



MARK BRNOVICH  
Attorney General

Office of the Attorney General  
State of Arizona  
CIVIL LITIGATION DIVISION

JOSEPH SCIARROTTA, JR.  
Division Chief

November 17, 2020

**VIA U.S. MAIL AND EMAIL**

Ryan McManis  
Vice President and Deputy General Counsel  
Lumen Technologies  
931 14<sup>th</sup> Street, 9<sup>th</sup> Floor  
Denver, Colorado 80202

Re: Arizona Fiber Optic Infrastructure Investment

Dear Mr. McManis:

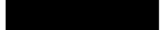


I write to confirm CenturyLink's (n/k/a Lumen Technologies) commitment to invest in fiber optic infrastructure in locations throughout Arizona. Pursuant to the Consent Judgment entered on March 12, 2020, CenturyLink is required to invest, within 24 months of March 12, 2020, \$2 million in fiber optic infrastructure across Arizona that were decided upon in coordination with the Attorney General's Office ("AGO").

In selecting the locations, Attorney General Brnovich sought investments that will benefit law enforcement, small businesses, and consumers in underserved rural areas. Accordingly, the AGO would like to move forward with the following prioritized projects:<sup>1</sup>

| Project Name  | Project Description  | Customers Benefitted   | Estimate of Project Costs |
|---------------|--|--|---------------------------|
| Sonoita-Elgin | Upgrading the network from Sierra Vista to Patagonia and Elgin to support Optical Wave Services which will greatly increase speeds | <ul style="list-style-type: none"> <li>➤ Schools</li> <li>➤ US Customs &amp; Border Patrol</li> <li>➤ Santa Cruz County</li> <li>➤ Approximately 112 small businesses</li> <li>➤ Positive impacts to approximately 15,000 consumers</li> </ul> | [REDACTED]                |

<sup>1</sup> If there are any remaining amounts after completing the projects, the AGO would like the monies to go toward bringing fiber to cell towers that were previously on copper/microwave, which will improve cell coverage and data throughputs for consumers seeking to upgrade to faster speeds up to and including 5G.

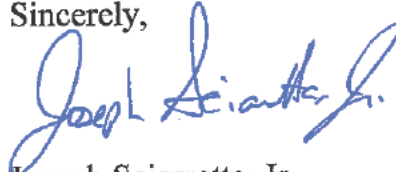
| <b>Project Name</b>              | <b>Project Description</b>  | <b>Customers Benefitted</b>  | <b>Estimate of Project Costs</b> |
|----------------------------------|---|--|----------------------------------|
| <p>Sedona – Oak Creek Canyon</p> | <p>Augmentation of the fiber network from Sedona to Oak Creek Canyon with 6.6 miles of 144-strand fiber which will allow for greater speeds and service to additional consumers</p> <ul style="list-style-type: none"> <li>➤ Enables Business to receive Gigabit Internet Services and supports Consumer DSL Growth</li> <li>➤ Increasing route capacity from Sedona to Oak Creek Canyon which is at or near capacity, limiting provision of additional orders or new services</li> <li>➤ Also supports a new cell tower in the canyon which will provide greater cell coverage and increased data throughputs for consumers</li> </ul> | <ul style="list-style-type: none"> <li>➤ Approximately 50 small businesses</li> <li>➤ Positive impacts to thousands of consumers, especially with the addition of the new cell tower being erected by a third-party cellular provider</li> </ul> | <p>██████████</p>                |
| <p>Stanfield – Casa Grande</p>   | <p>Upgrading the network from Stanfield to Casa Grande to support Optical Wave Services which will greatly increase speeds</p> <ul style="list-style-type: none"> <li>➤ Enables Schools, Government, and Business to receive Gigabit Internet Services</li> <li>➤ Previously these areas were restricted to slower speeds; this upgrade provides newer technology and potential for faster speeds</li> </ul>  | <ul style="list-style-type: none"> <li>➤ Pinal County</li> <li>➤ Stanfield School District</li> <li>➤ Approximately 30 small businesses</li> <li>➤ Positive impacts to approximately 2,000 consumers</li> </ul>                                  | <p>██████████</p>                |

| Project Name  | Project Description   | Customers Benefitted   | Estimate of Project Costs   |
|---|---|--|---|
| Whitlow – Queen Valley                                | <p>Augmenting the fiber network from Whitlow to Queen Valley with 3.2 miles of 144-strand fiber which will allow for greater speeds and service to additional consumers.</p> <ul style="list-style-type: none"> <li>➤ Enables Business to receive Gigabit Internet Services and supports Consumer DSL Growth</li> <li>➤ Increasing route capacity which is currently limiting provision of additional orders or new services</li> <li>➤ Also supports a new cell tower in the canyon which will provide greater cell coverage and increased data throughputs for consumers</li> </ul> | <ul style="list-style-type: none"> <li>➤ Approximately 35 small businesses</li> <li>➤ Positive impacts to thousands of consumers, especially with the addition of the new cell tower being erected by a third-party cellular provider</li> </ul> |    |
| Page-Flagstaff  | <p>Leasing additional lit fiber services for 3 years with renewal rights from Page – Flagstaff which will provide for diversity for 911 services and augment existing Microwave Radio system</p>  | <ul style="list-style-type: none"> <li>➤ Police / Fire / EMT</li> </ul>  |  |
| Wilhoit – Towers Mountain / Crown King Public Library | <p>Augmenting fiber infrastructure with Ethernet enabled Microwave Radio System which will greatly increase speeds</p> <ul style="list-style-type: none"> <li>➤ Enables Crown King Public Library with 100Mb MOE service</li> <li>➤ Existing TDM Microwave Radio network from Wilhoit to Towers Mountain is at or near capacity</li> </ul>  | <ul style="list-style-type: none"> <li>➤ Crown King Public Library</li> <li>➤ Positive impacts to thousands of consumers in connection with upgrades also being provided by a third-party cable provider</li> </ul>                              |  |

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Please acknowledge CenturyLink's agreement to the above listed projects by signing in the space below and returning the executed letter to my attention. As CenturyLink's investment materializes, please keep us advised as to the progress of these important investments for Arizona citizens. Through our collaboration, high-speed internet connectivity is being maximized in areas most in need.

Sincerely,



Joseph Sciarrotta, Jr.  
Division Chief Counsel  
Civil Litigation Division

AGREED to and SUPPORTED by:

Lumen Technologies f/k/a  
CenturyLink, Inc.;  
Qwest Corporation;  
CenturyLink Communications, LLC;  
Qwest Broadband Services, Inc.

By:



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Ryan McManis  
Vice President and Deputy General Counsel  
Lumen Technologies

cc: Marcy M. Heronimus, Lumen Assistant General Counsel  
Jason Isaak, Advisor to the Attorney General  
Matthew du Mée, AGO Acting Consumer Protection & Advocacy Section Chief  
Jennifer Bonham, AGO Assistant Attorney General