



CenturyLink™

Jeffrey S Lanning  
Assistant Vice President -  
Federal Regulatory Affairs  
1099 New York Ave, NW, Suite 250  
Washington, DC 20001

Voice: (202) 429-3113  
Fax: (913) 397-3649  
[jeffrey.s.lanning@centurylink.com](mailto:jeffrey.s.lanning@centurylink.com)

October 20, 2011

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

**SUBMISSION FOR THE RECORD**

*Re: Connect America Fund, WC Docket No. 10-90; A National Broadband Plan for Our Future, GN Docket No. 09-51; Establishing Just and Reasonable Rates for Local Exchange Carriers, WC Docket No. 07-135; High-Cost Universal Service Support, WC Docket No. 05-337; Developing an Unified Intercarrier Compensation Regime, CC Docket No. 01-92; Federal-State Joint Board on Universal Service, CC Docket No. 96-45; Lifeline and Link-Up, WC Docket No. 03-109; Universal Service Contribution Methodology, WC Docket No. 06-122; Numbering Resource Optimization, CC Docket No. 99-200; Implementation of the Local Competition Provisions in the Telecommunications Act of 1996, CC Docket No. 96-98; Intercarrier Compensation for ISP-Bound Traffic, CC Docket No. 99-68; IP-Enabled Services, WC Docket No. 04-36.*

Dear Ms. Dortch:

The signatories to the ABC Plan filed on July 29, 2011 in the above-captioned dockets,<sup>1</sup> file this submission to the record to demonstrate the trade-off between upload speeds and broadband availability. If higher upload speeds are required, fewer locations will receive broadband, particularly in the very high-cost census blocks that would receive support under the Connect America Fund (CAF). This analysis was conducted using the model created by CostQuest that has been filed in the above-captioned dockets. The speed results (measured from the DSLAM to the NID, and not to the modem) are presented in the following table.

| Available Speed (down/up)   | 12 Mbps/<br>1 Mbps | 6 Mbps/<br>1 Mbps | 4 Mbps/<br>768 Kbps |
|---|--------------------|-------------------|---------------------|
| Supported Locations (cumulative totals in 1000s)                    | 197                | 417               | 4200                |
| Currently Unserved Supported Locations (cumulative totals in 1000s) | 125                | 319               | 2200                |

<sup>1</sup> Letter from Robert W. Quinn, Jr., AT&T, Steve Davis, CenturyLink, Michael T. Skrivan, FairPoint, Kathleen Q. Abernathy, Frontier, Kathleen Grillo, Verizon, and Michael D. Rhoda, Windstream, to Marlene H. Dortch, FCC, CC Docket Nos. 01-92, 99-200, 96-98, 99-68; WC Docket Nos. 05-337, 07-135, 10-90, 03-109, 06-122, 04-36; GN Docket No. 09-51 (filed July 29, 2011).

The modeled length of loop used to serve each customer location is the primary factor for these projected speeds. This analysis does not account for the possibility of using techniques such as using different DSL protocols and chip sets, or using two copper loops for a connection (pair bonding) to provide higher speeds to some locations. Such techniques are not included in the model, and would add additional cost which, in turn, would produce fewer served locations given a fixed budget for high-cost universal service support. Nor does this analysis account for technological innovation, which has been increasing available speeds over the past decade. While higher speeds would be available with a fiber-to-the-premise architecture (or fiber-to-the-node), such construction would: require far greater capital expenditure; connect substantially fewer unserved homes; and necessitate a longer period of support or a shorter period for recovery of capital investment than was contemplated in the ABC Plan.

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

Sincerely,

A handwritten signature in cursive script, appearing to read "Jeffrey S Lanning".

Jeffrey S Lanning

cc: Amy Bender  
Sharon Gillett  
Zachary Katz  
Carol Matthey  
Steve Rosenberg  
Michael Steffen