

## Attachment M

Qwest Corporation d/b/a CenturyLink QC  
St Paul - Cushing 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: Overlaps areas in Centurylink's NUSF-99 St. Paul project and AMG CAF.
  - **Response:** CenturyLink's NUSF-99 St. Paul project was completed under legacy program parameters at 10/1 Mbps thus the areas completed are now considered unserved. The overlap related to the AMG CAF appears instead to be Great Plains ACAM I. Upon review of FCC BDC reporting, it does not appear the ACAM I recipient built to served speeds as the area is considered un/under served based on currently available FCC BDC data. Additionally, if the recipient is still completing the grant build it appears the program requirements are 10/1 Mbps with uplift to 25/3 Mbps thus would still be considered un/underserved.
- Project Area Follow-up:
- 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 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

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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: