

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. 43:**

Refer to Table 3 of Exhibit JDW-1CT (beginning at page 55). For each of the calls Mr. Webber identifies as Failed, identify the error code associated with each such call. Refer to Mr. Klein's Response Testimony (Exhibit CDK-1CT), pages 11-12 for an identification and description of potential error codes.

**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 on the basis that the material sought by the request is: (a) not in Staff's possession, custody, or control; (b) already in the Company's possession, custody, or control; (c) publicly available; and/or (d) obtainable from some other source that is more convenient, less burdensome, or less expensive. 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 request to the extent that it is beyond the scope of Witness Webber's testimonies.

Without waving the above objections, Staff responds as follows:

See Witness Webber's August 31, 2022 Cross-Answering Testimony (Webber, Exh. JDW-33CT at 38:16 – 39:25) for Witness Webber's rebuttal of Witness Klein's testimony concerning failed calls to CenturyLink-served PSAPs during the December 2018 outage. See also, Witness Webber's workpapers provided on December 22, 2021.