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While Centurylink's filing, among the others from ILECs, paints a very bleak picture for incumbent phone service, it's very important to note that 83% of broadband additions in the third quarter of 2014 went to cable subscribers according to <http://www.leichtmanresearch.com/press/111814release.html>. Given the ever increasing amount of bundling that the industry pushes, and as per the recent CDC surveys, the steadily decreasing number of consumers who desire to get rid of their landline service, it's likely that the reason for the lack of interest in the ILEC's phone service has more to do with lack of awareness in the technological differences and the promotional price point than a lack of interest in fixed line telephony altogether.

Also quite worrying is Centurylink's suggestion that they should be able to shut down their networks if an alternative is available. Recently, ILECs have used this against state PUCs, and when asked what alternatives are around, simply point to a wireless carrier and a cable provider. This is the standard line used to prepare to exit less profitable markets with state regulators. Therefore, while Centurylink hints at fiber investment, the vast majority of subscribers will likely be outright abandoned rather than upgraded. In the words of Tom Wheeler, "More competition would be better" - not less.

Thank you for your consideration.