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BEFORE THE ARIZONA CORPORATION COMMISSION

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Arizona Corporation Commission

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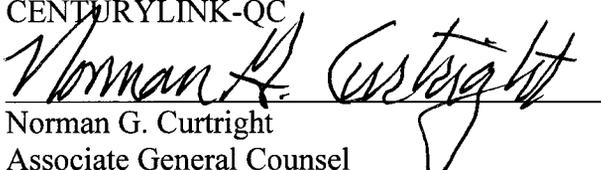
IN THE MATTER OF THE APPLICATION OF QWEST CORPORATION D/B/A CENTURYLINK-QC ("CENTURYLINK") TO CLASSIFY AND REGULATE RETAIL LOCAL EXCHANGE TELECOMMUNICATIONS SERVICES AS COMPETITIVE, AND TO CLASSIFY AND DEREGULATE CERTAIN SERVICES AS NON-ESSENTIAL

DOCKET NO. T-01051B-11-0378
CENTURYLINK'S SUBMISSION DEMONSTRATING CONTINUED COMPETITION FOR VOICE SERVICES, QUALIFYING FOR TERMINATION OF CONDITIONS ON COMPETITIVE CLASSIFICATION APPROVED IN DECISION NO. 73354

Qwest Corporation d/b/a CenturyLink QC ("CenturyLink"), pursuant to Arizona Corporation Commission ("Commission") Opinion and Order, Decision No. 73354, hereby files the attached submission, contemplated by Section 2.4 of the Settlement Agreement approved in Decision No. 73354, demonstrating that competition for voice services in Arizona is the same or greater than the levels CenturyLink's testimony and evidence claimed existed at the time of the filing of the Application in this docket. Under provision of the Decision No. 73354, Staff or interested parties shall file any objections to this filing within 30 days of this submission. Absent objection, with Staff verification that the criteria in Section 2.4 are met, the conditions on competitive classification expire six months from the date of this filing, with no further action required by the Commission.

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RESPECTFULLY SUBMITTED, this 23rd day of February, 2015.

QWEST CORPORATION d/b/a
CENTURYLINK-QC

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ORIGINAL and thirteen (13) copies filed
this 23rd day of February, 2015, with:

Docket Control
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ARIZONA COMPETITIVE REPORT

2-20-15

Introduction

In Decision 73354, released on August 21, 2012, the Commission approved a settlement reached by CenturyLink, the Arizona Corporation Utilities Staff ("Staff"), the Residential Utility Consumer Office ("RUCO") and the Arizona Investment Council in Docket T-01051B-11-0378 (In the Matter of the Application of Qwest Corporation dba Century Link QC to Classify and Regulate Retail Local Exchange Telecommunications Services as Competitive and to Classify and Deregulate Certain Services as Nonessential). Section 2.3 of the Settlement Agreement states:

CenturyLink will file semi-annual reports with the Commission, Staff, and RUCO for a period of three years, commencing six months after the date of the Order Approving Settlement, setting forth data to be agreed with Staff and RUCO showing the state of competition in the State.

In addition, Section 2.4 of the Settlement Agreement specifies the competitive information that will be used to evaluate whether competition remains vibrant in the Arizona telecommunications market in the future:

After the expiration of at least 30 months from the date of the Order Approving Settlement, CenturyLink may make an additional submission in this docket, demonstrating that competition for voice services in Arizona is the same or greater than the levels CenturyLink's testimony and evidence claim exist at the time of the filing of the Application in this docket. CenturyLink's additional submission shall be based on competitive reports, data and statistics, including but not limited to the National Center for Health Statistics Wireless Substitution Report, the Federal Communications Commission ("FCC") Local Competition Report, and the FCC Internet Access Services Report. CenturyLink in such filing shall demonstrate that:

- a. The percentage of consumers who have no landline voice connection as specified in the National Center for Health Statistics Report, shall be 30% or greater;
- b. Wireless connections, as set forth in the FCC's Local Competition Report, shall represent 65% or greater of total voice connections in Arizona; and

- c. Access to VOIP providers shall be measured by xDSL broadband availability in Arizona, as set forth in the FCC Internet Access Services Report, and shall be 88% of households or greater.

The purpose of this fifth semi-annual report is to report on the current status of these competitive indicators, in order to meet the requirements of Condition 2.3. As demonstrated below, the impact of competition in the Arizona telecommunications market continues to increase, as customers move from CenturyLink and other ILEC voice services, to wireless, cable/CLEC and other alternatives. CenturyLink retail access lines in Arizona declined from 890,503 in June 2014 to 845,249 in December 2014, representing an annualized decrease of more than 10%.

Most Recent Competitive Data

- A. *The percentage of consumers who have no landline voice connection as specified in the National Center for Health Statistics Report.*

In December, 2014 the National Center for Health Statistics (“NCHS”) released its most recent estimates of the percentage of households in the United States that have “cut the cord” and have only wireless telephones. For the time period of January-June 2014, the NCHS reported that 44.0% of American homes had only wireless service.¹ This represents a continued increase, from 41.0% in the previous study (July-December, 2013) and 33.4% in the study that was referenced in Docket T-01051B-11-0378 (July-December, 2011). As noted in the February 2014 and August 2014 Competitive Reports, In December 2013, the NCHS released its most recent state view of wireless substitution, and found that for the period January-December 2012, 41.2% of Arizona adults over 18 were living in households without wireline telephone service.² The NCHS previously found that for the period January-December 2011, 38.2% of Arizona adults over 18 were living in households with wireless only telephone service.³ The NCHS state-level report that was referenced in Docket T-01051B-11-0378, found that for the July 2009-June 2010 time period, 29.4% of adult Arizona wireless households were “wireless only.” Thus the level of “cord-cutting” in Arizona has continued to increase at a significant rate—from 29.4% in 2010 to 41.2% in 2012—and is well above the 30% level defined in the Settlement Agreement.

- B. *Wireless and Wireline connections, as set forth in the FCC’s Local Competition Report.*

¹ *Wireless Substitution: Early Release of Estimates From the National Health Interview Survey, January-June 2014*, Centers for Disease Control and Prevention, National Center for Health Statistics, released December 2014, p. 1.

² *Wireless Substitution: State-level Estimates From the National Health Interview Survey, 2012*, Centers for Disease Control and Prevention, National Center for Health Statistics, released December 18, 2013, Table 1.

³ *Wireless Substitution: State-level Estimates From the National Health Interview Survey, 2010-2011*, Centers for Disease Control and Prevention, National Center for Health Statistics, released October 12, 2012, Table 1.

The FCC released its most recent Local Competition Report in October 2014, reflecting December 2013 data. The last two columns in the table below provide the number (*in thousands*) of ILEC wireline, non-ILEC wireline and wireless connections in Arizona for December 2013, as well as the share percentages.⁴ For comparison purposes, this table also shows the number of Arizona connections (*in thousands*) and percentages for December 2011 and December 2012.

	December 2011		December 2012		December 2013	
ILEC	1,345	16.6%	1,224	14.8%	1,099	12.9%
Non-ILEC	1,228	15.1%	1,278	15.4%	1,380	16.3%
Wireless	5,532	68.3%	5,774	69.8%	6,007	70.8%

This table demonstrates that the wireless share of voice connections in Arizona continued to grow, and remains well above the 65% level defined in the Settlement Agreement. Also note that as of December 2013, non-ILEC wirelines continued to increase while ILEC wirelines declined.

C. xDSL broadband availability in Arizona, as set forth in the FCC Internet Access Services Report

The FCC released its latest Internet Services Report in October 2014, reflecting data as of December 31, 2013. As described in the February 2014 Competitive Report, *the FCC no longer provides the percent of xDSL availability for local telephone customers or the percent of cable modem availability for local cable customers in Arizona (formerly in Table 22 of the report).* Therefore, we cannot update the percentage of xDSL broadband availability for this report.

The latest FCC Internet Services Report does however include other data that demonstrates the growth of broadband, including the number of ADSL and Cable Modem connections. The table below shows the increase in ADSL and Cable Modem connections (at least 200 kbps) in Arizona between December 2011 and December 2013 (*in thousands*).⁵ Each of these subscribers has a high speed internet connection that can be used for the provision of Voice over Internet Protocol (“VoIP”) service, which serves as a substitute for traditional voice services.

⁴ *Local Telephone Competition: Status as of December 31, 2013*; Industry Analysis and Technology Division, Wireline Competition Bureau, October 2014, tables 9 and 18.

⁵ *Internet Access Services: Status as of December 31, 2013*, FCC Industry Analysis and Technology Division, Wireline Competition Bureau, October 2014 Tables 19 and 20.

	Dec. 2011	Dec. 2012	December 2013
ADSL	589	620	649
Cable Modem	1,169	1,210	1,253
Total*	1,713	1,759	1,902

*Does not include fiber or wireless connections. As of December 2013, there were 3,954,000 Broadband connections in Arizona.⁶

Respectfully submitted,



Robert Brigham
Director - Regulatory Operations
CenturyLink

⁶ *Id.*, table 17.