# **Exhibit B**

## **BEFORE THE WASHINGTON**

## **UTILITIES & TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,

Complainant,

v.

CENTURYLINK COMMUNICATIONS, LLC,

Respondent.

DOCKET UT-181051

DIRECT TESTIMONY OF ANGELA WHITE ON BEHALF OF THE WASHINGTON STATE OFFICE OF THE ATTORNEY GENERAL PUBLIC COUNSEL UNIT

#### **EXHIBIT AW-1T**

December 15, 2021

1	Q.	Please state your name, age, city of residence, and occupation.
2	А.	My name is Angela White. I am over 18 years old, and I live in Olympia,
3		Washington. I am currently employed by the Washington State Department of
4		Social and Health Services as a nurse aide and caregiver.
5	Q.	On whose behalf are you testifying?
6	А.	I am testifying on behalf of the Public Counsel Unit of the Attorney General's
7		Office. I was asked to testify about my experience during the more than two-day
8		outage of 911 service that occurred in December 2018.
9	Q.	What happened on December 27, 2018?
10	А.	On December 27, 2018, I was at home with my daughter Marissa White and
11		husband David White. About 6:45 am, I looked over and saw David try to stand
12		and he fell right over. He felt hot and sweaty to the touch. I called 911 on my cell
13		phone since that is the phone that works with my hearing aids. There was no
14		answer. I tried five tries more, then got a "beep, beep, beep" tone. In 1997, I
15		worked as a 911 dispatcher in Anchorage, Alaska, and I knew from that
16		experience that the "beep, beep, beep" tone meant a problem with the line. I
17		decided I would have to get David to the hospital myself.
18	Q.	Was it a challenge to get David to the hospital quickly?
19	A.	Yes. David weighed 320 pounds at the time. I had to get clothes on him, put him
20		on my back to drag him down our front steps, and together with our then 15-year-
21		old daughter Marissa, I walked him 50 feet to our F-150 pickup truck. He was just
22		responsive enough to be able to help pull himself up and into the passenger seat. I
23		drove along Kinwood to Martin Way, then to the St. Peters ER, talking to him the
24		whole time to assess his alertness, which seemed to come and go. I can't

1	remember exactly how long the drive took, but it usually takes about 20 minutes
2	to get from our house to the hospital. When I arrived at the ER, nobody was
3	around for me to flag down. I left David alone and went to the front desk to alert
4	staff. When I came back out to our truck, I saw that a doctor coming back from
5	break had spotted David alone in the passenger seat and had started attending to
6	him.

7

#### Q. What did you learn about David's condition?

8 A. David had suffered a blood pressure spike. Altogether, about six doctors worked 9 to get his blood pressure down from where it had risen by the time he arrived. By 10 then, it had reached about 300/180, which meant he was in shock mode. The 11 doctors said they had never seen somebody with blood pressure that high be able 12 to be nearly as responsive as David was. David was unable to use his right hand 13 properly. The doctors tested for stroke but found no evidence of one. David 14 reported seeing black spots with no vision. As a measure of how serious the 15 situation was, the hospital brought a chaplain to wait with me while the doctors 16 were working to lower David's pressure.

#### 17 Q. Were ER staff aware of the 911 outage in the area?

A. No, the ER had no clue that 911 was out. They told me they were wondering why
they did not have any patients. Eventually, the blog Thurston County Scanner,
News, and Weather was the first to put out the alert.

## 21 Q. Can you describe David's treatment progression in the hospital?

- A. After two days of David being treated in a bed in the hallway, he was moved into
  a room since his blood pressure still had not dropped safely. Since he remained
- 24 unable to use his right hand, I helped feed David during the week and a half he

was in the hospital. While there, David started getting migraines, and he still
 suffers from them. David was also diagnosed with glaucoma, and his kidney
 function became a concern.

### 4 Q. Did David's condition remain stable after he was discharged?

No. A couple of weeks later, David had a similar event to the one that happened 5 A. 6 during the outage. I called 911 and about four medics arrived. While I was 7 attempting to explain David's history, they were looking all around our house as 8 if they were appraising what kind of people David and I were. Rather than load 9 David onto a gurney, the medics forced David, then barely conscious, to stand up 10 and walk the 50 feet from the house to the ambulance. I later learned the medics 11 at some point apparently drug tested David with no notice. As my daughter 12 Marissa and I were leaving the house to follow the ambulance, she found the drug 13 test wrapper in my and David's bedroom. We live in a nice home with a nice 14 neighborhood, so I feel that there was no reason for any suspicion. Additionally, 15 911 had not been called to our address since we moved there in 2018.

16

Q.

What happened next?

A. The EMTs left for the hospital without activating their unit's emergency lights or siren. They either drove extra slowly or took the long way around to the hospital, since Angela and I arrived there before the EMTs did. The ER doctor grew angry when he learned the EMTs had not radioed to alert hospital staff to be ready to treat David on arrival. The ER treated David to lower his blood pressure. While he was in the hospital this second time, David's migraines continued, and he could not eat a thing.

1	Q.	Have these medical conditions cleared up since David's last hospitalization?
2	А.	No. I asked the doctors to prescribe the migraine medication Imitrex. They did,
3		but he got only brief relief from that. He saw neurologists who prescribed shots
4		that helped David, but now our insurance will not cover them, and we cannot
5		afford their out of pocket cost. David now gets migraines twice a week with no
6		relief of any kind available. David continues to have the kidney problems that
7		arose during the outage, vision problems including glaucoma, and vertigo on top
8		of the migraines.
9	Q.	Describe how you feel the outage affected your experience of these events.
10	А.	I believe, but will never know for sure, that prompt EMT treatment and transport
11		during the outage might have kept David's blood pressure from spiking as high as
12		it did by the time our daughter and I could finally get him to the hospital
13		ourselves. I also believe, but will never know for sure, that the subsequent
14		migraine, glaucoma, serious kidney trouble, and vertigo might have been lessened
15		or avoided altogether. I believe, but will never know for sure, that David's
16		subsequent, humiliating EMT treatment that our daughter and I had to witness
17		during his second trip to the hospital would never have been necessary.
18	Q.	Does this conclude your testimony?
19	А.	Yes.