

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. 35:

At page 7 of her Cross-Answer Testimony, Ms. Hawkins-Jones discusses factor 7 (likelihood of recurrence) of the Commission's enforcement criteria.

- a. Fully explain Staff's position that there is a likelihood of recurrence by CLC notwithstanding the fact that CenturyLink is no longer a 911 service provider in Washington.
- b. Fully explain Staff's position that there is a likelihood of recurrence by CLC notwithstanding the fact that the IGCC on Lumen's Infinera networks is now closed based on the actions taken by Infinera and CenturyLink following the December 2018 outage.

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 to this data request to the extent that the information it seeks is protected by attorney client privilege and/or the work product doctrine.

Without waving the above objections, Staff responds as follows:

- a. Staff response to factor 7 in Witness Hawkins-Jones's cross testimony was intended to dispute the rationale provided by CLC's witness, Stacy Hartman. For Staff's position, please refer to Staff's investigative report and the Commission's enforcement policy (Hawkins-Jones, Exh. JHJ-3C at 25; *In the Matter of the Enforcement Policy of the Washington Utilities and Transportation Commission*, Docket A-120061, Policy Statement (Jan. 7, 2013)); b. For Staff's position on likelihood of recurrence, please refer to Staff's previous testimony, Staff's investigative report and the Commission's enforcement policy (Hawkins-Jones, Exh. JHJ-1CT at 16:19-22; Hawkins-Jones, Exh. JHJ-3C at 25; *In the Matter of the Enforcement Policy of the Washington Utilities and Transportation Commission*, Docket A-120061, Policy Statement (Jan. 7, 2013)).