

May 5, 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 Commission Order**

Dear Mr. Widerburg:

Attached for filing is CenturyLink's Response to Commission's April 27, 2026 Order.

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 TO COMMISSION'S APRIL 27, 2026, ORDER**

COMES NOW, Qwest Corporation d/b/a CenturyLink QC ("CenturyLink"), by and through undersigned counsel, respectfully submits this Response to the Order issued by the Utah Public Service Commission ("Commission") on April 27, 2026 ("Order"). While CenturyLink provides the information below in good faith and in the interest of administrative efficiency, CenturyLink respectfully maintains that its planned discontinuance has already satisfied all applicable federal and state legal requirements and does not require further substantive approval or process by the Commission.

**I. PRELIMINARY STATEMENT**

CenturyLink's discontinuance of legacy voice (POTS) service in the Springdale, Utah wire center has been authorized pursuant to federal law under Section 214 of the Communications Act, as implemented by the Federal Communications Commission ("FCC"). The FCC discontinuance became effective on April 9, 2026. The FCC process provided an opportunity for interested parties to raise objections or concerns at the federal level. No such objection prevented the application from becoming effective. Under recently amended Utah law, including Utah Code Ann. §§ 54-8b-2.3(11) and 54-8b-3(8), the Commission's role is limited to recognizing and adopting the FCC's discontinuance findings. The statute does not contemplate additional evidentiary proceedings,

discretionary review, or independent substantive conditions on discontinuance. Accordingly, CenturyLink respectfully submits that the discontinuance is not subject to further approval and that the Commission may not delay or deny implementation once the FCC authorization has been granted. To the extent the Commission's Order suggests otherwise, CenturyLink respectfully disagrees as a matter of law. Nevertheless, and without waiving any rights or objections, CenturyLink provides the following responses.

## **II. RESPONSE TO ORDER**

- a. The Commission ordered CenturyLink to “explain the apparent inconsistency between the positions taken by CenturyLink in the Discontinuance Letter and the FCC Application as it relates to the CenturyLink Replacement Service.”**

In summary, there is no inconsistency. The two statements address different issues and have been conflated. The FCC filing concerns whether discontinuance affects the availability of 911 services (it does not), while the customer notice explains that replacement services may require backup power at the customer premises to function during an electrical power outage. These are distinct concepts.

CenturyLink's FCC application addressed whether the discontinuance would affect public safety, emergency service, or 911 circuits. It will not because CenturyLink is not discontinuing dedicated public safety circuits. As for the CenturyLink Replacement Service, earlier this year, in CenturyLink's first FCC discontinuance application based on the availability of the CenturyLink Replacement Service, CenturyLink certified, per FCC requirements, that the service complies with all applicable regulations regarding the availability and required functionality of 911 service,<sup>1</sup> and

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<sup>1</sup> See Section 63.71 Application of Qwest Corporation d/b/a CenturyLink QC, WC Docket No. 26-8, at 28 (filed Jan. 7, 2026) (CenturyLink Kenansville, FL Discontinuance Application) (citing *Technology Transitions et al.*,

with all applicable 911 network reliability requirements.<sup>2</sup> Moreover, CenturyLink specified that although service providers are no longer required to certify compliance with the FCC’s now-sunset backup power rule,<sup>3</sup> the Air-Line adapter is compatible with an external 24-hour battery backup that enables voice services, including 911 services, when the power goes out, meaning that CenturyLink would meet this requirement if it still existed.<sup>4</sup> Customers also will continue to have access to emergency services through a variety of available alternatives, including but not limited to wireless services, VoIP offerings with backup solutions, and any other facilities-based or over-the-top providers.

The customer discontinuance letter addressed a different and practical issue: if a customer elects to use an electricity-dependent replacement service, such as the CenturyLink Replacement Service, the customer will need backup power for that service to function during a commercial power outage. Without sufficient power to the customer’s equipment, the customer will not be able to place outbound calls, including 911 calls, using that particular service during the outage. The Discontinuance Letter accurately explains that certain replacement services, like all IP-based or electricity-dependent services, require customer-provided backup power to function during a commercial power outage. This disclosure is consistent with industry practice and federal consumer disclosure expectations. Those points are not inconsistent. The discontinuance does not eliminate 911 access or discontinue 911 facilities. Rather, as with many modern voice technologies, a customer’s ability to use an electricity-dependent service during an outage may

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Declaratory Ruling, Second Report and Order, and Order on Reconsideration, 31 FCC Rcd 8283, 8329-30, ¶ 128 and nn.339-42 (2016). On February 13, 2026, the FCC granted the application, citing CenturyLink’s Connected Voice with Air-Line service as an adequate replacement under the FCC’s Adequate Replacement Test.

<sup>2</sup> *See id.* at 29 (citing 47 CFR § 9.19).

<sup>3</sup> The FCC’s battery backup requirements sunset on September 1, 2025. *See* 47 CFR § 9.20(g) (2024).

<sup>4</sup> *See* CenturyLink Kenansville, FL Discontinuance Application at 28.

depend on backup power at the customer premises. CenturyLink further notes that the FCC fully considered these issues in granting the discontinuance and did not impose any additional requirements.

**i. Connected Voice with Air-Line**

Specific to CenturyLink's replacement service, Connected Voice with Air-Line supports the use of battery backup solutions to help maintain voice service during power outages. When paired with a backup power unit, Air-Line will continue operating, allowing customers to place calls, including 911 calls. Battery backup options provide an added layer of resilience by supporting service during interruptions to commercial power. The length of continued service depends on the battery, usage, and proper maintenance. Customers are informed of these details and strongly encouraged to choose and maintain a backup option that fits their needs to help ensure ongoing access to voice services during outages.

**b. The Commission ordered CenturyLink to “state whether CenturyLink intends to offer the CenturyLink Replacement Service, or any other service to Springdale, Utah wire center customers, under tariff or as a price-listed service.”**

With respect to tariff or price list status, CenturyLink does not intend to offer CenturyLink Connected Voice or Connected Voice Air-Line as a tariffed or price-listed legacy telecommunications service in Utah. These replacement offerings are interconnected VoIP services and are not subject to traditional state legacy telephone tariffing or price-list regulation. *See*, Utah Code Ann. § 54-19-103(1) (“A state agency and political subdivision of the state may not, directly or indirectly, regulate Internet protocol-enabled service or voice over Internet protocol service.”)

This approach is consistent with the broader federal regulatory framework applicable to VoIP. VoIP services are interstate and inseverable in nature, and state regulation of such services is significantly constrained by federal law. States may retain authority only in narrow circumstances, such as generally applicable consumer protection or public safety matters, and only where such regulation does not interfere with interstate communications or federal policy.

That is to say, states are preempted from adopting any significant regulation of VoIP. Similarly, and regardless of whether VoIP is classified as an information service or a telecommunications service, it is also a wholly inseverable interstate service (at least in any form that CenturyLink delivers it) and therefore states have no jurisdiction or authority to regulate it via any type of state legacy telephone regulation or otherwise in any significant manner. States can only act to regulate VoIP if they act in their traditional role in general policing matters or to regulate with respect to a hypothetical discrete intrastate component of VoIP – and only where doing so does not unduly frustrate or interfere with interstate communications. Even in this activity, consistent with the FCC’s historic preemption rulings in a variety of contexts, states may only conceivably regulate VoIP only after developing a substantial record and, even then, only in very limited ways well beyond the periphery of traditional legacy telephone company regulation.

Accordingly, CenturyLink respectfully submits that the CenturyLink Replacement Service is not required to be included in a Utah tariff or price list. CenturyLink further submits that the tariff or price-list status of the replacement service does not alter the Commission’s obligation under Utah Code Ann. §§ 54-8b-2.3(11) and 54-8b-3(8) to recognize and adopt the FCC’s discontinuance findings.

- c. **Commission ordered CenturyLink to “provide more details concerning, as represented in the CenturyLink Guidance Request, the specific outreach and engagement efforts CenturyLink has undertaken with the existing Springdale, Utah wire center customers, including the results of those efforts in terms of people signing up for the CenturyLink Replacement Service or any other CenturyLink service.”**

- i. **Outreach**

CenturyLink has undertaken customer and local outreach efforts intended to support a smooth transition for affected Springdale customers. CenturyLink engaged directly with local officials in the affected area, including the mayors of Springdale and Rockville, to provide information, address concerns, and offer support during the transition. CenturyLink spoke with and followed up in writing with both mayors. These communications included detailed explanations of the CenturyLink Replacement Service (Air-Line), provision of informational materials, and offers to conduct in-person demonstrations for local officials and community members.

In Springdale, CenturyLink spoke with Mayor Barbara Bruno on April 1, 2026. During that conversation, the mayor indicated she would follow up with residents who had expressed concerns regarding wireless coverage and may request a demonstration of the Air-Line service. CenturyLink provided additional written information following the call and later supplemented those materials with further product literature. The mayor expressed general understanding of the transition but emphasized the importance of ensuring customers are supported and informed.

In Rockville, CenturyLink engaged with Mayor Pam Leach through multiple communications. After an initial outreach on April 1, 2026, Mayor Leach returned the call on April

3, 2026. CenturyLink also provided detailed follow-up materials describing the Air-Line service, including how it operates using LTE wireless connectivity with automatic failover across multiple national carrier networks, as well as additional educational resources and product documentation.

CenturyLink further provided address-level information (without customer-identifying data) to assist local officials in identifying potentially affected residents and responded to follow-up inquiries regarding pricing and service functionality. CenturyLink also offered to attend a city council meeting to provide a live demonstration of the Air-Line device and answer questions; local officials ultimately declined that offer after distributing the provided materials to residents. These outreach efforts reflect CenturyLink's ongoing commitment to ensuring that local officials and customers are informed, supported, and aware of available service options during the transition.

**ii. Transition**

With regard to customer transition efforts, CenturyLink provides this information to respond to the Commission's order, but does not concede that Utah law requires this level of customer-by-customer transition reporting before the Commission recognizes and adopts the FCC's discontinuance determination. The total affected Springdale customers at the time of the FCC 214 discontinuance filing is 42. As of April 30, 2026, the number of customers who have already voluntarily disconnected is 16. The number of customers migrated to CenturyLink Replacement Service is 2. The number of customers remaining that will be disconnected upon approval by the Commission is 24.

- d. The Commission ordered CenturyLink to “explain in detail the competitive options (including pricing) available to existing Springdale, Utah wire center customers, using location-specific information.”**

CenturyLink respectfully objects to any implication that Utah law requires CenturyLink to conduct a recurring, detailed competitive pricing survey as a precondition to discontinuance. The FCC discontinuance process does not impose such a requirement, and Utah law does not create one. CenturyLink provides the above information solely to respond to the Commission’s order and to facilitate recognition and adoption of the FCC’s discontinuance determination.

CenturyLink understands that customers in the Springdale wire center have access to competitive alternatives, including wireless service, fixed wireless service, VoIP services, and other broadband-enabled voice options. Based on available public information, including the FCC Broadband Map, the three major wireless carriers (Verizon Wireless<sup>5</sup>, AT&T Wireless<sup>6</sup>, and T-Mobile<sup>7</sup>) provide service in the area. In addition, customers with broadband access may obtain voice service through VoIP providers such as Ooma<sup>8</sup>, Vonage<sup>9</sup>, or similar services. The area also has broadband and/or fixed wireless availability from providers including South Central Connect<sup>10</sup> and InfoWest<sup>11</sup>. Pricing information is publicly available from provider websites and varies based on plan, equipment, taxes, fees, promotions, and customer-specific eligibility.

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<sup>5</sup> <https://www.verizon.com/plans/>

<sup>6</sup> <https://www.att.com/plans/wireless/>

<sup>7</sup> <https://www.t-mobile.com/cell-phone-plans/talk-text-only-plan>

<sup>8</sup> <https://www.ooma.com/home-phone-service/basic/>

<sup>9</sup> <https://www.vonageforhome.com/plans/>

<sup>10</sup> <https://www.southcentralconnect.net/faqs/what-is-the-voice-service-pricing/>

<sup>11</sup> <https://infowest.com/service/infowest-voice/>

- e. **The Commission ordered CenturyLink to “state all specific facts CenturyLink relies on in claiming it satisfies its statutory obligations under Utah law for discontinuance of service in the Springdale, Utah wire center, and make a formal request for the PSC to act in accordance with that law.”**

CenturyLink relies on the following facts to support compliance with Utah law:

1. CenturyLink filed the required discontinuance application with the FCC.<sup>12</sup>
2. The FCC process allowed interested parties, including the Commission, to object or comment. The Mayors of Springdale and Rockville, Utah filed comments, raising concerns about the Air-Line alternative, given its reliance on wireless service.<sup>13</sup>  
CenturyLink filed reply comments on March 27, 2026 explaining how the Air-Line solution works, including 911 access, and detailing information about Air-Line’s \$30/month service, as well as the availability of other service alternatives.<sup>14</sup>
3. The FCC raised no concerns regarding CenturyLink’s response. The FCC application became effective on April 9, 2026.
4. Utah Code Ann. § 54-8b-3(8) directs the Commission to recognize and adopt the FCC’s discontinuance findings.
5. Utah law does not authorize the Commission to impose additional substantive conditions, require an evidentiary proceeding, or deny discontinuance after the FCC discontinuance process has concluded.

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<sup>12</sup> See Section 63.71 Application of Qwest Corporation d/b/a CenturyLink QC, WC Docket No. 26-55, <https://www.fcc.gov/document/domestic-technology-transition-discontinuance-application-filed-11> (filed March 2, 2026).

<sup>13</sup> Comments of Barbara Bruno, Mayor of Springdale and Pam Leach, Mayor of Rockville, WC Docket No. 26-55 (filed March 16, 2026).

<sup>14</sup> Comments of CenturyLink, WC Docket No. 26-55 (filed March 27, 2026).

### III. RESERVATION OF RIGHTS

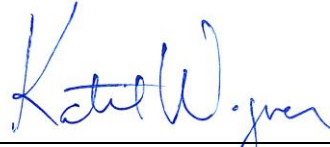
CenturyLink expressly reserves all rights, including the right to assert that any additional state-imposed requirements are preempted by federal law.

### IV. CONCLUSION

CenturyLink respectfully submits that it has satisfied all applicable legal requirements and that its discontinuance is lawful and effective. CenturyLink formally requests that the Commission promptly recognize and adopt the FCC's findings consistent with Utah law.

Dated this 5<sup>th</sup> day of May 2026

Respectfully submitted,



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CenturyLink

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing, ***CENTURYLINK'S RESPONSE TO COMMISSION'S APRIL 27, 2026, ORDER***, 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)

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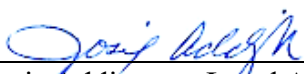
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DATED this 5<sup>th</sup> of May 2026.

**CENTURYLINK**

By:   
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Josie Addington, Legal Assistant