location will receive the public
277 telecommunications services they seek. This result is not in the public interest.
278 Guaranteed access to reliable public telecommunications services is a keystone to
279 the state’s universal service policies. A COLR should be assigned to serve all
280 locations in the state’s local exchange areas—if not CenturyLink, then prior to
281 removing CenturyLink, another carrier should be assigned COLR obligations.

282 **Q: CenturyLink argues that it should have access to the UUSF if COLR relief is**
283 **not granted on a local exchange or service area basis. (Petition at 3) What is**
284 **your response?**

285 A: CenturyLink is currently eligible to receive UUSF through the one-time distribution
286 mechanism. I mentioned earlier that no Utah COLR is required to bear the financial
287 burden of COLR obligations alone. Line extension fees, UUSF, and even federal
288 and state-administered grants can offset the infrastructure costs associated with
289 COLR obligations. Moreover, if CenturyLink wanted, it could rearrange its
290 regulatory condition to become eligible for ongoing UUSF—such condition
291 requires it be subject to regulatory review by the Commission.

292 CenturyLink claims but has not documented any burdensome costs associated with
293 meeting its COLR obligations. Armed with this information, the Commission could
294 make an informed decision on the use of one-time UUSF support for these instances.
295 Given that CenturyLink states that customers are moving rapidly to other providers,
296 perhaps the burden to extend its existing network is small and the petition is a mere
297 academic exercise. There is no financial information in the CenturyLink
298 presentation showing the magnitude of the financial burden it claims.

299 **Q: Has CenturyLink shown that there is effective competition in each of its local**

300 service areas that meets the Utah standard of showing “the ability of
301 alternative telecommunications providers to offer competing
302 telecommunications services that are functionally equivalent or substitutable
303 and reasonably available at comparable prices, terms, quality, and
304 conditions?” (54-8b-3(5)(b)).

305 A: No. CenturyLink states there are terrestrial wireless and celestial wireless (satellite)
306 service providers in the state but gives the Commission no evidence showing that
307 these services are offered at comparable prices, terms, quality, and conditions as its
308 voice services. It argues that since customers have left CenturyLink to other
309 providers that the services are comparable. Alternatively, the customers may be
310 faced with the choice to remain a customer of CenturyLink and not receive adequate
311 service or move to a less affordable service provider.

312 Consider, for example, the satellite option referenced by CenturyLink.¹⁷ There are
313 LEO satellite offerings that provide broadband services—upon which a customer
314 can then add a VoIP service on top of their broadband service. Yet the price for this
315 arrangement is not comparable to CenturyLink’s \$25.00 flat rated basic local
316 exchange service.¹⁸ For example, StarLink’s equipment installation is currently
317 \$599.00 and monthly service rate is \$120.00 per month.¹⁹ This service does not
318 include the interconnected VoIP service that would be in addition to these fees. This
319 offering is not available at comparable prices to the CenturyLink \$25.00 offering.
320 This access to emergency services and the ability to send and receive telephone calls
321 using the Public Switched Telephone Network (“PSTN”) would not be affordable
322 to many end-user customers.

323 Many locations in rural areas of Utah cannot access terrestrial wireless services.

¹⁷ Testimony at 14:12-14.

¹⁸ CenturyLink Price List Section 5.2.4 Flat Rate Service, residential 1FR service is \$25.00 nonrecurring and \$31.00 monthly, filed Jan 31, 2023.

¹⁹ Exhibit DDM-2 – StarLink offering accessed Oct 10, 2023.

324 These locations rely on, or would need to rely on, a wireline connection to the PSTN
325 and the Internet. Absent a COLR to offer public telecommunications services, these
326 locations would not have access to essential services, including emergency services.
327 Eliminating a COLR obligation for these locations is not in the public interest using
328 the standards recommended by the Utah Legislature.²⁰

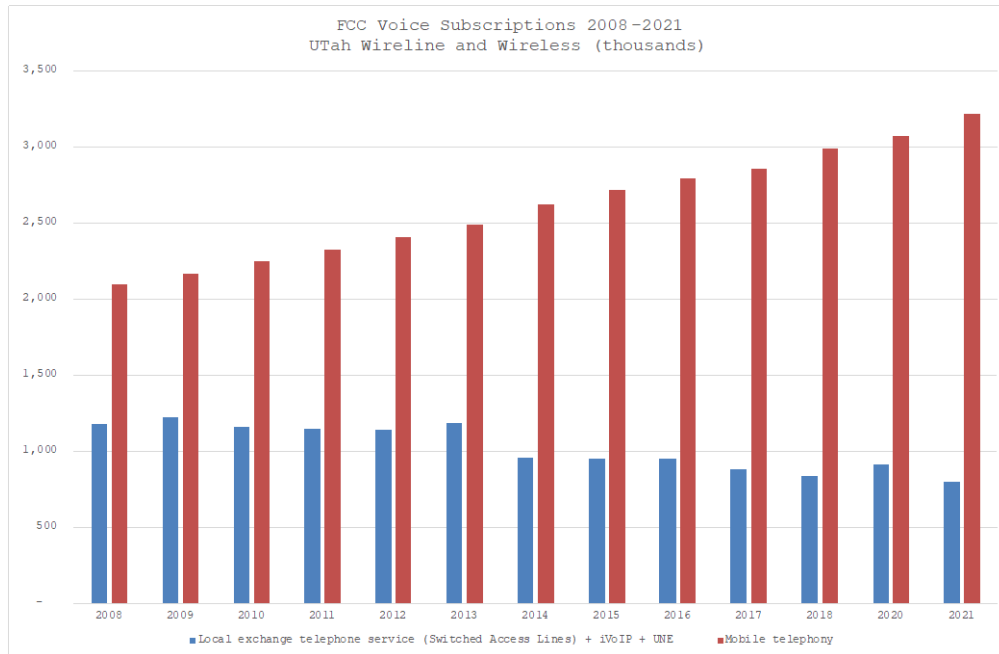
329 **Q: Does Exhibit 1 show that landline service is not used as an important**
330 **connection to the PSTN?**

331 A: No. CenturyLink provides the results of a survey that shows only 1.9 percent of
332 Utah households use a landline service as their only voice service. This datapoint
333 may be misleading since the same data source shows that 26.6 percent use landline
334 service for some portion of their communication needs. The survey shows that
335 wireless-only customers represent a supermajority at 72.8 percent—yet over one-
336 quarter of the surveyed population in Utah use wireline telephones at home in
337 combination with wireless or without wireless. The data in a wider perspective show
338 is there is use of wireless service, but that wireless is a complementary service to
339 wireline service for 25 percent of the households in Utah. There is continued use
340 and reliance on wireline voice service in the state.

341 The emergence of wireless service is also evident in the FCC’s voice data. Figure 1
342 shows an increase in mobile service and a relatively stable but declining wireline
343 service demand (here wireline service includes switched, iVoIP and UNE
344 provisioning) from 2008 to 2021.

²⁰ Once again, I reiterate that the federal guidance on ETC designation and relinquishment informs the Commission that another COLR should be assigned to local exchanges prior to granting relief to CenturyLink. See 47 U.S.C. § 214(e).

Figure 1



346

347 Despite the obvious increase in mobile services, wireline services reached a peak
 348 over this period in 2009 with 1.230 million subscriptions and has declined to 803
 349 thousand in 2021 (a 35 percent decline in subscriptions since 2009). The 803
 350 thousand wireline subscriptions in Utah indicate a continued use of and preference
 351 for wireline service. The number of wireline subscribers in 2021 is 20 percent of all
 352 voice subscriptions—a datapoint that is consistent with the CDC data showing that
 353 over 26 percent of households use a wireline service in their home.

354 Mobile wireless service is not a functional equivalent for wireline voice. There are
 355 many businesses that use wireline service for their operations, and there are
 356 residential locations where mobile voice is not available or the quality of the service
 357 is poor.

358 **Q: Do you have observations about Exhibit 5? Have you been able to quantify the**
 359 **number of households in each county that do not have any competitive option**
 360 **to replace CenturyLink?**

361 A: Yes. I have examined the most recent Broadband Data Collection filing available
 362 (Data as of Dec. 2022) to quantify how many locations in each county only have
 363 CenturyLink as a provider. The BDC data is limited in this investigation because it
 364 only asks providers to report broadband Internet service availability. (BDC also
 365 collects subscribership data but at the Census Tract level, but this level of
 366 granularity limits its use in this proceeding.) Notwithstanding, the BDC data shows
 367 that CenturyLink is the only reporting provider of broadband Internet service for
 368 nearly 20,000 locations in Utah. I have prepared Table 1 to report CenturyLink data
 369 in the most recent BDC data submission. These data are aggregated by County and
 370 show the number of locations in Utah where CenturyLink is the only provider at
 371 that location.

372 Table 1

CenturyLink Locations		
County	Locations Where CenturyLink Wireline is the Only Provider	Locations CenturyLink Fiber is the Only Fiber Provider
Beaver	115	-
Box Elder	481	110
Cache	1,333	346
Davis	756	4,144
Iron	795	10
Juab	425	-
Morgan	936	57
Salt Lake	3,496	26,048
Sevier	589	82
Summit	727	354
Tooele	1,112	2,481
Utah	3,061	5,660
Wasatch	1,183	342
Washington	1,435	4,375
Weber	3,066	1,275
TOTAL	19,510	45,284

373

374 These data show an impact of granting CenturyLink’s request for COLR throughout
375 the state. Since BDC data reports broadband availability, granting this request would leave
376 nearly 20,000 locations throughout the state without another wireline broadband Internet
377 provider. While these data do not reflect the provision of public telecommunications
378 services required by COLR, I suggest it is likely that these locations would also be left
379 without an option for public telecommunications services. To the extent BDC data informs
380 the Commission on COLR duties, there are locations throughout Utah where CenturyLink
381 is the only wireline provider of broadband Internet. These data suggest further there are a
382 considerable number of locations that would not have a COLR to provide public
383 telecommunications services.

384 **V. Conclusion**

385 **Q: Please summarize your recommendations to the Commission.**

386 A: This proceeding is a case of first impression on how the Commission will address
387 COLR obligations established by the Utah Legislature. I reviewed the importance of COLR
388 policy and address specific issues raised in the CenturyLink petition and testimony.

389 I recommend the Commission accept the guidance of the federal ETC
390 relinquishment process and require a COLR to be replaced in every local exchange prior
391 to granting COLR obligation relief. This recommendation is in the public interest and
392 provides a guarantee to end-user customers and other users of public telecommunications
393 services that a carrier is obligated to offer service throughout the local exchange.

394 **Q: Does this end your Pre-filed Direct Testimony?**

395 A: Yes. I request the opportunity to revise and/or supplement my testimony as new
396 information becomes available or issues arise, including the review of Confidential
397 Exhibits not yet available to me.

Exhibit DDM-01

Utah Rural Telecom Members

All West Communications, Inc.
Bear Lake Communications, Inc.,
Beehive Telephone Company dba Beehavie Broadband
Carbon/Emery Telcom, Inc.
Central Utah Telephone, Inc.
Direct Communications Cedar Valley, LLC
E Fiber Moab, LLC
E Fiber San Juan, LLC
Emery Telephone
Gunnison Telephone Company
Hanksville Telcom, Inc.
Manti Telephone Company
Skyline Telecom
South Central Utah Telephone Association, Inc. dba SC Broadband
UBTA-UBET Communications, Inc. dba Strata Networks
Union Telephone Company

Exhibit DDM-02


StarLink offering accessed October 10, 2023


264 Woodard Rd, Arnold, MD 21012, USA

Starlink is available at your address!
No contracts, 30-day trial. Ships in 1-2 weeks.
[▶ Product & Service Overview](#)

\$120/mo for service and \$599 for hardware.

I already have my Starlink.
[Find my Starlink identifier](#)





Service	\$120.00/mo
Hardware	\$599.00
Shipping & Handling	\$50.00
Tax	\$38.94
DUE TODAY	\$687.94

By placing this order, I agree to the Starlink [Terms Of Service and Privacy Policy](#). You can cancel the recurring payment at any time via your Starlink Account. Starlink may update its Service Terms and pricing as needed after providing the required notice to you.

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the Direct Testimony of Douglas Meredith on behalf of URTA, Docket 23-049-01, was served the 19th day of October, 2023 as follows:

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