

## Attachment M

Qwest Corporation d/b/a CenturyLink QC  
Bennington Exchange NBBP/CPF Grant Application

The following notice of defects was received on 3/13/2024 and response/resolution is noted as a sub bullet to the defect/concern.

### General defects or concerns:

- General Review Comments:
- Project Area Follow-up: Overlaps Cox Communications 2022 NBBP Awards - Cox County Rd 33-1 and 33-2. Applicant reports 60 locations are already served. Is this accurate? CPF funding can only be used for unserved and underserved locations. Please revise the cost of the project
  - **Response:** There does appear to be a slight overlap with the Cox 2022 NBBP award according to the NBBP Mapping site. From our records it appears this is potentially 5 of 116 locations. CenturyLink QC believes it may be an inaccuracy in Cox's shapefile. Cox did not issue a notice of intent to challenge or formal challenge regarding this overlap. Additionally, removing these locations would not change the cost of the project due to the fiber route which is required to serve nearby locations. Regarding served locations included in the project area, while the FCC BDC reporting indicates 60 of 116 locations are served by fixed wireless, CenturyLink QC has not seen any significant migration off our copper network that would indicate there is a reliable fixed wireless offering in the project area. 39 locations in the project area currently subscribe to CenturyLink QC's copper broadband offering which provides less than 20/1 Mbps or less speeds. CenturyLink's intent, if awarded is to build a reliable fiber to the premise broadband network that would provide speeds up to 940/940 Mbps to all locations in the project area.
- Technical Follow-up:
- Financial Follow-up:
- Legal Capability Follow-up:
- Digital Inclusion Plan Follow-up: DIP indicates that applicant will provide 200 symmetrical service to ACP customers. But that "actual results can differ based on network congestion and/or capabilities of customer provided equipment. There are not set minimum speeds for the offering." Please review the requirements for the DIP and resubmit.
  - **Resolution:** Attachment J has been revised/resubmitted to clarify current status of ACP and no set minimum speed for ACP allows approved participants to apply the ACP credit to any current speed offering
- Rates Follow-up: The application indicates a monthly customer rate for proposed 100/100 Mbps service (non-promo rate) of \$92.24. However, the Attachment F does not include this \$92.24 rate but instead indicates the company currently offers 500/500 Mbps for \$50/mo with a "price for life" option. The attachment also references a commitment to price at or below the FCC's 2024 urban rate survey for the 5-year commitment period. The company's website for Centurylink reflects \$55/mo for the up to 100Mbps "Simply Unlimited Internet" option & \$75/mo for the up to 940 Mbps "Fiber Internet" option. The Quantum fiber website reflects a rate of \$50/mo for the Up to 500 Mbps & \$75/mo for the 940 Mbps option. Please elaborate on

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the rates to be offered in the proposed service area upon completion and throughout the 5-year commitment period.

- **Response:** CenturyLink QC agrees to keep a price at or lower than the FCC's 2024 urban rate survey benchmark for 100/20 Mbps service for the 5-year commitment period for our lowest tier speed service that meets or exceeds 100/20 Mbps. While the FCC's 2024 urban rate survey benchmark for 100/20 Mbps service is \$92.24 as shown in attachment F and this is the amount we used in the application, the Q Fiber brand services we will be marketing doesn't currently include a 100/20Mbps service. The Q Fiber price offerings in attachment F highlight that the current pricing for the proposed grant area is the same as all areas we serve nationally. CenturyLink QC would be glad to present its current offerings for the symmetrical 500Mbps service as the Attachment F price. However, CenturyLink QC cannot commit to keeping the current national price offerings for 5 years.
- Match Follow-up:
- Fixed Wireless Follow-up:
- Authorities Follow-up:
- Public Private Partnership (PPP) Follow-up: