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EX PARTE

*Electronic Filing via ECFS*

April 28, 2009

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

Re: *In the Matter of a National Broadband Plan for Our Future*, GN Docket No. 09-51

Dear Ms. Dortch:

On April 28, 2009, Steve Davis and Melissa Newman of Qwest met with Nick Alexander, Legal Advisor to Commissioner Robert McDowell, to discuss the above-captioned proceeding.

The attached document was used as the basis for discussion.

This *ex parte* is being filed electronically pursuant to 47 C.F.R. §§ 1.49(f) and 1.1206(b). Please contact me at 202.429.3120 if you have any questions.

Sincerely,

/s/ Melissa E. Newman

Attachment

Copy via email to:  
Nick Alexander



## **Qwest GN Docket No. 09-51**

### **Qwest background**

- Local exchange carrier and broadband provider in 14 mid-western and western states: Arizona, Colorado, Idaho, Iowa, Minnesota, Montana, Nebraska, New Mexico, North Dakota, Oregon, South Dakota, Utah, Washington, and Wyoming.
- Service area covers 272,000 square miles.
- As of December 31, 2008, Qwest provided 11.6 million voice-grade access lines and 2.8 million broadband lines.
- Qwest currently has broadband available to 86 percent of its customer base.
- 42 percent of Qwest's switching centers are located outside of metropolitan areas.
- 13 percent have a local loop density of fewer than 10 access lines per square mile.

### **Broadband NOI**

- Qwest supports Commission's focus on access to broadband.
  - The highest priority of any National Broadband Plan should be to expand nation's broadband footprint to unserved areas.
  - Communities without access to broadband are at a decided economic (as well as public safety, educational and health) disadvantage to served communities.
  - Deployment to unserved areas will promote the goals of the Recovery Act including advancing: consumer welfare; civic participation; public safety and homeland security; community development; health care delivery; energy independence and efficiency; worker training; private sector investment; entrepreneurial activity; and job creation and economic growth.
  - Significant broadband deployment to unserved areas in Qwest's service territory is not economically feasible at this time without government grant funding.
- It is important to collect data sufficient to measure progress.
  - A true broadband strategy should incorporate benchmarks, deployment timetables, and measurable thresholds to gauge progress.
  - Since both NTIA and FCC have duties to fulfill concerning the collection of data under the Recovery Act and the Broadband Data Services Improvement Act, NTIA and FCC should endeavor to achieve as much consistency and overlap in their approaches to data collection as possible.
  - Data collection for the baseline broadband inventory map should be substantially the same, if not identical.
- Private sector will be a key partner in driving a National Broadband Plan.
  - Qwest has a lengthy history of providing reliable and advanced communications services to diverse communities.
  - Entities like Qwest are the most capable of quickly undertaking broadband construction projects that will create and retain jobs, stimulate local and regional economies, and deliver sustainable and affordable broadband service to currently unserved areas.