

1 **BEFORE THE PUBLIC UTILITY COMMISSION**
2 **OF OREGON**

3 **UM 1908 / UM 2206**

4 In the Matter of

5 LUMEN TECHNOLOGIES,

6 Proposed Commission action Pursuant to
7 ORS 756.515 to Suspend and Investigate
8 Price Plan (UM 1908), and

9 QWEST CORPORATION,

10 Investigation Regarding the Provision of
11 Service in Jacksonville, Oregon and
12 Surrounding Areas (UM 2206)

RESPONSE TO BENCH REQUEST

13 CenturyLink respectfully submits these responses to the Bench Requests issued by Judge
14 Spruce on November 17, 2023.

15 Bench Requests:

16 1-1. Refer to Stipulating Parties/100, Beitzel-Gose/26 and CenturyLink/200, Gose/5-6, 8. In the
17 joint testimony, Staff and Lumen note that there are 15 locations that will not receive the fiber
18 roll out, only one of which is a CenturyLink customer. In CenturyLink/200, Gose/5-6, Mr. Gose
19 identifies 15 locations as extremely high cost locations, but also identifies approximately 72
20 customers served by the 2600 and 2900 remote terminals that are outside the RDOF build.

21 Please:

22 (a) confirm the number of Jacksonville and Little Applegate customers that are covered by the
23 Jacksonville Orders that will not receive access to fiber at the completion of the RDOF project as
24 currently planned; and

25 (b) explain any distinctions between the 15 locations and the 72 customers served by the 2600
26 and 2900 remote terminals.

1 Response to Bench Requests:

2 1-1 (a)

3 At the time joint testimony was prepared in UM 1908, UM 2206, there were 82 CenturyLink
4 voice customers served from the remote terminals located at 2600 Upper Applegate Road and
5 2900 Little Applegate Road. Of those 82 customer locations, 72 are not located within the
6 Census blocks designated for subsidy by the FCC under the Rural Digital Opportunity Fund
7 program. As set forth in reply testimony, CenturyLink is actively studying the possibility of
8 seeking grant funding under the American Rescue Plan Act to bring fiber to the premise of many
9 more locations in rural areas south of Jacksonville.

10 1-1 (b)

11 The distinctions between the 15 extremely high cost locations that will not be built and the 72
12 customers served by the 2600 Upper Applegate Road and 2900 Little Applegate Road remote
13 terminals are as follows. Eight of the 15 locations that will not be built are approximately 15
14 miles south of the 2600 Upper Applegate Road remote terminal and none of those locations are
15 served by either remote terminal at 2600 Upper Applegate Road or 2900 Little Applegate Road.
16 Likewise, seven of the 15 locations that will not be built are approximately 11 miles north of the
17 2900 Little Applegate Road remote terminal and none of those locations are served by either the
18 remote terminal at 2600 Upper Applegate Road or 2900 Little Applegate Road. Additionally,
19 only one of the 15 locations that will not be constructed is presently a CenturyLink customer,
20 whereas all 72 customer locations served off the 2600 and 2900 remote terminals are currently
21 CenturyLink customers. An additional distinction is that the 72 customer locations that will not
22 receive fiber to the premise will still benefit from the installation of fiber transport facilities,
23 whereas not all of the 15 other locations will.

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1 DATED: December 5, 2023

PERKINS COIE LLP

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