

# **Exhibit E**

**BEFORE THE WASHINGTON  
UTILITIES & TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,

Complainant,

v.

CENTURYLINK COMMUNICATIONS, LLC,

Respondent.

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DOCKET NO. UT-181051

**DIRECT TESTIMONY OF VICTOR BARAJAS  
ON BEHALF OF THE  
WASHINGTON STATE OFFICE OF THE ATTORNEY GENERAL  
PUBLIC COUNSEL UNIT**

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**EXHIBIT VB-1T**

December 15, 2021

1       **Q.     Please state your name, age, city of residence, and occupation.**

2       A.     My name is Victor Barajas. I am over 18 years old, and I live in Pasco,  
3             Washington. I am currently employed by Wal-Mart Distribution.

4       **Q.     On whose behalf are you testifying?**

5       A.     I am testifying on behalf of the Public Counsel Unit of the Attorney General's  
6             Office. I was asked to testify about my experience during the more than two-day  
7             outage of 911 service that occurred in December 2018.

8       **Q.     What happened on December 28, 2018?**

9       A.     Around 1:40 am on December 28, 2018, I was driving to work on I-182  
10            westbound near Mile Marker 2 when I caught ice, hit the median, and rolled my  
11            vehicle three times.

12      **Q.     What is the next thing you remember?**

13      A.     The roof of my car was completely smashed, and my car had no power. I later  
14            found the battery had come loose. The highway was empty of other travelers due  
15            to the hour. I wondered if I might be in shock and did not want to risk movement.  
16            I remembered my phone had been in my pocket and found it was still there. I  
17            dialed 911, but got no ring or busy signal. I tried two or three times with the same  
18            result. I tried calling a few people in my contacts directory, but none answered  
19            due to the hour. I left a voicemail for my father in case he might check. I then  
20            realized my boss would be at work, so I called and got through to her. I let her  
21            know I couldn't get through to 911, and she said she would call the non-  
22            emergency line for me.

1       **Q.     What happened next?**

2       A.     After my boss and I hung up, my dad called and said he would come. My father  
3             arrived at the same time as the trooper responding to my boss's call. By now,  
4             about 30 minutes had gone by since my first attempt to call 911. By this time, I  
5             had regained confidence that I was not seriously injured, so my dad helped me out  
6             of the car and drove me to the emergency room to get checked over, where they  
7             found only minor bruises.

8       **Q.     How did you learn there was a system wide 911 outage?**

9       A.     Neither the trooper nor anyone at the hospital ever mentioned there was a 911  
10            outage. I never received an alert or message about an outage before or after my  
11            crash. I read about the outage days later, and had no idea the outage had lasted so  
12            long.

13      **Q.     Describe how you feel the outage affected your experience of these events.**

14      A.     I feel very lucky I was uninjured, my phone was undamaged, and the car did not  
15            catch fire with me trapped inside. Given the time of morning, with my contacts  
16            unlikely to answer their phones and worried I might be in shock, I felt a strong  
17            concern when I could not reach 911. I am very glad my boss was at her office  
18            already and able to use an alternate system to reach help. I am very disappointed  
19            to learn first-hand that no duplicate system existed that would take over if the  
20            regular 911 system failed.

21      **Q.     Does this conclude your testimony?**

22      A.     Yes.