

## CenturyLink Has No Case For Waiver Wants Program Changed To Satisfy Own Agenda

Chuck Siefert, CEO of the Montana Internet Corporation (MIC), a WISP, **argues CenturyLink has no case**, and is attempting to modify the rules to accomplish its own objectives rather than adhering to the original goals of the program — to deliver broadband to the rural *unserved*:

CenturyLink is simply raising an old protest in a new venue. Having been designated as eligible for almost ninety million dollars of the Connect America Program (CAP), it wishes to have the opportunity to use more than a third of that as it chooses, rather than as the Commission designated after input and analysis from all parties. The Rubicon has been crossed with respect to this issue: unserved areas are those that are not served by fixed wireless providers.

Regardless of CenturyLink's opinion of the quality of service provided, these areas have been deemed served by the Commission and CAP incremental support may not be used to build out broadband in these areas. CenturyLink is certainly capable of using other funding to build out in these areas; the Commission has not precluded that.

CenturyLink's complaints that WISPs often come with data usage caps is ironic because **CenturyLink is now imposing usage caps on its own broadband service**. CenturyLink argues data caps expose the limitations inherent in wireless broadband in their filing with the FCC:

Satellite broadband also often comes encumbered with restrictive data caps. The same is true of many of the WISPs subject to this waiver request. They impose on their users highly restrictive data caps of less than 25 GB per month. Indeed, two of the WISPs impose a cap of just 5 GB per month.

It is no surprise that these WISPs would impose such unusually low caps; like satellite providers, they must ration out their highly constrained capacity among the various end users who compete for it. WISP broadband capacity—unlike the customer-specific links in DSL-based broadband—is shared by all customers within a given wireless cell or sector.

This means that the more customers a WISP persuades to sign up, the worse the average service quality gets for all customers unless the WISP sharply limits how much customers may consume.

That imperative may be an unavoidable consequence of the WISPs' technology, but it further underscores the need to give the affected consumers a robust broadband alternative.

Siefert claims CenturyLink's assertions about the quality of its DSL service, pricing, and performance simply fall short of the truth, and MIC does better by its customers.