



CenturyLink™

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November 30, 2012

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 10-90; A National Broadband Plan for Our Future, GN Docket 09-51; Establishing Just and Reasonable Rates for Local Exchange Carriers, WC Docket 07-135; High-Cost Universal Service Support, WC Docket 05-337; Developing an Unified Intercarrier Compensation Regime, CC Docket 01-92; Federal-State Joint Board on Universal Service, CC Docket 96-45; Lifeline and Link-Up, WC Docket 03-109; Universal Service Reform – Mobility Fund, WT Docket 10-208.*

Dear Ms. Dortch:

CenturyLink hereby files supplemental documentation illustrating the approach used in Appendix B of CenturyLink's Petition for Waiver, filed on June 26, 2012 (Petition) to demonstrate that several wireless Internet service providers (WISPs) were not offering service to residential customers at the time the Petition was filed.

CenturyLink personnel reviewed the June 2011 NTIA maps (which the Commission had specified for this analysis) of fixed wireless service at 768kbps download speed for overlap with areas where CenturyLink could deploy broadband using CAF 1 Incremental Support. Based on the maps, all overlapping WISPs were identified (a total of approximately 700 WISPs).

CenturyLink personnel searched the web site of each of the overlapping WISPs in the weeks prior to the filing of the waiver on June 26, 2012. The following items were attempted to be identified and stored for each WISP:

- Company Profile or Company Description
- Residential products offered and price
- Business products offered and price
- Installation and equipment prices
- Data speeds, data capacity limitations, additional data charges
- Are contracts required or is month-to-month service available
- Acceptable use policy
- Customer agreements
- Limitations on service (e.g. line of sight limitations, capacity limitations)

From the company profile, description, and the list of residential products, six WISPs offering only business products, were identified:

- Airband Communications (AZ)
- Airband Communications (IA)
- airPowered (FL)
- ERF Wireless (TX)
- Freewire Broadband (OR)
- Southwestern Wireless

Screen shots for each of the companies' web sites were saved, and copies of those screen shots are submitted with this filing.

Sincerely,



Jeffrey S Lanning

cc: Michael Steffen  
Carol Matthey