

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION STAFF
RESPONSES TO DATA REQUEST

DATE PREPARED: March 24, 2021
DOCKET: UT-181051
REQUESTER: CenturyLink

WITNESS: Jacque Hawkins-Jones
RESPONDER: Jacque Hawkins-Jones
TELEPHONE: (360) 664-1105

REQUEST NO. 2:

Excepting the materials appended to the Staff Report as Appendices G and M, and excepting Exhibits A and C sought by CTL-1:

- a. Identify and describe all information and documents requested by Staff from Comtech in conjunction with Docket UT-181051 (including the investigation that led to the filing of the complaint in Docket UT-181051 in December 2020) (the formal complaint proceeding and the investigation that preceded the formal complaint shall be collectively referred to as “the Docket”). If those requests were in writing, produce the written requests.
- b. Produce all information and documents furnished by Comtech to Staff in response to each request described in Staff’s response to CTL-2(a). Produce all other information and documents furnished by Comtech to Staff related in any way to the Docket.
- c. Produce all correspondence between Staff and Comtech related in any way to the Docket.
- d. Summarize each verbal communication Staff had with individuals from Comtech in conjunction with or related to the Docket. For each communication, identify the date and place of such communication, and provide a detailed summary of the contents of the communication. Produce all documents in Staff’s possession regarding those communications.

RESPONSE:

Objection: Staff objects to the request to provide all correspondence and communication with Comtech as overburdensome and cumulative of information already provided or available to CenturyLink. Subject to and without waiving the above objection, Staff provides the following response:

NO. 2(a) – Please find attached written data requests requested by Staff from Comtech – attached as **DR 2 Attachment A**.

NO. 2(b) – Please find attached all documents furnished by Comtech in response to each data request provided in response to No.2(a) above – attached as **DR 2 Attachment B (Confidential)**.

NO. 2(c) – Staff is still in the process of reviewing records for responsive material and intends to provide additional response by April 9.

No. 2(d) – On December 27, 2018, Staff contacted representatives of Comtech by telephone to state that both a UTC outage notification and FCC NORIS report must be filed with the UTC on the outage in progress. Staff spoke with Comtech regarding outage reporting process.