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NUSF 99.09

September 6, 2018

Mr. Mike Hybl
Executive Director
Nebraska Public Service Commission
1200 N Street, Suite 300
Lincoln, NE 68508

Re: Application No. NUSF-99

Dear Mr. Hybl:

Pursuant to the Commission's Order entered July 12, 2016 in Application No. NUSF-99, CenturyLink is pleased to submit an application for the extension of proposed broadband services to unserved and underserved exchange areas. CenturyLink's proposed broadband project is located in its Valentine serving area.

The Commission has identified several attachments which are to be included with each application. CenturyLink has included Attachments A and B with its broadband deployment proposal and has clearly marked the information in its submission it considers to be confidential and trade secret. A redacted paper copy of the application will be provided to the Commission for public distribution.

Please contact me if you have any questions regarding this application.

Sincerely,

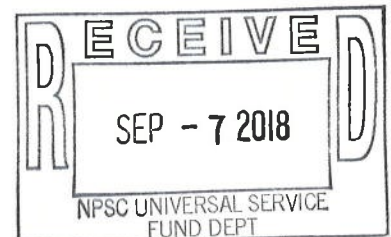
A handwritten signature in black ink that reads "Ann Prockish".

Ann C. Prockish

ACP/bardm

Enclosures

PUBLIC DOCUMENT
TRADE SECRET DATA HAS BEEN EXCISED



NEBRASKA UNIVERSAL SERVICE FUND
NUSF-99 2017 BROADBAND APPLICATION
QWEST CORPORATION d/b/a CENTURYLINK QC

Valentine

- 1. A description of the proposed broadband project including download/upload speed capabilities which can be provided and a description of the proposed network infrastructure to be deployed.**

This project would deploy the fiber and electronics necessary to provide broadband service at speeds up to 1 gigabit to approximately 345 living units in 358 census blocks in rural areas of CenturyLink's Valentine exchange. The project will deploy fiber to the home for those property owners in the project area that choose to receive the service. This project will also make the needed upgrades to the central office for the deployment of broadband.

The project will be completed in three phases. The South route will begin in 2019 and should be completed by the end of 2020. The East route will begin in 2020 and be completed by the end of 2021. Finally, the South Dakota route will begin in 2021 and be completed by the end of 2022.

This project is unprecedented in its size and scope. The project area covers approximately 1,500 square miles and covers some very rural and sparsely populated areas. CenturyLink estimates that at least 2 million feet of fiber will be required. In addition, the drops to many of the living units in the project area can be several thousand feet long. For these reasons, CenturyLink requests additional latitude with this application.

CenturyLink does not wish to waste the limited resources of the NUSF fund deploying fiber broadband service to living units when it is not wanted. Therefore, CenturyLink requests that it be allowed to survey the customers in the project area to determine interest in receiving CenturyLink's fiber broadband service. Those customers that choose not to receive broadband service will not have a fiber drop placed to their home or business. Should that customer choose to receive CenturyLink fiber broadband service later, that customer will be required to pay for the construction costs associated with the fiber drop. In addition, CenturyLink requests that it be allowed to require those customers which request a fiber drop to commit to receiving CenturyLink service for a minimum of two years.

Once CenturyLink determines which customers are interested in CenturyLink's broadband service, it will determine the most cost-effective design for the deployment of the fiber and electronics.

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Twenty-three of the census blocks in the project area are CAF II eligible; however, CenturyLink has chosen not to use CAF II funds to build out to these census blocks. The FCC, in the *USF/ICC Transformation Order*, said that “[i]n meeting its obligation to serve a particular number of locations in a state, an incumbent that has accepted the state-level commitment may choose to serve some census blocks with costs above the highest cost threshold instead of eligible census blocks (i.e. census blocks with lower costs), provided that it meets the public interest obligations in those census blocks, and provided that the total number of unserved locations and the total number of locations covered is greater than or equal to the number of locations in the eligible census blocks.” (para. 171, fn 279). The FCC further affirmed this flexibility in the April 2014 order (para. 32) and the December 2014 order (para. 33).

Further, the FCC acknowledged that there could be discrepancies between the number of locations it found in the eligible census blocks and the actual number locations. In the December 2014 order, the FCC stated, “At the outset, we note that there may be some variance between the number of funded locations as specified by the forward-looking cost model adopted by the Bureau and the actual number of locations in a given area. For instance, the price cap carrier model utilizes GeoResults study area boundaries, which in some instances may be inaccurate, which in turn may result in the inaccurate assignment of certain locations to a particular price cap territory. The model also utilizes GeoResults business location data, which in some instances may be inaccurate in terms of either business counts or actual physical locations; this in turn may result in too many or too few locations in a given census block. While these minor inaccuracies should cancel one another out in most instances across multiple census blocks, we recognize that in particular areas that may not be the case, and the total number of locations assigned to a particular price cap carrier in a given state according to the model simply does not necessarily reflect the actual number of locations. We also recognize that there may be a variety of unforeseen factors, after the initial planning stage, that can cause significant changes as a network is actually being deployed in the field, and a variety of factors that can affect the time needed to deploy a planned route. Finally, we note that the customer location data utilized in the model reflect location data at a particular point in time. The precise number of locations in some funded census blocks is likely to change over time for a variety of reasons, which may impact the orderly progress of the planned construction cycle.” (December 2014 Order, para. 38)

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The FCC, therefore, allows price cap carriers the flexibility to deploy to less than 100 percent of the locations in CAF II eligible census blocks. "Given all of these factors, rather than requiring deployment to 100 percent of funded locations as identified by the model in a given state, we will permit a modest adjustment to the number of model-determined funded locations in a given state with a corresponding reduction in support in certain instances. Price cap carriers taking advantage of this flexibility will be required to refund support based on the number of required locations without access to broadband." (December 2014 Order, para. 39).

In this particular case, CenturyLink has chosen not to use CAF II funding to deploy broadband in these CAF II eligible census blocks. By reallocating the CAF II dollars to other eligible CAF II areas, CenturyLink will be able to use the available funding more efficiently and deploy broadband service to more living units in other eligible areas.

2. **A list in Excel Format of all the census blocks where broadband facilities would be deployed for the proposed project, which shall include 2010 Census Block identification numbers of service area, by project.**

Please see Attachment A.

3. **An estimate of the number of potential new broadband subscribers for each project.**

Approximately 345 households may be impacted by this project. None of these households can receive broadband service from CenturyLink currently. CenturyLink believes that no other wireline internet service provider is providing service in the project area. The FCC Form 477 report indicates that some census blocks in the project area, primarily along the exchange border, show that wireline broadband service is available. CenturyLink believes the exchange boundary bisects these census blocks and that broadband service is only available to those areas on the non-CenturyLink side of the census block.

4. **An estimated schedule for broadband deployment.**

Because of the significant size of this project, CenturyLink requests additional time to complete the construction. CenturyLink plans to complete the project in phases. Work on the South route will begin upon approval of the application, then CenturyLink will move on to the East route and then the South Dakota portion. Completion of the entire project, barring unforeseen delays, should be completed by the end of 2022.

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Once CenturyLink receives Commission approval for this project, it will contact the subscribers to determine interest in CenturyLink's fiber based broadband service and request a two-year service commitment from those customers. After CenturyLink has ascertained which customers are interested, it will begin work on the design of the project, including the necessary field notes.

- 5. A proposed budget, showing total project costs, in electronic format, with a detailed breakdown of the cost elements and a depreciation schedule showing the life of the investment.**

Please see confidential Attachment B. The information in this attachment represents CenturyLink's current best estimate of the cost of this project. However, the cost could vary significantly depending on the number of customers that opt to receive CenturyLink's fiber based broadband service as well as unforeseen problems. CenturyLink reserves the right to make additional applications for funding for this project.

The total cost of this project exceeds the amount of NUSF support that CenturyLink currently has available to it for broadband grant projects. CenturyLink respectfully requests that it be allowed to apply 2019 NUSF broadband grant support to this project in addition to the available funding.

- 6. Proposed retail pricing, including both monthly recurring costs and nonrecurring costs for the new broadband service(s) to be offered. At a minimum the pricing should reflect the stand alone price for the speeds to be offered to the customer.**

The retail pricing for the proposed project area will be the same as the retail pricing for broadband services in CenturyLink's service territory in Nebraska. The pricing will vary depending on the speed the subscriber chooses as well as any other services the subscriber may wish to bundle with the broadband service.

CenturyLink's current pricing internet only service is as follows:

Speed Tier	Price
1.5-25 meg	\$45.00
40-80 meg	\$55.00
100-140 meg	\$65.00
200 meg-1 gig	\$85.00

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A modem is required and can be leased from the company for \$10.00 per month, or purchased for a one-time cost of \$100.00, plus shipping and handling charges. If the subscriber chooses to have a technician install the service, there is a one-time charge of \$60.00.

Because of the significant costs associated with this project, CenturyLink will ask those customers that indicate an interest in CenturyLink's fiber based broadband service during the initial show of interest to commit to subscribing to CenturyLink's broadband service for a minimum of two years.

- 7. The company's commitment to offer broadband services to all households within the service area of the project for a minimum of five (5) years.**

CenturyLink commits to offering broadband service to all households in the project area for a minimum of five years.

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8. An affidavit from the company attesting 1) (a) that the area of the proposed project is a CAF II eligible area and has not refused CAF II funding, or (b) that the area of the proposed project is ineligible for CAF II funding. 2) That the company has done its due diligence to verify that comparable broadband does not already exist in the area of the proposed project. 3) The truth and accuracy of all information included in the project filing.

State of Kansas)
) ss.
County of Johnson)

I, Al Lubeck, being duly sworn on oath, state that (1) the area of the proposed project is not in a CAF II eligible area; (2) upon information and belief comparable broadband service is not available from another wireline provider; and (3) the information provided in this application are true and correct to the best of my knowledge, information and belief.



Al Lubeck

SUBSCRIBED AND SWORN TO this 5th day of September, 2018





**ATTACHMENT A
VALENTINE**

CLLI8	Project	Census Block
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**ATTACHMENT A
VALENTINE**

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**ATTACHMENT A
VALENTINE**

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**ATTACHMENT A
VALENTINE**

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VLNTNNE	Valentine	310319559001114

**ATTACHMENT A
VALENTINE**

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ATTACHMENT B

HAS BEEN REDACTED