

March 23, 2026

*Via Email:*  
*psc@utah.gov*

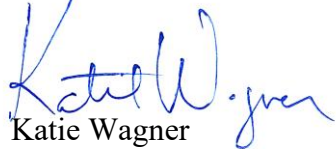
Gary Widerburg  
Commission Administrator  
Utah Public Service Commission  
Heber M. Wells Building, 4<sup>th</sup> Floor  
160 East 300 South  
Salt Lake City, UT 84111

**RE: Docket No. 26-049-02**  
**CenturyLink's Response to Comments**

Dear Mr. Widerburg:

Attached for filing is CenturyLink's Response to Comments by the Division of Public Utilities.

Sincerely,



Katie Wagner  
Senior Corporate Counsel

Attachments  
cc: Service List

**BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH**

INVESTIGATION OF QWEST CORPORATION )  
D/B/A CENTURYLINK QC'S NOTICE OF ) **DOCKET No. 26-049-02**  
PLANNED DISCONTINUANCE OF )  
RESIDENTIAL VOICE SERVICE IN )  
SPRINGDALE, UTAH )  
\_\_\_\_\_ )

**CENTURYLINK'S RESPONSE COMMENTS**

COMES NOW, Respondent Qwest Corporation dba CenturyLink QC ("CenturyLink"), by and through its undersigned counsel and submits its Response Comments.

**1. Introduction**

CenturyLink respectfully submits that the record in this proceeding confirms that its planned discontinuance of legacy voice (POTS) service in the Springdale, Utah wire center complies with all applicable federal and state law. As the Division of Public Utilities (Division) correctly concludes, recent amendments to Utah law expressly establish a federal-led discontinuance framework under which approval by the Federal Communications Commission ("FCC") is the operative regulatory action. Accordingly, no further investigation or process is required in this docket.

**2. Response To The Commission's Investigatory Questions**

**a. Compliance with Applicable Law**

The Division has already addressed the central issue presented by the Commission – whether CenturyLink's Discontinuance Letter or planned actions violate any Utah statute, administrative rule, or prior Commission order – and concluded that no such violation exists. CenturyLink agrees.

As explained in the Division’s filing, the 2025 amendments establish a clear and controlling framework: under Utah Code Ann. §§ 54-8b-2.3(11) and 54-8b-3(8) discontinuance authority is determined at the federal level pursuant to 47 U.S.C. § 214(a). Once the FCC grants such authority, the Commission “shall recognize and adopt” those findings. This statutory language removes any requirement for prior Commission approval or separate state-level authorization.

**b. Customer Notice and Service Alternatives**

The Commission’s Notice raises concerns regarding the content of the Discontinuance Letter, including the absence of detailed FCC docket information and the characteristics of replacement services. CenturyLink’s notice fully complies with FCC customer notification requirements, which mandate that notice be provided prior to or contemporaneously with the filing of the FCC application. As a result, inclusion of a specific FCC docket number at the time of mailing is not required. The notice also appropriately informs customers of available alternatives, including a functionally equivalent replacement service and other market options. The disclosure regarding battery backup for power outages is consistent with federal transparency requirements and ensures customers are fully informed.

**c. Administrative Rules**

To the extent Utah Administrative Code R746-350-1 might otherwise apply, the Division correctly determined that the statutory framework enacted in 2025 supersedes that rule in the context of discontinuances governed by Utah Code Ann. § 54-8b-3(8). The statute provides the exclusive pathway for discontinuance under these circumstances.

**3. Agreement With The Division’s Conclusions**

CenturyLink agrees with the Division’s determination that: (1) The Company has not violated any applicable Utah statute, administrative rule, or prior administrative order; and (2) the 2025

amendments to Utah law make the proposed discontinuance legally permissible without coordination with or prior approval from the Commission.

The Legislature’s use of mandatory language – providing that the Commission “shall recognize and adopt” FCC discontinuance findings – confirms that the state’s role is limited and non-discretionary once federal approval is granted.

#### **4. Response to PSC Secretary Correspondence**

CenturyLink respectfully disagrees with the suggestion in the March 18, 2026 correspondence from the PSC Secretary that “there will likely be a proceeding before the PSC” following FCC action. Nothing in Utah Code Ann. § 54-8b-3(8) requires, contemplates, or supports the initiation of a separate, substantive proceeding to reexamine the facts or merits of a discontinuance already approved by the FCC. To the contrary, the statute directs that the Commission “shall recognize and adopt” the FCC’s findings, reflecting a legislative intent to avoid duplicative review and regulatory delay. Requiring a new docket or evidentiary process at the state level would therefore be inconsistent with the plain language of the statute, undermine the streamlined federal framework established by the Legislature and create unnecessary regulatory burden and uncertainty for future discontinuances. The Commission’s role is defined and guided by statute, i.e., to acknowledge and implement the FCC’s determination, not to relitigate it.

#### **5. Conclusion**

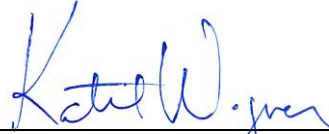
For the foregoing reasons, CenturyLink respectfully requests that the Commission:

1. Acknowledge the Division’s finding that CenturyLink’s actions comply with applicable law;
2. Confirm that discontinuance authority is governed by the FCC pursuant to 47 U.S.C. § 214(a); and

3. Clarify that, consistent with Utah Code Ann. § 54-8b-3(8), no separate state proceeding is required beyond recognition and adoption of the FCC's discontinuance findings.

Dated this 23<sup>rd</sup> day of March 2026

Respectfully submitted,



---

Katie N. Wagner, OK Bar #33296  
Senior Corporate Counsel  
CenturyLink  
(405) 669-8712  
[katie.wagner@lumen.com](mailto:katie.wagner@lumen.com)  
Attorneys for Qwest Corporation dba  
CenturyLink

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing, ***CENTURYLINK'S RESPONSE COMMENTS***, was sent via Email to the following parties on the date indicated below:

**City of Springdale**

Barbara Bruno, Mayor..... [bbruno@springdale.utah.gov](mailto:bbruno@springdale.utah.gov)

**Utah Assistant Attorneys General**

Patricia Schmid ..... [pschmid@agutah.gov](mailto:pschmid@agutah.gov)

Patrick Grecu..... [pgrecu@agutah.gov](mailto:pgrecu@agutah.gov)

Robert Moore ..... [rmoore@agutah.gov](mailto:rmoore@agutah.gov)

**Division of Public Utilities**

Madison Galt ..... [mgalt@utah.gov](mailto:mgalt@utah.gov)

**Office of Consumer Services .....** [ocs@utah.gov](mailto:ocs@utah.gov)

Alyson Anderson ..... [akanderson@utah.gov](mailto:akanderson@utah.gov)

Cameron Irmas ..... [cirmas@utah.gov](mailto:cirmas@utah.gov)

Asami Kobayashi ..... [akobayashi@utah.gov](mailto:akobayashi@utah.gov)

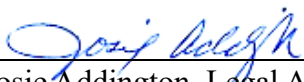
Jennifer Ntiamoah ..... [jntiamoah@utah.gov](mailto:jntiamoah@utah.gov)

Bella Vastag..... [bvastag@utah.gov](mailto:bvastag@utah.gov)

Alex Ware ..... [aware@utah.gov](mailto:aware@utah.gov)

DATED this 23<sup>rd</sup> day of March 2026.

**CENTURYLINK**

By:   
Josie Addington, Legal Assistant