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April 4, 2018

VIA ELECTRONIC FILING

M. Lynn Jarvis, Chief Clerk
North Carolina Utilities Commission
4325 Mail Service Center
Raleigh, North Carolina 27699-4325

Re: Blue Ridge Electric Membership Corporation v. Charter Communications
Properties, LLC
Docket No. EC-23, Sub 50

Dear Ms. Jarvis:

Carolina Telephone and Telegraph Company LLC d/b/a CenturyLink, Central Telephone Company d/b/a CenturyLink, and MebTel, Inc. d/b/a CenturyLink (all collectively “CenturyLink”) write to express their support for the positions advocated by Charter Communications Properties, LLC (“Charter”) in this proceeding.

As does Charter, CenturyLink must rely on existing utility pole networks owned by electric and telephone utilities to provide services. As previously noted by CenturyLink in its *Amicus Curiae* Brief filed in Docket No. EC-43, Sub 88, *et al.*, excessive rates and burdensome contract terms are a concern for all pole attaching entities, including CenturyLink. Access to utility poles on just, reasonable and nondiscriminatory rates is essential to the expansion of broadband and other advanced services across North Carolina, especially in rural areas that may be unserved or underserved. Pole attachment fees can be one of the largest costs in reaching rural customers and are a key component in determining where and how far advanced services can be deployed. Given the similarity of the issues presented in the instant docket to those addressed by the Commission in Docket No. EC-43, Sub 88, *et al.*, CenturyLink respectfully requests that the Commission consider the arguments made in CenturyLink’s *Amicus Curiae* Brief in those dockets as being incorporated by reference into this proceeding.

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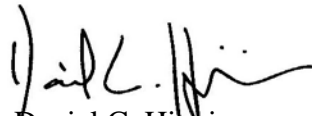
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CenturyLink supports Charter's positions regarding use of the FCC rate formulas in determining just and reasonable pole attachment rates and eliminating onerous attachment terms. These rates are compensatory and, as Charter notes, would promote consistency, uniformity and predictability in rates across the State, while also furthering other important policy objectives. CenturyLink looks forward to a Commission decision on this important matter.

Please share this letter with the Commission.

Sincerely yours,

BURNS, DAY & PRESNELL, P.A.

A handwritten signature in black ink, appearing to read "Daniel C. Higgins".

Daniel C. Higgins
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