



CenturyLink™

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Via ECFS

July 30, 2018

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: *Applications Filed by Qwest Communications International Inc. and CenturyTel, Inc. d/b/a CenturyLink for Consent to Transfer Control; CenturyLink Broadband Deployment Semi-Annual Report, WC Docket No. 10-110*

Dear Ms. Dortch:

In a meeting with Wireline Competition Bureau staff on June 25, 2018, we discussed the data CenturyLink filed on May 9, 2018 in the above-captioned docket regarding the broadband deployment commitments made in connection with the Commission's review of the transfer of control of Qwest to CenturyLink.¹ Following up on the discussion from that meeting, CenturyLink hereby provides some additional information about the addressable living unit locations in the legacy Qwest footprint that do not have access to broadband service by CenturyLink of at least 1.5 Mbps downstream.²

As of April 1, 2018, there were 1,363,917 locations in the legacy Qwest footprint that did not have access to at least 1.5 Mbps broadband from CenturyLink. Nearly all of these locations, however, are in census blocks with multiple other broadband providers offering service at much higher speeds.³

¹ Letter from Jeffrey S Lanning to Marlene H. Dortch (ex parte notice), *Applications Filed by Qwest Communications International Inc. and CenturyTel, Inc. d/b/a CenturyLink for Consent to Transfer Control*, WC Docket No. 10-110 (June 27, 2018).

² We also take this opportunity to note that 232,323 (73%) of the 316,342 CAF I and CAF II locations in the Qwest footprint that currently have access to CenturyLink broadband service of at least 1.5 Mbps were broadband enabled without CAF funding, and only later upgraded using CAF support.

³ See Table A. Census blocks are the smallest area by which the Commission tracks broadband availability. While the availability of a broadband service in a census block, as reflected in the Form 477 data, does not mean that all locations in that census block have access to broadband from that provider, it provides a good proxy for broadband availability to those locations.

According to the Commission's Form 477 data, more than half (57%) are in census blocks served by a cable operator, which offer broadband services starting at 60 Mbps. In addition, almost three-quarters (73%) of the locations are in census blocks served by a fixed wireless broadband (*i.e.*, WISP) provider, which generally offer service packages starting at 20 Mbps. Nearly all (97%) of these locations are in census blocks served by at least one, and as many as four facilities-based mobile wireless providers, which offer broadband with speeds between 5 Mbps and 12 Mbps using 4G LTE. Finally, nearly all (98%) of these locations without access to CenturyLink broadband are also in census blocks with one or two satellite broadband providers, which offer services starting at 25 Mbps.⁴ Putting this all together, one should reasonably conclude that (1) all but a very small number of locations without access to at least 1.5 Mbps from CenturyLink are in census blocks with at least two providers of faster broadband;⁵ (2) at least 65% are in census blocks with at least three other providers; and (3) at least 25%, and probably as much as 50%, are in census blocks with 4-8 providers of broadband offering speeds at least 3 times as fast, and frequently 40 times faster.⁶

Pursuant to Section 1.1206(b) of the Commission's rules, this submission is being filed in the above-referenced docket. Please contact me if you have any questions.

Sincerely,



Copies via email to: Kris Monteith, Daniel Kahn, Terri Natoli, Pam Megna, Jaclyn Rosen, Mason Shefa, Joel Rabinovitz

Table A also shows the number of relevant census blocks that are eligible for the upcoming CAF II auction.

⁴ *Id.* It also appears that around 20% of these locations are in census blocks with at least one additional wireline provider, which usually is another local exchange carrier (they typically only report one of fiber or copper, depending on what they have deployed). While most of these instances likely are cases where a census block is split among two or more LEC serving areas, at least some of these are instances of competitive overbuilding.

⁵ *Id.* Only 46 of the 1.3 million locations are in census blocks with no broadband provider.

⁶ *Id.* These calculations are derived mathematically from the percentages in Table A. Even if there were the least possible overlap, at least 95% of the locations would be in census blocks with both mobile wireless and satellite. Similarly, at least 30% of the locations would be in census blocks with both cable and WISP providers.

Table A - Availability of Alternative Broadband for Locations Not Served by CenturyLink

	Number of Locations	Percent of Unserved	Eligible for Auction
Locations w/out Access to 1.5 Mbps	1,363,917		
In CB w/ Satellite	1,333,931	97.8%	33,278
In CB w/ Mobile Wireless	1,325,584	97.2%	32,384
In CB w/ WISP	997,358	73.1%	19,393
In CB w/ Cable	777,178	57.0%	355
In CB w/ Wireline Copper	153,874	11.3%	3,750
In CB w/ Fiber	149,153	10.9%	942
In CB w/ Other Wireline	1,432	0.1%	
In CB w/ No Provider	46	0.0%	