

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION STAFF
RESPONSES TO DATA REQUESTS

DATE PREPARED: September 22, 2022
DOCKET: UT-181051
REQUESTER: CenturyLink

WITNESS: Commission Staff
RESPONDER: Commission Staff

CENTURYLINK DATA REQUEST NO. 32:

Does Mr. Akl believe it was “human negligence” by Comtech [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED] ? (see Exhibit SH-12C, pp. 8/92 – 10/92). If your answer is other than
yes, fully explain your response.

RESPONSE:

Staff objects to this request as overbroad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence, and/or not proportionate to the needs of the case. Staff further objects to this request to the extent it requests more than is required by the Commission’s rules and orders. Staff further objects that this request would improperly require the creation of new data and/or documents on the part of Staff. *See* WAC 480-07-400(1)(c)(iii). Staff further objects to this data request to the extent that the information it seeks is protected by attorney client privilege and/or the work product doctrine. Staff further objects to the data request to the extent that the Company is asserting/assuming the existence of facts. Staff further objects to this request to the extent it seeks speculative and/or hypothetical information. Staff further objects to this request to the extent that it is beyond the scope of Dr. Akl’s testimony.

Without waving the above objections, Staff responds as follows:

Dr. Akl’s opinions are in his testimony.