

**BEFORE THE WASHINGTON  
UTILITIES AND TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION,

Complainant,

v.

CENTURYLINK COMMUNICATIONS,  
LLC

Respondent.

DOCKET UT-181051

DECLARATION OF  
LISA W. GAFKEN

1 Lisa W. Gafken hereby declares and states as follows:

2 I am an attorney for the Public Counsel Unit of the Washington Attorney General's  
Office (Public Counsel) in the above-captioned matter. This declaration supports Public  
Counsel's Motion for Partial Summary Determination.

3 The Washington Utilities and Transportation Commission (Commission) issued a  
complaint against CenturyLink Communications, LLC, alleging violations stemming from a 9-1-  
1 outage that occurred in December 2018.

4 Public Counsel, Commission Staff, CenturyLink Communications, LLC,  
TeleCommunication Systems, Inc. (Comtech), and the Washington Military Department E911  
Coordination Department (WMD) are parties to the above captioned matter. Parties have prefiled  
testimony and exhibits in this matter with the Commission.

5 Attached as Exhibit A is a true and correct copy of the Direct Testimony of Brian Rosen  
on behalf of Public Counsel, Exhibit BR-1CTr, filed with the Commission on December 15,  
2021 and revised on December 16, 2021.

6 Attached as Exhibit B is a true and correct copy of the Direct Testimony of Angela White

DECLARATION OF LISA W. GAFKEN  
DOCKET UT-181051

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ATTORNEY GENERAL OF WASHINGTON  
Public Counsel Unit  
800 5<sup>th</sup> Ave., Suite 2000  
Seattle, WA 98104-3188  
(206) 464-7744

on behalf of Public Counsel, Exhibit AW-1T, filed with the Commission on December 15, 2021.

7 Attached as Exhibit C is a true and correct copy of the Direct Testimony of David White  
on behalf of Public Counsel, Exhibit DW-1T, filed with the Commission on December 15, 2021.

8 Attached as Exhibit D is a true and correct copy of the Direct Testimony of Samantha  
Hovey on behalf of Public Counsel, Exhibit SH-1T, filed with the Commission on December 15,  
2021.

9 Attached as Exhibit E is a true and correct copy of the Direct Testimony of Victor  
Barajas on behalf of Public Counsel, Exhibit VB-1T, filed with the Commission on December  
15, 2021.

10 Attached as Exhibit F is a true and correct copy of Exhibit BR-4C sponsored by Brian  
Rosen on behalf of Public Counsel, filed with the Commission on December 15, 2021.

11 Attached as Exhibit G is a true and correct copy of the Testimony of Jacque Hawkins-  
Jones on behalf of Commission Staff, Exhibit JHJ-1CT, filed with the Commission on December  
15, 2021.

12 Attached as Exhibit H is a true and correct copy of Exhibit JHJ-3C sponsored by Jacque  
Hawkins-Jones on behalf of Commission Staff, filed with the Commission on December 15,  
2021.

13 Attached as Exhibit I is a true and correct copy of Exhibit BR-27 sponsored by Brian  
Rosen on behalf of Public Counsel, filed with the Commission on December 15, 2021.

14 Attached as Exhibit J is a true and correct copy of the Response Testimony of Stacy J.  
Hartman on behalf of CenturyLink Communications, LLC, Exhibit SJH-1CT, filed with the  
Commission on March 31, 2022.

15 Attached as Exhibit K is a true and correct copy of the Response Testimony of Steven E.  
Turner on behalf of CenturyLink Communications, LLC, Exhibit SET-1CT, filed with the  
Commission on March 31, 2022.

16 Attached as Exhibit L is a true and correct copy of Exhibit BR-28 sponsored by Brian  
Rosen on behalf of Public Counsel, filed with the Commission on December 15, 2021.

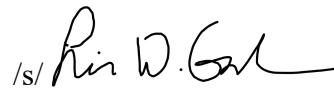
17 Attached as Exhibit M is a true and correct copy of Exhibit BR-32C sponsored by Brian  
Rosen on behalf of Public Counsel, filed with the Commission on August 31, 2022.

18 Attached as Exhibit N is a true and correct copy of an excerpt of the transcript of the  
Deposition of Steven E. Turner.

19 Attached as Exhibit O is a true and correct copy of the Cross-Answering Testimony of  
Brian Rosen on behalf of Public Counsel, Exhibit BR-30CT, filed with the Commission on  
August 31, 2022.

Signed at Seattle, Washington, this 28th day of October, 2022.

ROBERT W. FERGUSON  
Attorney General

/s/ 

LISA W. GAFKEN, WSBA No. 31549  
Assistant Attorney General, Unit Chief

*Attorney for Public Counsel Unit*

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