

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Petition of USTelecom for Forbearance Pursuant)	
to 47 U.S.C. §160(c) to Accelerate Investment in)	WC Docket No. 18-141
Broadband and Next-Generation Networks)	
)	

**CALIFORNIA INTERNET, L.P. DBA GEOLINKS SUPPORT FOR
MOTION FOR SUMMARY DENIAL**

California Internet, L.P. DBA GeoLinks (“GeoLinks” or the “Company”) supports the Motion for Summary Denial filed on August 6, 2018 (“Motion”), by INCOMPAS, FISPA, the Midwestern Association of Competitive Communications (“MACC”), and the Northwest Telecommunications Association (collectively, the “Competitive Carriers Group”)¹ and urges the Commission to deny the petition for forbearance from legacy unbundled network elements (“UNEs”) and Section 251(c)(4) resale obligations filed by USTelecom – the Broadband Association (“USTelecom”) (“Petition”).²

In the Petition, USTelecom claims that today’s “highly competitive marketplace” justifies removal of certain mandates, as set forth in the Telecommunications Act of 1996 (“1996 Act”).³ However, as the Motion notes, “the *Qwest Phoenix Forbearance Order* requires a separate examination of product markets and geographic markets with differing competitive conditions to determine whether the ILEC-specific local competition requirements remain necessary and in the public interest.”⁴ Despite this requirement, the Petition fails to provide information regarding

¹ *Motion for Summary Denial of INCOMPAS*, WC Docket No. 18-141 (filed Aug. 6, 2018) (“Motion”).

² *Petition of USTelecom for Forbearance Pursuant to 47 U.S.C. § 160(c) to Accelerate Investment in Broadband and Next-Generation Networks*, WC Docket No. 18-141 (filed May 4, 2018) (“Petition”).

³ See e.g. Petition at 29.

⁴ See *Petition of Qwest Corporation for Forbearance Pursuant to 47 U.S.C. §160(c) in the Phoenix, Arizona Metropolitan Statistical Area*, Memorandum Opinion and Order, 25 FCC Rcd. 8622 (2010) (“*Qwest Phoenix Forbearance Order*”).

local competition and “does not even acknowledge the existence of separate geographic markets.”⁵ In fact, the word “rural” is not used once in the entire Petition.

As GeoLinks noted in its comments opposing the Petition (“Opposition”), USTelecom fails to provide the market-by-market analysis necessary to demonstrate the availability of competitive alternatives to unbundled UNEs.⁶ Because USTelecom fails to assess differing competitive conditions in various geographic markets (or any geographic market), as required by the *Qwest Phoenix Forbearance Order*,⁷ and fails to show how the forbearance requested would serve the public interest, GeoLinks agrees with the Competitive Carriers Group that the Commission should deny summarily the Petition.⁸

Respectfully submitted,

GEOLINKS, LLC

/s/ Skyler Ditchfield, Chief Executive Officer
/s/ Melissa Slawson, General Counsel/ V.P of Government
Affairs and Education

September 5, 2018

⁵ Motion at 4.

⁶ See Opposition of California Internet, L.P. DBA GeoLinks, WC Docket No. 18-141 (filed August 6, 2018), at 3.

⁷ See Motion at 7.

⁸ Motion at 1.