

APPENDIX A

[PDF=QWS4000_S_P_001_20170103_001_X0000270.PDF]

Your order date: 12-22-2016
Your order number: (4b)
Your account number: (4b)
Your 3-digit account code: 598

Your Order Confirmation

January 3, 2017

QWS4000_S_P_001_20170103_001_X00270



(4b)

VANCOUVER WA 98682

Order Details

Rates do not include applicable federal, state, county, or local taxes for your area. These taxes will apply to certain services and will appear on your monthly billing statement. Additional surcharges, fees, promotions or discounts may apply.

All products ordered may not appear on this letter. Please refer to your bill for complete details.

You have ordered these services for:
(4b)

Monthly Charges	
High-Speed Internet connection speed up to 1.5Mbps/896Kbps	\$45.99
Discount	\$25.50
Home Phone	\$35.00
Basic Service	
Selective Call Forwarding-Enhanced	
Call Forwarding	
Call Forwarding - Variable	
Caller ID	
Three-Way Calling	
Security Screen®	
No Solicitation Service	
Last Call Return	

(continued on reverse)

Please review the important information enclosed and on the back of this letter about services and terms for use.

Hi (4b)

Thank you for ordering services from CenturyLink. Please take a moment to confirm your order details listed on the left. We appreciate your continued business and promise to do everything we can to make your experience the best it can be.

If you need anything, we're here to help you.

- For questions about your order, services or bill, call Customer Service 1-866-450-6152, weekdays from 8:00 a.m. to 6:00 p.m.
- For technical support or repair, call 1-800-573-1311, 24 hours a day, 7 days a week.

Visit My Account at centurylink.com/myaccount to securely access your account 24/7, go green with paperless billing, find out what's new and more. Your new bill details will be available online after you receive your next bill.

Learn more about your CenturyLink services on the included instruction sheets. You can also find helpful hints online at centurylink.com/welcome.

Please keep this order confirmation for your records.

CenturyLink®

Order Details

(continued)

Call Waiting ID	
Call Rejection - Enhanced	
Anonymous Call Rejection	
Employee Discount Plan	
Access Recovery Charge	\$1.48
Advanced Modem-Lease	\$9.99
(SBH charges may apply)	
Internet Cost Recovery Charge	\$1.99
Federal Access Charge	\$5.85

One-Time Charges	
Home Phone	\$31.00

You have ordered these services for:

(4b)

Monthly Charges	
Basic Service	\$20.00
15 Cent Single Rate Plan	\$2.99
Access Recovery Charge	\$1.48
Federal Access Charge	\$5.85

One-Time Charges	
Basic Service	\$31.00

If you are adding, or changing your individual products to a High-Speed Internet and Home Phone Bundle, you may lose some of the bundle savings you may currently be receiving on your account. These bundle savings may not be available in the future. Also, if applicable, by opting into the Internet and Home Phone Bundle, your previous Price-for-Life promotion on your High-Speed Internet service will no longer apply and is no longer available. This means that the price of your High-Speed Internet service could be subject to future rate increases.

If you ordered Verizon Wireless service, you'll receive a separate order confirmation from Verizon Wireless.

Your CenturyLink® High-Speed Internet Service and related products are offered under the High-Speed Internet Subscriber Agreement terms, which are located at centurylink.com/legal/highspeedinternetsubscriberagreement. Please review the terms, which include late fees, arbitration and limits on CenturyLink liability. If you do not agree, call CenturyLink to cancel your service within 30 days. CenturyLink updates the Subscriber Agreement from time to time and your continued use of the service(s) constitutes your acceptance of any changes. High-Speed Internet Technical Support Representatives available 24 hours a day, 7 days a week at 1-888-777-9569 or online at www.cthelp.com through the Click to Chat icon.

High-Speed Internet: Available only to CenturyLink residential local service customers. Phone line installation and ISP charges are extra. Service may not be available in all areas, requires compatible broadband modem, available from CenturyLink. Modems not supplied by CenturyLink may not be supported. Connection speeds are based on sync rates. Download speeds will be up to 15% lower due to network requirements and may vary for reasons such as customer location, websites accessed, Internet congestion and customer equipment. Other restrictions and fees may apply. Rates subject to change.

It is very important that you set up your Call Following service immediately to prevent others from illegally billing long-distance calls to your account. Please call the Update Center at 1-888-Your Area Code-8052* and set up your personal security code right away. See enclosed product sheet for more details. *Accounts in MN, IA, AZ and OR have special Update Center dialing instructions on the product sheet.

For important information about your rights as a CenturyLink customer in Washington and our responsibilities as your telecommunications provider, see our web site <http://www.centurylink.com/legal/>

Call Trace is available to you on a pay per use basis. Refer to the phone services pages of your local white pages directory for instructions. Your pay per use fee in Washington is \$1.50.

Telephone assistance plans help low-income citizens with the cost of telephone service. Eligibility is dependent upon income guidelines and other criteria. For more information, please call CenturyLink.

We want you to be happy with the optional phone services you ordered. If you have any problems, please give us a call and ask about our service guarantees. Toll plans, maintenance plans and basic service are not covered. Please refer to the owner's manual of any equipment you've purchased for separate warranty information.

Product and service limitations may exist. If a product or service insert or specific instructions to obtain additional information were not provided for your product or service, please contact your CenturyLink Representative or call 1-866-450-6152, referring to your order date and order number, for product or service details, plan and feature restrictions and limitations.

Conditions encountered at installation may require additional labor and equipment charges, which will be listed on your CenturyLink bill.

Your telephone services are billed in advance. Your next bill may include charges for both a full and partial month of service.

Directory Assistance, Operator Services, Speed Calling, and Local Long Distance service provided by CenturyLink Corporation are offered pursuant to Catalog Terms located at <http://centurylink.com/legal/washington/index.html> Ordering and/or using these services means you agree to the Catalog Terms that govern them.



Your Order Confirmation

Please contact CenturyLink Monday - Friday 8 a.m. - 6 p.m.

For TTY (Telecommunications Device for the Deaf) Services call 1-800-223-3131.

For customer inquiries, write to CenturyLink, 930 15th Street, 11th Floor, Denver, CO 80202

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Your Order Confirmation

► Here is a guide to the Long Distance plans you've chosen.

Employee Discount Plan

A special employee long-distance discount

Domestic calling from home

- One great low 2.5¢ per minute rate for direct-dialed state-to-state, in-state and local toll (if selected) calls.
- Monthly Long Distance Line Charge on this plan is 49¢ per account.
- Call any time of the day or any day of the week — no calling time restrictions.
- If you currently have IntraLATA toll concession, you can still benefit from CenturyLink long-distance service. When ordering, select CenturyLink state-to-state long-distance service and keep your current local toll provider. Then you'll be able to enjoy the benefits of both the CenturyLink Employee Discount Plan and your concession too.

International calling from home

- Enjoy low discounted rates to countries you call most often with CenturyLink® Choice® International plan.
- No monthly fee — the standard \$4.00/month CenturyLink Choice® International fee is waived.
- Call any time of the day or any day of the week — no calling time restrictions.
- Rates vary by country. Please visit centurylink.com/welcome or call CenturyLink for the most current rates.
- Other International savings plan options are available at regular pricing.

For more information call 1-866-450-6152.

CenturyLink® 15 Cent Single Rate Plan

One rate, every day, all the time!

Domestic calling from home

- 15¢ per minute for direct-dialed state-to-state, in-state and local toll calls.
- Monthly Long Distance Line Charge on this plan is \$2.99 per account.
- Call any time of the day or any day of the week - no calling time restrictions.
- Simplicity of one monthly bill and one customer service number for all your local and long-distance phone services.

If you have received CenturyLink Long Distance in error, we will gladly switch your long-distance service back to your original provider, or to another provider of your choice. CenturyLink will make the change for free within the first 30 days. Please call 1-866-450-6152 to request a change or for more information. You may also contact your previous carrier or your preferred carrier to switch your service.

CenturyLink® 15 Cent Single Rate Plan: Available only to CenturyLink local service customers for residential use. Rate covers domestic calls at \$0.15 per minute. \$2.99 Long Distance Line Charge, monthly charge, per account also applies. Any PIC Change Charge assessed by your local service provider for changing long-distance carriers is not included. Calls made using calling card service may be billed at a higher rate. Listed rates cover calls only within the US and US Territories and do not include taxes, incremental charges and surcharges. International rates are excluded. Subject to applicable tariffs and regulations. Rates subject to change.

Employee Discount Plan: Available only to current CenturyLink employees and qualified referrals for residential use. Rate for IntraLATA calls is \$0.025 per minute. Billed minutes of use are rounded up to the nearest cent. International rates excluded. \$0.49 Long Distance Line Charge applies per account. Listed rates cover calls only within the US and to US Territories and do not include taxes, incremental charges and surcharges. Subject to applicable tariffs and regulations. Rates subject to change.

CenturyLink®

If an International Plan is not selected, International Base Rates apply and vary depending on time of day and country called.

Remember to dial a "1" when making a long distance call.

Calls that use special facilities, such as satellites (ship to shore, satellite phones) may have special, significantly higher rates, even when they are initiated from your CenturyLink landline. The called number may or may not have unique numbers; if you have any doubt or question, contact CenturyLink for more details. These calls can be very expensive.

For customer inquiries, write to CenturyLink, 100 CenturyLink Drive, Monroe, LA 71203

NOTE: The pricing quoted above reflects our standard monthly rates. Any promotional price reductions due to term agreements or discounts negotiated at the time of sale may not appear in this letter, but will appear in detail on your monthly invoice.

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APPENDIX B



STATE OF WASHINGTON

UTILITIES AND TRANSPORTATION COMMISSION

1300 S. Evergreen Park Dr. S.W., P.O. Box 47250 • Olympia, Washington 98504-7250

(360) 664-1160 • TTY (360) 586-8203

May 5, 2017

Phil Grate
State Regulatory Affairs Director
1600 7th Avenue, Room 1506
Seattle, WA 98191

Dear Mr. Grate:

This letter provides my response to your request for an escalation regarding the requirements of Washington Administrative Code (WAC) 480-120-071(3) and 480-120-071(4) as they apply to extension of service.

On April 14, 2017, commission staff recorded a violation of WAC 480-120-071(3) and a violation of WAC 480-120-071(4) in consumer complaint CAS-20417-Y7K6M8 based on the following: A CenturyLink retiree moved into a housing development and requested new telephone service. No phone line currently exists at the home; therefore, the customer was told by a CenturyLink representative that he would need to secure services from Comcast. Staff was also informed by the CenturyLink representative that their regulatory counsel stated the line extension rule (WAC 480-120-017) does not apply to developments.

This complaint was escalated to me for review, and you and I met on April 19, 2017, to discuss the issue. You followed up with a letter on April 21 outlining CenturyLink's position and concerns. I appreciate the information you provided, and for taking the time to meet with me. I committed to thoroughly research the issue, which I have done. My research included discussions with subject matter experts and legal counsel.

In the line extension rule, WAC 480-120-071, "development" is defined as "**land** which is divided. . .for the purpose of disposition into four or more lots, parcels, or units" (emphasis added). Per the plain language of the rule, a development is land, which, arguably, is not the same as an occupied home. Because the customer is asking for service to his home and not to a "development," the line extension rule requires CenturyLink to extend service.

Phil Grate
May 5, 2017
Page 2

The violations recorded for WAC 480-120-071(3) and WAC 480-120-071(4) stand. Please be aware that future violations of these WACs may be subject to enforcement action, including financial penalties.

You may request a review of this investigation by Pat Hazzard, Safety and Consumer Protection Director. To contact Pat directly, email phazzard@utc.wa.gov or call 360-664-1103.

Sincerely,



Bridgit Feeser
Assistant Director, Consumer Protection

APPENDIX C



STATE OF WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION
1300 S. Evergreen Park Dr. S.W., P.O. Box 47250 • Olympia, Washington 98504-7250
(360) 664-1160 • TTY (360) 586-8203

June 9, 2017

Phil Grate
State Regulatory Affairs Director
1600 7th Avenue, Room 1506
Seattle, WA 98191

Re: Review of CenturyLink consumer complaint CAS-20417-Y7K6M8

Dear Mr. Grate:

This letter provides my response to your request for an escalated review of consumer complaint CAS-20417-Y7K6M8. You and I met on May 22, 2017, to discuss this issue and I appreciate you taking the time to explain CenturyLink's position regarding the requirements of Washington Administrative Code (WAC) 480-120-071(3) and 480-120-071(4) as they apply to extension of service.

My review of this case finds that on April 14, 2017, commission staff recorded a violation of WAC 480-120-071(3) and a violation of WAC 480-120-071(4) in consumer complaint CAS-20417-Y7K6M8. In this complaint, a CenturyLink retiree moved into a housing development and requested telephone service from your company. No phone line currently exists at the home; therefore, the customer was told by a CenturyLink representative that he would need to secure services from Comcast. Staff was also informed by the CenturyLink representative that their regulatory counsel stated the line extension rule (WAC 480-120-017) does not apply to developments.

The case was escalated to Bridgit Feeser, Consumer Protection Assistant Director, on April 14. Bridgit responded to you via letter on May 5 and stated that since the customer is asking for service to his home and not to a "development," the line extension rule requires CenturyLink to extend service to the customer. She further stated that the violations recorded for WAC 480-120-071(3) and WAC 480-120-071(4) stand.

In your letter to me dated May 22, 2017, and in our meeting on the same day, you explained that CenturyLink believes a better interpretation of WAC 480-120-071(3) and WAC 480-120-071(4) is that they do not apply to a lot in a development where the Incumbent Local Exchange Carrier (ILEC) has no facilities because the developer of the development declined to enter into a

Respect, Professionalism, Integrity, Accountability

Provisioning Agreement for Housing Development with the ILEC and where there is another provider offering wireline voice service.

The commission's adoption order in its 2008 line extension rulemaking,¹ clearly addresses both the one thousand foot line extension allowance and a proposal to add a new subsection to WAC 480-120-071(3) to address general waivers under WAC 480-120-015. The commission found that "the one thousand foot allowance strikes a reasonable balance between the costs that should be borne by the company and those that should be borne by the customer." In addition, the commission rejected a proposed new subsection including language about requesting waivers, stating "The rule as drafted achieves a bright line standard for companies concerning the obligation to construct a line extension."

Your May 22, 2017, letter also explained that "ongoing access line and revenue loss is why it is important to shield CenturyLink from unnecessary line extension costs to lots in developments where other providers stand ready and willing to provide wireline service." Nowhere in the rule is there an exemption of your company's responsibility to provide service based on a development or the actions of a developer. Further, your assertions regarding revenue loss have no bearing on whether rule violations were appropriately recorded for failing to provide the customer an application for extension of service within seven days (WAC 480-120-071(3)) and for failing to allow an extension of service up to 1000 feet at no charge to the customer (WAC 480-120-071(4)).

To the extent that your May 22 letter seeks to persuade staff that market changes affecting CenturyLink render WAC 480-120-071 no longer reasonable, the proper forum for such a discussion is a petition for rule exemption filed under WAC 480-120-015. Absent that, if you seek to deny service to customers you are violating state law every time you do so.

Given my additional analysis, with Ms. Feeser's previous analysis, I find that staff have interpreted WAC 480-120-071(3) and WAC 480-120-071(4) as they were intended, and the violations in consumer complaint CAS-20417-Y7K6M8 stand.

Thank you again for bringing your concerns forward. Please be aware that future violations of these WACs may be subject to enforcement action, including financial penalties.

Sincerely,

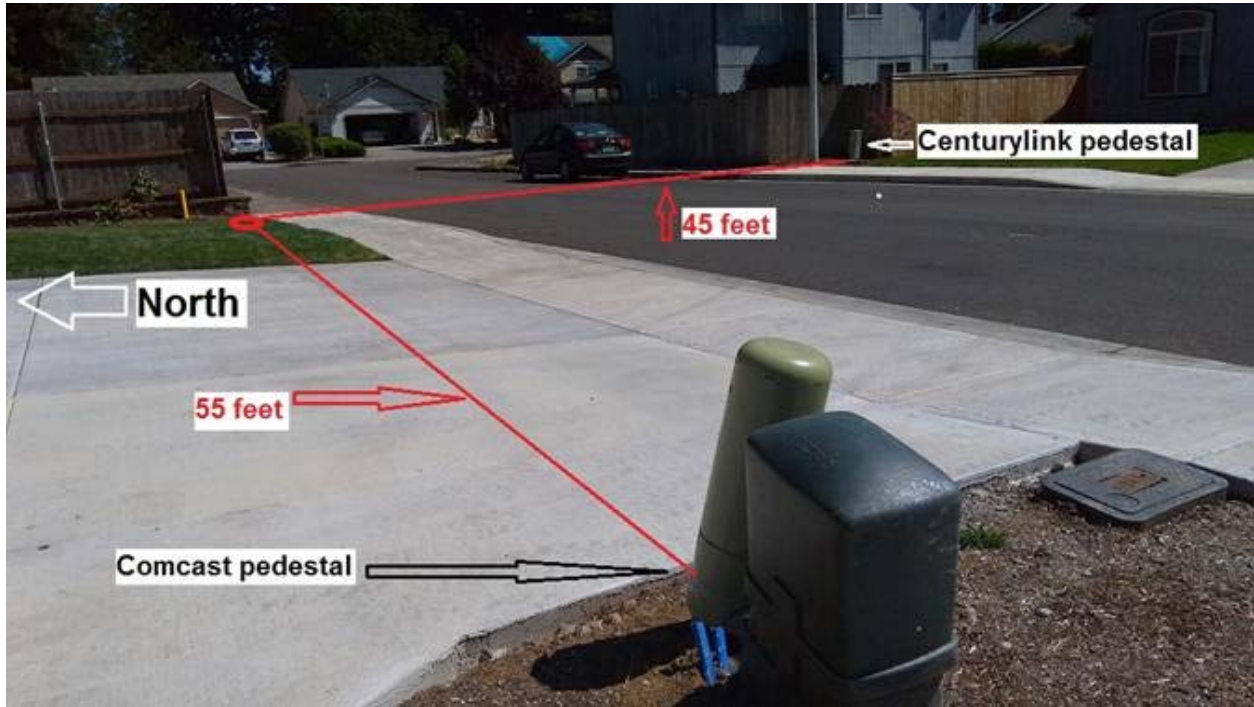


Pat Hazzard
Director, Safety and Consumer Protection

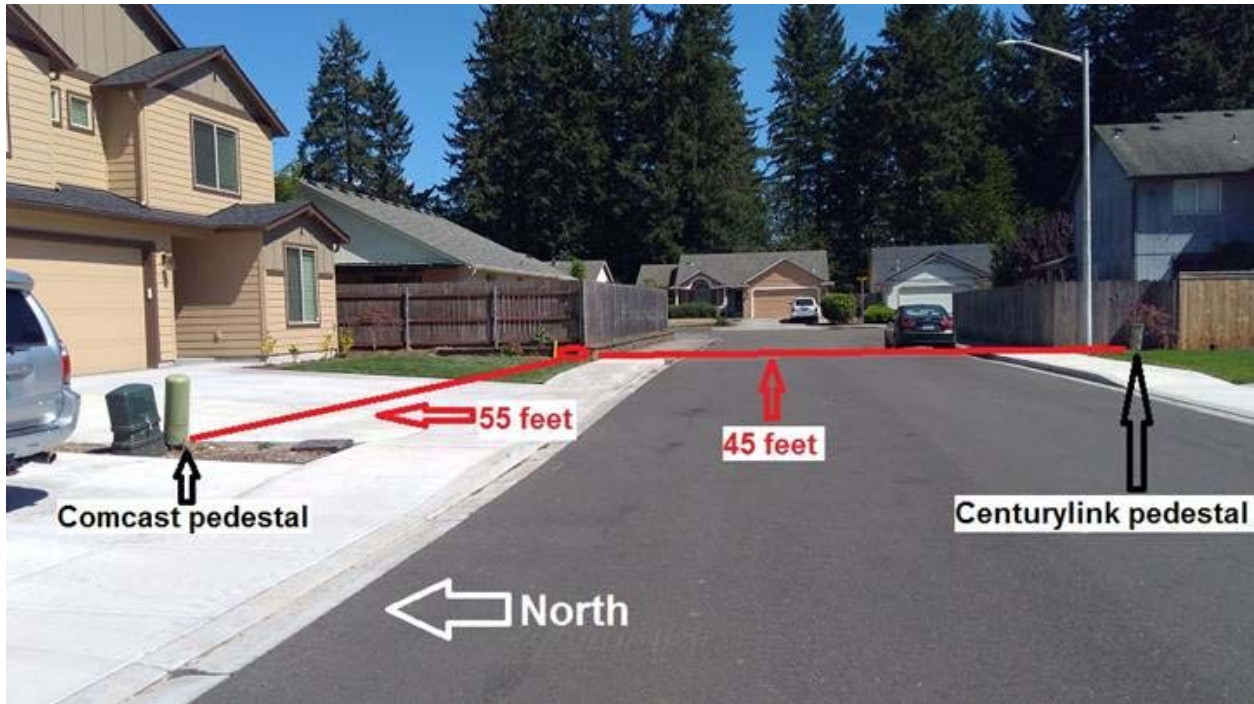
¹ Order R-551, Docket UT-073014

APPENDIX D

Photograph 1 provided by consumer



Photograph 2 provided by consumer



APPENDIX E

Washington State Complaint: CAS-20417-Y7K6M8

Company: CenturyLink Communications LLC

Industry: Telecommunications

Customer: (4b)

Alt Contact:

Account Number:

Service Phone: (4b)

E-mail Address: (4b)

**Service Address: (4b) Vancouver Clark County Washington
98682**

Complaint: CAS-20417-Y7K6M8

Type: Complaint

Serviced By: Alice Fiman

Grouped By: Construction

Opened On: 2/3/2017, 8:00:00 AM

Closed On: 5/8/2017, 10:25:10 AM

Disposition: Consumer upheld

Violations Total: 2

TA Total: 0

Amount Customer Saved:

Description:

The customer requested new phone service from CenturyLink and the service installation was scheduled for 1/5/2017. The technician came to install phone service but said there was no facilities within subdivision. It is a new subdivision, called Anna Marie with approximately 12 homes. The customer stated there is a pedestal across the street from their property. The customer contacted the CenturyLink engineer three times, and engineer said that the customer was responsible to provide a way for the company to run line to their house. 2/10/2017 2:55 p.m. Passed complaint to CenturyLink via email. Response due by 2/14/2017 by 5 p.m.

Result:

As a local exchange company receiving federal high cost universal service support, the rules require the company to extend service to applicants. The company was in violation of WAC 480-120-071(3) for failing to provide the customer an application for extension of service within 7 days and WAC 480-120-071(4) for failing to allow an extension of service up to 1,000 feet at no charge to the customer.

Violations

WAC or RCW: 480-120-071(3)

Count: 1

TA:

Description: The company failed to provide the customer an application for extension of service within 7 days. The company did not provide the customer an application for extension of service. The company was notified of the violation.

WAC or RCW: 480-120-071(4)

Count: 1

TA:

Description: The company failed to allow an extension of service up to 1,000 feet at no charge to the customer and denied the customer service. The company was notified of the violation.

Activities

Activity Type: Email

Activity Date: 2/3/2017, 4:53:35 PM

To: [REDACTED] (4b)

From: sclemen@utc.wa.gov

Subject: WA UTC Complaint CAS-20417-Y7K6M8 for [REDACTED] (4b)
CRM:0043032

Attachments: 0

Body:

Washington UTC Complaint CAS-20417-Y7K6M8

Company: CenturyLink

Customer: [REDACTED] (4b)

Account #:

Contact:

Service Address:

[REDACTED] (4b)

Vancouver Washington 98682

Primary Phone: [REDACTED] (4b)

Secondary Phone:

Email Address: [REDACTED] (4b)

Complaint Information:

Complaint ID: CAS-20417-Y7K6M8

Serviced By: Susan Clemen

Opened On: 2/3/2017 4:24 PM

Grouped By: Construction

Description:

The customer requested new phone service from CenturyLink and the service installation was scheduled for 1/5/2017. The technician came to install phone service but said there was no facilities within subdivision. It is a new subdivision, called Anna Marie with approximately 12 homes. The customer stated there is a pedestal across the street from their property. The customer contacted the CenturyLink engineer three times, and engineer said that the customer was responsible to provide a way for the company to run line to their house.

2/3/2017 4:48 p.m. Passed complaint to CenturyLink via email. Response due by 2/7/2017 by 5

p.m.

Activity Type: Email

Activity Date: 2/10/2017, 10:39:22 AM

To: sclemen@utc.wa.gov;sclemen@utc.wa.gov;

From: (4b)

**Subject: RE: WA UTC Complaint CAS-20417-Y7K6M8 for (4b)
CRM:0043032**

Attachments: 0

Body:

Hi Susan,

Just checking in for any developments.

(4b)

Activity Type: Email

Activity Date: 2/14/2017, 8:21:45 AM

To: sclemen@utc.wa.gov;sclemen@utc.wa.gov;

From: Jerolyn.Ochs@CenturyLink.com

**Subject: WA UTC Complaint CAS-20417-Y7K6M8 for (4b)
CRM:0043044**

Attachments: 1

Body:

Susan-

Enclosed please find my response to the issues presented concerning Mr. (4b)

This customer is a CenturyLink Retiree. He moved into what we call a no serve housing development. The developer did not wire for phone service for these residents. Our engineer Mark Guz has had extensive conversations with the customer and the developer. The developer was going to run a conduit to an existing pedestal under the street and place a conduit to Mr. (4b) home. The developer was going to contact us, at that point, so we could place a buried service wire to bring service to the customer. That is the last communication that we received and have had no contact beyond this point. Once this work is performed, we would be happy to provide the service. As outlined in the enclosed.

Thanks.

Jerolyn Ochs

Regulatory Analyst
Customer Advocacy
930 15th Street
Denver, CO 80202
Office: (844) 840-3536

This communication is the property of CenturyLink and may contain confidential or privileged information. Unauthorized use of this communication is strictly prohibited and may be unlawful. If you have received this communication in error, please immediately notify the sender by reply e-mail and destroy all copies of the communication and any attachments.

Activity Type: Email

Activity Date: 2/14/2017, 1:58:47 PM

To: Jerolyn.Ochs@CenturyLink.com;

From: sclemen@utc.wa.gov

Subject: RE: WA UTC Complaint CAS-20417-Y7K6M8 for (4b)
CRM:0043044

Attachments: 0

Body:

Hello Jerolyn,
Please confirm if there is supposed to be an attachment. You stated "as outlined in the enclosed" at the end of your response.

Thank you,
Susan

Activity Type: Email

Activity Date: 2/15/2017, 6:46:44 AM

To: sclemen@utc.wa.gov;sclemen@utc.wa.gov;

From: Jerolyn.Ochs@CenturyLink.com

Subject: RE: WA UTC Complaint CAS-20417-Y7K6M8 for (4b)
CRM:0043044

Attachments: 0

Body:

Sorry Susan-

I was not referring to an attachment I was referring to the response that I sent you.

Please advise if questions.

Activity Type: Email

Activity Date: 2/15/2017, 3:55:15 PM

To: sclemen@utc.wa.gov;sclemen@utc.wa.gov;

From: (4b)

Subject: RE: WA UTC Complaint CAS-20417-Y7K6M8 for [REDACTED] (4b)
CRM:0043032

Attachments: 0

Body:

Hi Susan,

Just wondering if there has been any response yet.

Thank you,
[REDACTED] (4b)

Activity Type: Email

Activity Date: 2/16/2017, 1:06:12 PM

To: Jerolyn.Ochs@CenturyLink.com;

From: sclemen@utc.wa.gov

Subject: RE: WA UTC Complaint CAS-20417-Y7K6M8 for [REDACTED] (4b)
CRM:0043044

Attachments: 0

Body:

Thanks for the clarification regarding the attachment.

If the developer does not move forward and install conduit, what would the customer have to do in order to obtain a landline?

2/16/2017 1:05 p.m. Passed complaint to CenturyLink via email. Response due by 2/22/2017 by 5 p.m. NOTE: I will be on leave February 22 through March 3.

Activity Type: Phone Call

Activity Date: 2/16/2017, 4:30:00 PM

Direction: Outgoing

Customer: [REDACTED] (4b)

UTC POC: Alice Fiman

Subject: Phone call to customer

Description:

I called the customer and let him know that my investigation is still on going and as soon as it is complete, I would contact him. He thanked me and said he'll wait to hear back from me.

Activity Type: Email

Activity Date: 2/22/2017, 12:31:36 PM

To: sclemen@utc.wa.gov;sclemen@utc.wa.gov;

From: Jerolyn.Ochs@CenturyLink.com

Subject: RE: WA UTC Complaint CAS-20417-Y7K6M8 for [REDACTED] (4b)
CRM:0043044

Attachments: 1

Body:

Susan-

The developer did not choose CenturyLink to serve this development. This customer has the option to secure his services from Comcast but CenturyLink does not provide the service.

Please let me know if you need anything else.

Activity Type: Email

Activity Date: 2/22/2017, 4:40:05 PM

To: Jerolyn.Ochs@CenturyLink.com;

From: sclemen@utc.wa.gov

Subject: RE: WA UTC Complaint CAS-20417-Y7K6M8 for [REDACTED] (4b)
CRM:0043044

Attachments: 0

Body:

Please provide an explanation as to why CenturyLink believes it is not obligated to provide dial-tone service to the customer as required by WAC 480-120-071.

Your response is due 2/27/2017 by 5 p.m. NOTE: I will be on leave February 23 through March 3.

Activity Type: Email

Activity Date: 2/23/2017, 7:44:23 AM

To: sclemen@utc.wa.gov;sclemen@utc.wa.gov;

From: Jerolyn.Ochs@CenturyLink.com

Subject: RE: WA UTC Complaint CAS-20417-Y7K6M8 for [REDACTED] (4b)
CRM:0043044

Attachments: 0

Body:

Susan,

We actually reviewed the WA 480-120-071 rule in the process of handling this complaint. The line extension rule does not apply to developments according to our regulatory counsel.

Please advise if anything further.

Activity Type: Email

Activity Date: 2/23/2017, 12:11:21 PM

To: Jerolyn.Ochs@CenturyLink.com;

From: afiman@utc.wa.gov

**Subject: RE: WA UTC Complaint CAS-20417-Y7K6M8 for (4b)
CRM:0043044**

Attachments: 0

Body:

Good afternoon,
With Susan out of the office, I am overseeing her complaints.

There may be some confusion at this point. This complaint is from a private homeowner requesting service to his home.

There is no exclusion in the rule that I can find for denying service due to the homeowner's location. If there is documentation showing the company can deny service due to a customer's location, please provide it.

If not, please move forward on providing the customer the service he has requested, including what the customer would have to do to obtain a landline from CenturyLink.

Thank you,

Alice

Response due 2/28/17 by 5 p.m.

Activity Type: Email

Activity Date: 2/24/2017, 9:00:15 AM

To: sclemen@utc.wa.gov;sclemen@utc.wa.gov;

From: (4b)

**Subject: RE: WA UTC Complaint CAS-20417-Y7K6M8 for (4b)
CRM:0043032**

Attachments: 0

Body:

Good morning Susan,

Just wanting to know if there is any activity on my complaint.

Sincerely,
(4b)

Activity Type: Email

Activity Date: 2/24/2017, 12:52:32 PM

To: sclemen@utc.wa.gov;sclemen@utc.wa.gov;

From: (4b)

Subject: RE: Automatic reply: WA UTC Complaint CAS-20417-Y7K6M8 for (4b) CRM:0043032

Attachments: 0

Body:

December of what year, Susan ??

From: Clemen, Susan (UTC) [mailto:sclemen@utc.wa.gov]

Sent: Friday, February 24, 2017 9:00 AM

To: (4b)

Subject: Automatic reply: WA UTC Complaint CAS-20417-Y7K6M8 for (4b) CRM:0043032

I am out of the office today. I will respond when I return on Friday, December 30th. Thanks!

Activity Type: Email

Activity Date: 2/27/2017, 4:00:02 PM

To: sclemen@utc.wa.gov;sclemen@utc.wa.gov;

From: (4b)

Subject: RE: Automatic reply: WA UTC Complaint CAS-20417-Y7K6M8 for (4b) CRM:0043032

Attachments: 0

Body:

Hi Susan,

It is well after December 30th by now. Have you heard any activity on my complaint?

Hope you had a great weekend,

(4b)

Activity Type: Email

Activity Date: 2/28/2017, 2:56:13 PM

To: afiman@utc.wa.gov;

From: Jerolyn.Ochs@CenturyLink.com

Subject: WA UTC Complaint CAS-20417-Y7K6M8 for (4b) CRM:0043044

Attachments: 1

Body:

Ms, Finman-

Here is the analysis of the line extention rule and its application in this situation. Please see below.

From: Fiman, Alice (UTC) [<mailto:Afiman@utc.wa.gov>]

Sent: Thursday, February 23, 2017 1:11 PM

To: Ochs, Jerolyn

Subject: RE: WA UTC Complaint CAS-20417-Y7K6M8 for (4b) CRM:0043044
Importance: High

Good afternoon,
With Susan out of the office, I am overseeing her complaints.

There may be some confusion at this point. This complaint is from a private homeowner requesting service to his home.

There is no exclusion in the rule that I can find for denying service due to the homeowner's location. If there is documentation showing the company can deny service due to a customer's location, please provide it.

If not, please move forward on providing the customer the service he has requested, including what the customer would have to do to obtain a landline from CenturyLink.

Thank you,

Alice

The line extension rule, in subsection (2) under definitions, states that "Extension of service" means an extension of company distribution plant for new residential basic local exchange service to a location where no distribution plant of the extending company exists at the time an extension of service is requested. An extension is constructed at the request of one or more applicants for service. Extensions of service do not include trenches, conduits, or other support structure for placement of company-provided facilities from the applicant's property line to the premises to be served. *Extension of service, as defined in this rule, does not apply to extensions of service to developments or to extensions of service for temporary occupancy or temporary service.*" (emphasis added)

This request for an extension of service is to a development. Developers obtain service to their developments by entering into a housing development agreement (PAHD) with CenturyLink, which includes certain requirements on the developer to ensure that we have sufficient infrastructure in place and that CenturyLink has a path to run the facilities to serve the development. This timing also gives the company the opportunity to place facilities in a least cost manner, without the more expensive option of cutting pavement or boring underneath roads in finished subdivisions. When a developer has had the opportunity to allow us to serve in the development, and has placed the necessary conduits, poles, etc., that is how a development gets service. If the developer refuses, as was the case here, then the line extension rule does not allow the individual customers to avoid that requirement, as CenturyLink at this time has not placed facilities or ensured capacity to serve the customer or others in the development. Otherwise the exception in the line extension rule that excludes developments would be meaningless

Qwest's catalog, which contains the terms and conditions for the PAHD, states that the company has the *option* to serve in a development if the developer chooses not to enter into a PAHD, but is not required to do so. See, Qwest Exchange and Network Services Catalog No. 2, Section 4.4. C.

Developer Non-Participation. If a Developer/Builder does not enter into a PAHD, the Company, *at its option*, may accept requests for service from individual customers in the subdivision/development area as provided for **in Section 4.2.2** (emphasis added).

This has been CenturyLink's policy and approach for many years (this PAHD provision has been in place since 2008), and CenturyLink does not serve in developments where the developer has not signed a PAHD for the provision of service to the housing development. CenturyLink had further reviewed this approach with telecom Staff, and they were in concurrence with this approach, especially when the customers had alternative service providers available.

At this time, if the homeowner will provide a conduit under the street between the pedestal and his home, CenturyLink can provide service. Because the line extension rule does not apply, there is no allowance for the extension and the homeowner is responsible to provide the path. Otherwise, there is an alternative service provider in the development for landline service. Similarly, other homeowners in this development would be required to provide a path to their homes if they wanted service from CenturyLink.

Jerolyn Ochs

Regulatory Analyst
Customer Advocacy
930 15th Street
Denver, CO 80202
Office: (844) 840-3536

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Activity Type: Email

Activity Date: 2/28/2017, 2:56:47 PM

To: afiman@utc.wa.gov;Jerolyn.Ochs@CenturyLink.com;Jerolyn.Ochs@CenturyLink.com;

From: Jerolyn.Ochs@CenturyLink.com

Subject: RE: WA UTC Complaint CAS-20417-Y7K6M8 for (4b)
CRM:0043044

Attachments: 1

Body:

Forgive me for the misspelling of your name...

Activity Type: Email

Activity Date: 3/6/2017, 11:16:38 AM

To: (4b) sclemen@utc.wa.gov;sclemen@utc.wa.gov;

From: sclemen@utc.wa.gov

Subject: RE: Automatic reply: WA UTC Complaint CAS-20417-Y7K6M8 for (4b) CRM:0043032

Attachments: 0

Body:

Hello Mr. (4b)

My apologies regarding my out of office email automatic reply; it should have read that I was returning to the office on Monday, March 6th.

The investigation regarding extending new CenturyLink service to your residence is still ongoing. Please be aware that investigations generally take between four and six weeks to complete, sometimes longer. I hope to have a response to you soon.

Sincerely,
Susan Clemen

----- Original Message -----

From: (4b)

Received: 2/24/2017 12:52 PM

To: sclemen@utc.wa.gov; Susan Clemen

Subject: Automatic reply: WA UTC Complaint CAS-20417-Y7K6M8 for (4b) CRM:0043032

December of what year, Susan ??

From: Clemen, Susan (UTC) [mailto:sclemen@utc.wa.gov]

Sent: Friday, February 24, 2017 9:00 AM

To: [REDACTED] (4b)

Subject: Automatic reply: WA UTC Complaint CAS-20417-Y7K6M8 for [REDACTED] (4b)
CRM:0043032

I am out of the office today. I will respond when I return on Friday, December 30th. Thanks!

Activity Type: Phone Call

Activity Date: 3/6/2017, 1:30:00 PM

Direction: Incoming

Customer: [REDACTED] (4b)

UTC POC: Alice Fiman

Subject: Phone call from customer

Description:

The customer called to inquire about his complaint. I explained that I sent him an email this morning stating that his investigation is still ongoing and once I have information I will contact him. He replied he had not checked his email yet today and said he looked forward to hearing back from me.

Activity Type: Email

Activity Date: 3/28/2017, 12:18:41 PM

To: afiman@utc.wa.gov;

From: Jerolyn.Ochs@CenturyLink.com

Subject: FW: WA UTC Complaint CAS-20417-Y7K6M8 for [REDACTED] (4b)
CRM:0043044

Attachments: 0

Body:

Good afternoon-

We are not obligated to provide service in a development where the developer has refused to sign a PAHD. The line extension rule does not apply inside a development. That is specified within the rule itself. "*Extension of service, as defined in this rule, does not apply to extensions of service to developments or to extensions of service for temporary occupancy or temporary service.*"

At this time, if the homeowner will provide a conduit under the street between the pedestal and his home, CenturyLink can provide service. Because the line extension rule does not apply, there is no allowance for the extension and the homeowner is responsible to provide the path. Otherwise, there is an alternative service provider in the development for landline service. Similarly, other homeowners in this development would be required to provide a path to their homes if they wanted service from CenturyLink.

Thank you.

Activity Type: Email

Activity Date: 3/28/2017, 3:03:38 PM

To: Jerolyn.Ochs@CenturyLink.com;

From: afiman@utc.wa.gov

Subject: RE: FW: WA UTC Complaint CAS-20417-Y7K6M8 for (4b)
CRM:0043044

Attachments: 0

Body:

Thank you for the quick reply.

In the definitions, it defines a development as land which is divided or proposed to be divided. Mr. (4b) (the applicant) does not live on land that is divided or proposed to be divided.

Thank you,

Alice

Activity Type: Email

Activity Date: 3/29/2017, 8:25:12 AM

To: afiman@utc.wa.gov;

From: Jerolyn.Ochs@CenturyLink.com

Subject: RE: FW: WA UTC Complaint CAS-20417-Y7K6M8 for [REDACTED] (4b)
[REDACTED] CRM:0043044

Attachments: 0

Body:

Alice-

Our terms and conditions state that if someone lives in a development and, the developer was offered and refused PAHD, we do not have to serve. In this case the *Developer* was offered a PAHD and refused. In these cases, it is our discretion/option to serve or not and, in this case, we choose not to serve unless the customer provides that path to his residence.

Please advise how the customer wishes to proceed.

Thank you.

Activity Type: Email

Activity Date: 3/29/2017, 10:53:51 AM

To: Jerolyn.Ochs@CenturyLink.com;

From: afiman@utc.wa.gov

Subject: RE: FW: WA UTC Complaint CAS-20417-Y7K6M8 for [REDACTED] (4b)
[REDACTED] CRM:0043044

Attachments: 0

Body:

Thank you,
These terms and conditions are in violation of WAC 480-120-071(4)(a), which states:

A company must allow for an extension of service within its service territory up to one thousand feet at no charge to the applicant. The company may allow for an extension of service for distances over the allowance.

Please provide information on how the company will comply with this WAC for the customer.

Thank you,

Alice

Response due 4/3/17 by 5 p.m.

Activity Type: Phone Call

Activity Date: 3/30/2017, 4:45:00 PM

Direction: Outgoing

Customer: [REDACTED] (4b)

UTC POC: Alice Fiman

Subject: Phone call to customer

Description:

I called and spoke to the customer and provided a status update on his complaint. I explained that his complaint has been escalated within the UTC because the Consumer Protection Section does not agree with CenturyLink's determination of not providing service to him. I told him the commission would contact him again as soon as we have additional information. He thanked me for calling and providing him an update.

Activity Type: Email

Activity Date: 4/3/2017, 1:09:44 PM

To: afiman@utc.wa.gov;

From: Jerolyn.Ochs@CenturyLink.com

Subject: RE: FW: WA UTC Complaint CAS-20417-Y7K6M8 for (4b)
CRM:0043044

Attachments: 1

Body:

Good afternoon-

We don't believe that the line extension rule applies to this customer. At this juncture, we will take the violation and then appeal.

Thank you in advance for your time.

Activity Type: Email

Activity Date: 4/6/2017, 4:27:00 PM

To: afiman@utc.wa.gov;

From: CRMAdmSvc@utc.wa.gov

Subject: CAS-20417-Y7K6M8 has been Assigned to You CRM:0042065

Attachments: 0

Body:

CAS-20417-Y7K6M8

Activity Type: Email

Activity Date: 4/6/2017, 4:27:30 PM

To: afiman@utc.wa.gov;

From: CRMAdmSvc@utc.wa.gov

Subject: CAS-20417-Y7K6M8 has been Assigned to You CRM:0042065

Attachments: 0

Body:

CAS-20417-Y7K6M8

Activity Type: Email

Activity Date: 4/6/2017, 4:29:08 PM

To: Jerolyn.Ochs@CenturyLink.com;

From: afiman@utc.wa.gov

Subject: RE: FW: WA UTC Complaint CAS-20417-Y7K6M8 for [REDACTED] (4b)
[REDACTED] CRM:0043044

Attachments: 0

Body:

Thank you,
As I was putting together the case information for my supervisor to review per the escalation policy, I was unable to find information regarding if CenturyLink provided the applicant with a cost estimate when the applicant requested an extension of service.

Did CenturyLink provide the cost estimate? And if so, what is the estimate?

Response due 4/11/2017 by 5 p.m.

Thank you,

Alice

Activity Type: Email

Activity Date: 4/11/2017, 10:04:14 AM

To: afiman@utc.wa.gov;

From: Jerolyn.Ochs@CenturyLink.com

Subject: RE: FW: WA UTC Complaint CAS-20417-Y7K6M8 for [REDACTED] (4b)
[REDACTED] CRM:0043044

Attachments: 1

Body:

Good morning-

The cost estimate is a range. The reason is because there is an opportunity, based on other jobs in the area that, we would need to bore through some cobble which would increase the cost. The projected/perspective costs do not include installation or permit. The permit cost would be approximately \$125.00. Installation would vary based on what is needed at the time of installation.

Job cost: \$1670.00 if no cobble to \$3000.00 should boring through cobble be necessary.

Please advise if anything further.

Thanks.

Activity Type: Email

Activity Date: 4/14/2017, 11:41:54 AM

To: Jerolyn.Ochs@CenturyLink.com;

From: afiman@utc.wa.gov

Subject: RE: FW: WA UTC Complaint CAS-20417-Y7K6M8 for [REDACTED] (4b)
[REDACTED] CRM:0043044

Attachments: 0

Body:

Good morning,

I have recorded the following violations:

One violation of WAC 480-120-071(3) for failing to provide the customer an application for extension of service within 7 days

and

One violation of WAC 480-120-071(4) for failing to allow an extension of service up to 1,000 feet at no charge to the customer.

As a local exchange company receiving federal high cost universal service support, the rules require the company to extend service to applicants. If the company chooses to continue to deny service to this applicant, they will continue to be in violation of WAC 480-120-071.

The complaint is now closed. The disposition is consumer upheld and the company should move forward with providing service to this customer under WAC 480-120-071.

You have requested an escalation to Bridgit Feeser, Assistant Director for consumer protection. She will contact you with her findings.

Thank you,

Alice Fiman, UTC

Activity Type: Email

Activity Date: 4/14/2017, 11:42:24 AM

To: bfeeser@utc.wa.gov;

From: CRMAdmSvc@utc.wa.gov

Subject: CAS-20417-Y7K6M8 has been Assigned to You CRM:0042086

Attachments: 0

Body:

CAS-20417-Y7K6M8

Activity Type: Email

Activity Date: 4/14/2017, 11:42:27 AM

To: bfeeser@utc.wa.gov;

From: CRMAdmSvc@utc.wa.gov

Subject: CAS-20417-Y7K6M8 has been Assigned to You CRM:0042086

Attachments: 0

Body:

CAS-20417-Y7K6M8

Activity Type: Email

Activity Date: 4/17/2017, 12:35:52 PM

To: bfeeser@utc.wa.gov;

From: Phil.Grate@CenturyLink.com

Subject: FW: FW: WA UTC Complaint CAS-20417-Y7K6M8 for [REDACTED] (4b)
[REDACTED] CRM:0043044

Attachments: 0

Body:

Bridget,

Would you have some time to discuss this violation with me in person? I'd like an opportunity to offer CenturyLink's perspective.

Thanks,

Phil

Activity Type: Email

Activity Date: 4/17/2017, 1:56:28 PM

To: bfeeser@utc.wa.gov;

From: Phil.Grate@CenturyLink.com

Subject: RE: FW: WA UTC Complaint CAS-20417-Y7K6M8 for [REDACTED] (4b)
[REDACTED] CRM:0043044

Attachments: 1

Body:

Hi, Bridgit

I've got Wednesday early afternoon free. How does 1:00 look for you?

From: Feeser, Bridgit (UTC) [mailto:bfeeser@utc.wa.gov]

Sent: Monday, April 17, 2017 1:49 PM

To: Grate, Phil

Subject: RE: FW: WA UTC Complaint CAS-20417-Y7K6M8 for [REDACTED] (4b) CRM:0043044

Hi Phil,

I have a meeting from 2:30-3:30 today, but have no other meetings this afternoon. Most of tomorrow and Wednesday looks good as well. Are you free during any of these times?

Thanks,
Bridgit

Activity Type: Email

Activity Date: 4/17/2017, 2:07:14 PM

To: bfeeser@utc.wa.gov;

From: Phil.Grate@CenturyLink.com

Subject: RE: FW: WA UTC Complaint CAS-20417-Y7K6M8 for [REDACTED] (4b) [REDACTED] CRM:0043044

Attachments: 1

Body:

Thanks, Bridgit

I was thinking I would come to the UTC for an in person discussion if that works for you.

From: Feeser, Bridgit (UTC) [mailto:bfeeser@utc.wa.gov]

Sent: Monday, April 17, 2017 2:06 PM

To: Grate, Phil

Subject: RE: FW: WA UTC Complaint CAS-20417-Y7K6M8 for [REDACTED] (4b) CRM:0043044

Hi Phil,

Wednesday at 1:00 works for me and I have held that time on my calendar. Do you want to give me a call or should I call you?

Thanks,

Bridgit Feeser

Consumer Protection Assistant Director
(360) 664-1111 Office
bfeeser@utc.wa.gov

Utilities and Transportation Commission

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Activity Type: Email

Activity Date: 4/17/2017, 3:48:23 PM

To: bfeeser@utc.wa.gov;

From: Phil.Grate@CenturyLink.com

Subject: RE: FW: WA UTC Complaint CAS-20417-Y7K6M8 for [REDACTED] (4b)
[REDACTED] CRM:0043044

Attachments: 1

Body:

Hi, Bridgit. I'd like a chance to explain why we think the violation should be reversed and to hear your thoughts on it.

From: Feeser, Bridgit (UTC) [mailto:bfeeser@utc.wa.gov]

Sent: Monday, April 17, 2017 2:21 PM

To: Grate, Phil

Subject: RE: FW: WA UTC Complaint CAS-20417-Y7K6M8 for [REDACTED] (4b) CRM:0043044

Hi Phil,

I'm not opposed to discussing this in person, but I would like to know what you expect from the meeting so that I can be prepared.

Thanks,
Bridgit

Activity Type: Email

Activity Date: 4/19/2017, 10:13:25 AM

To: bfeeser@utc.wa.gov;

From: Phil.Grate@CenturyLink.com

**Subject: RE: FW: WA UTC Complaint CAS-20417-Y7K6M8 for [REDACTED] (4b)
[REDACTED] CRM:0043044**

Attachments: 1

Body:

Thanks, Bridgit

I'll be in the lobby at 1:00.

From: Feeser, Bridgit (UTC) [mailto:bfeeser@utc.wa.gov]

Sent: Monday, April 17, 2017 5:16 PM

To: Grate, Phil

Subject: RE: FW: WA UTC Complaint CAS-20417-Y7K6M8 for [REDACTED] (4b) CRM:0043044

Thanks Phil. I'm happy to hear your explanation of why you think the violation should be reversed. While I have been briefed on the commission's position on the rule in question, I will more than likely need to come back and do further research after our meeting.

I will secure a conference room and if there isn't one available, we can meet in my office.

See you on Wednesday.

Activity Type: Activity

Activity Date: 4/19/2017, 1:00:00 PM

Contact: Bridgit Feeser

Subject: Meeting

Attachments: 0

Description:

Met with Phil Grate to discuss company's point of view as to why violations were not warranted. He stated that the company needs to be able to sustain negotiation with developers or the developers will not add facilities if they know they don't have to. It undermines the company's ability to work with developers. CenturyLink is no longer a monopoly and have to save every dime. Where does the commission want them to be spending their money? If they have to add facilities in onesy's or twosy's, it's money down the drain. At the very least, they should not have to provide service to those that have alternative services they can choose from, and it should be limited to those where this service is the last resort.

Activity Type: Activity

Activity Date: 4/21/2017, 2:17:00 PM

Contact: Bridgit Feeser

Subject: received email from company

Attachments: 1

Description:

From: Grate, Phil [mailto:Phil.Grate@CenturyLink.com] Sent: Friday, April 21, 2017 2:17 PM To: Feeser, Bridgit (UTC) Cc: Anderl, Lisa ; Reynolds, Mark Subject: Follow up letter to Wednesday's meeting Bridgit, Thanks again for taking the time to meet with me Wednesday. I mentioned then that I had prepared some charts I proceeded to forget and leave on my desk. So I dropped them into a follow up letter, attached. It also summarizes the points I attempted to make on Wednesday. Please let me know if you have any follow up questions. Kindest regards, Phil Grate Director, Regulatory Affairs 1600 7th Avenue, Seattle, WA 98191 Office 206-345-6224 Wireless 425-301-8411 This communication is the property of CenturyLink and may contain confidential or privileged information. Unauthorized use of this communication is strictly prohibited and may be unlawful. If you have received this communication in error, please immediately notify the sender by reply e-mail and destroy all copies of the communication and any attachments.

Activity Type: Activity

Activity Date: 5/5/2017, 1:01:00 PM

Contact: Bridgit Feeser

Subject: Review results of complaint CAS-20417-Y7K6M8

Attachments: 1

Description:

From: Feeser, Bridgit (UTC) Sent: Friday, May 5, 2017 1:01 PM To: 'Grate, Phil' Cc: Anderl, Lisa ; Reynolds, Mark Subject: review results of complaint CAS-20417-Y7K6M8 Hi Phil, Attached is my response to CenturyLink's request for a review of complaint CAS-20417-Y7K6M8. Thank you for bringing this matter to my attention. Respectfully, Bridgit Feeser Consumer Protection Assistant Director (360) 664-1111 Office bfeeser@utc.wa.gov Utilities and Transportation Commission Respect. Professionalism. Integrity. Accountability. www.utc.wa.gov From: Grate, Phil [mailto:Phil.Grate@CenturyLink.com] Sent: Friday, April 21, 2017 2:17 PM To: Feeser, Bridgit (UTC) Cc: Anderl, Lisa ; Reynolds, Mark Subject: Follow up letter to Wednesday's meeting Bridgit, Thanks again for taking the time to meet with me Wednesday. I mentioned then that I had prepared some charts I proceeded to forget and leave on my desk. So I dropped them into a follow up letter, attached. It also summarizes the points I attempted to make on Wednesday. Please let me know if you have any follow up questions. Kindest regards, Phil Grate Director, Regulatory Affairs 1600 7th Avenue, Seattle, WA 98191 Office 206-345-6224 Wireless 425-301-8411 This communication is the property of CenturyLink and may contain confidential or privileged information. Unauthorized use of this communication is strictly prohibited and may be unlawful. If you have received this communication in error, please immediately notify the sender by reply e-mail and destroy all copies of the communication and any attachments.

Activity Type: Email

Activity Date: 5/5/2017, 6:33:01 PM

To: sclemen@utc.wa.gov;sclemen@utc.wa.gov;

From: [REDACTED] (4b)

Subject: RE: WA UTC Complaint CAS-20417-Y7K6M8 for [REDACTED] (4b)
CRM:0043032

Attachments: 0

Body:

Hi Susan,

I hope this finds you in good health and enjoying our sun-breaks lately.

Have there been any developments with my complaint after 3 months?

Best regards,

[REDACTED] (4b)

Activity Type: Email

Activity Date: 5/8/2017, 9:55:52 AM

To: afiman@utc.wa.gov;

From: CRMAdmSvc@utc.wa.gov

Subject: CAS-20417-Y7K6M8 has been Assigned to You CRM:0042145

Attachments: 0

Body:

CAS-20417-Y7K6M8

Activity Type: Email

Activity Date: 5/8/2017, 9:56:05 AM

To: afiman@utc.wa.gov;

From: CRMAdmSvc@utc.wa.gov

Subject: CAS-20417-Y7K6M8 has been Assigned to You CRM:0042145

Attachments: 0

Body:

CAS-20417-Y7K6M8

Activity Type: Email

Activity Date: 5/8/2017, 10:18:18 AM

To: Jerolyn.Ochs@CenturyLink.com;sclemen@utc.wa.gov;

From: afiman@utc.wa.gov

Subject: FW: RE: FW: WA UTC Complaint CAS-20417-Y7K6M8 for (4b)
[REDACTED] CRM:0043044

Attachments: 0

Body:

Good morning,
Bridgit Feeser responded to Phil Grate's request for a review and response. Per her response, the violations below stand. The complaint has been re-closed consumer upheld and the company should move forward with providing service to this customer under WAC 480-120-071.

Thank you,

Alice Fiman

Activity Type: Email

Activity Date: 5/8/2017, 10:19:12 AM

To: afiman@utc.wa.gov;

From: Jerolyn.Ochs@CenturyLink.com

Subject: Automatic reply: RE: FW: WA UTC Complaint CAS-20417-Y7K6M8 for (4b) CRM:0043044

Attachments: 0

Body:

I will be out of the office Friday 05/05/2017 -Monday 05/08/2017 returning Tuesday 05/09/2017 at 7:00 AM . If this is a commission request that demands immediate attention, please forward to the repository /mailbox for an immediate response.

This communication is the property of CenturyLink and may contain confidential or privileged information. Unauthorized use of this communication is strictly prohibited and may be unlawful. If you have received this communication in error, please immediately notify the sender by reply e-mail and destroy all copies of the communication and any attachments.

Activity Type: Email

Activity Date: 5/8/2017, 10:24:15 AM

To: (4b)

From: afiman@utc.wa.gov

Subject: RE: WA UTC Complaint CAS-20417-Y7K6M8 for (4b) CRM:0043032

Attachments: 0

Body:

Good morning,

CenturyLink requested a commission staff management review of this case and we determined the company in violation of the WAC and directed them to work with you on providing the service.

However, they have indicated they will ask for review by our commissioners.

At this point, we are closing the case but will keep you updated as we know more.

Thank you for contacting us and I do apologize we are unable to give you a more final answer at this time. Please let me know if you have any other questions. You can contact me via email at afiman@utc.wa.gov or call the toll-free hotline 1-888-333-9882 and be transferred to my office.

Alice Fiman, Consumer Protection Manager

Activity Type: Email

Activity Date: 5/10/2017, 10:52:28 AM

To: afiman@utc.wa.gov;

From: Jerolyn.Ochs@CenturyLink.com

**Subject: RE: FW: WA UTC Complaint CAS-20417-Y7K6M8 for [REDACTED] (4b)
[REDACTED] CRM:0043044**

Attachments: 1

Body:

Good afternoon-

Our regulatory counsel is escalating to Bridgette's report Pat.

I wanted you to be aware.

Thank you.

Activity Type: Activity

Activity Date: 5/22/2017, 10:00:00 AM

Contact:

Subject: email from company to UTC

Attachments: 1

Description:

From: Grate, Phil [mailto:Phil.Grate@CenturyLink.com] Sent: Monday, May 22, 2017 10:03 AM To: Hazzard, Pat (UTC) Subject: Meeting today at 1:30 Hi, Pat Attached is a letter that outlines what I'll discuss with you at our meeting today at 1:30. I will also bring you a color printout of it. See you at 1:30 Phil Phil Grate Director, Regulatory Affairs 1600 7th Avenue, Seattle, WA 98191 Office 206-345-6224 Wireless 425-301-8411

Activity Type: Activity

Activity Date: 5/22/2017, 1:00:00 PM

Contact:

Subject: Meeting with company and UTC

Attachments: 0

Description:

Activity Type: Email

Activity Date: 6/7/2017, 5:22:19 PM

To: afiman@utc.wa.gov;

From: [REDACTED] (4b)

Subject: RE: WA UTC Complaint CAS-20417-Y7K6M8 for [REDACTED] (4b)
CRM:0043032

Attachments: 0

Body:

Good afternoon,

It has now been one month since the last e-mail I have received (see below), and I am wondering what to expect. Are you (the PUC) out of the process now? How long should I be expected to wait for a decision from CenturyLink? We are going on six months now.

Thank you,
[REDACTED] (4b)

Activity Type: Email

Activity Date: 6/8/2017, 10:12:30 AM

To: [REDACTED] (4b);afiman@utc.wa.gov;

From: afiman@utc.wa.gov

Subject: RE: WA UTC Complaint CAS-20417-Y7K6M8 for [REDACTED] (4b)
CRM:0043032

Attachments: 0

Body:

Thank you for reaching out. I do apologize for the delay. The company escalated my decision to the UTC Director of Safety and Consumer Protection, and my understanding is that she plans to get her response to the company this week. The company may or may not choose to escalate the matter further after receiving her response.

Thank you again and I will notify you if we need any additional information.

Alice Fiman, UTC

Activity Type: Activity

Activity Date: 6/9/2017, 2:30:00 PM

Contact:

Subject: email to CenturyLink

Attachments: 1

Description:

From: Hazzard, Pat (UTC) Sent: Friday, June 9, 2017 2:16 PM To: Grate, Phil Subject: RE: Meeting today at 1:30 Hi Phil, Attached is my response to CenturyLink's request for a review of complaint CAS-20417-Y7K6M8. Thanks again for meeting to discuss this issue. Pat Hazzard Director, Safety and Consumer Protection 360-664-1114 (office) 360-489-8109 (mobile) phazzard@utc.wa.gov Utilities and Transportation Commission Respect. Professionalism. Integrity. Accountability. www.utc.wa.gov

Activity Type: Email

Activity Date: 7/5/2017, 1:32:14 PM

To: afiman@utc.wa.gov;

From: [REDACTED] (4b)

**Subject: RE: WA UTC Complaint CAS-20417-Y7K6M8 for [REDACTED] (4b)
CRM:0043032**

Attachments: 0

Body:

Hi Alice,

It's been almost another month. Do you have any info to pass along. Any idea as to how long this process will take?

Respectfully,

(4b)

Activity Type: Email

Activity Date: 7/14/2017, 2:30:20 PM

To: (4b)

From: afiman@utc.wa.gov

**Subject: RE: WA UTC Complaint CAS-20417-Y7K6M8 for (4b)
CRM:0043032**

Attachments: 0

Body:

Good afternoon. Unfortunately, I am not able to provide a timeline. Our business compliance unit is now working with the company to bring them into compliance. We have requested some additional information from the company on this business practice and the company has requested additional time to provide this information. The deadline for the company to provide this information is July 21. Once we get that information, we will proceed with our review of the company's business practice.

Again, I apologize I am not able to provide you any new information.

Alice Fiman

Activity Type: Email

Activity Date: 7/14/2017, 2:32:45 PM

To: afiman@utc.wa.gov;

From: [REDACTED] (4b)

Subject: RE: WA UTC Complaint CAS-20417-Y7K6M8 for [REDACTED] (4b)
CRM:0043032

Attachments: 0

Body:

Hi Alice,

Please accept my profound thanks for all you and your group are doing on our behalf.

Sincerely,
[REDACTED] (4b)

APPENDIX F

CENTURYLINK
1600 7th Avenue, Room 1506
Seattle, Washington 98191
(206) 345-6224
(425) 301-8411 (cell)
Email: phil.grate@centurylink.com

Philip E. Grate
State Regulatory Affairs Director
Public Policy



May 11, 2017

Transmitted Via Email Only

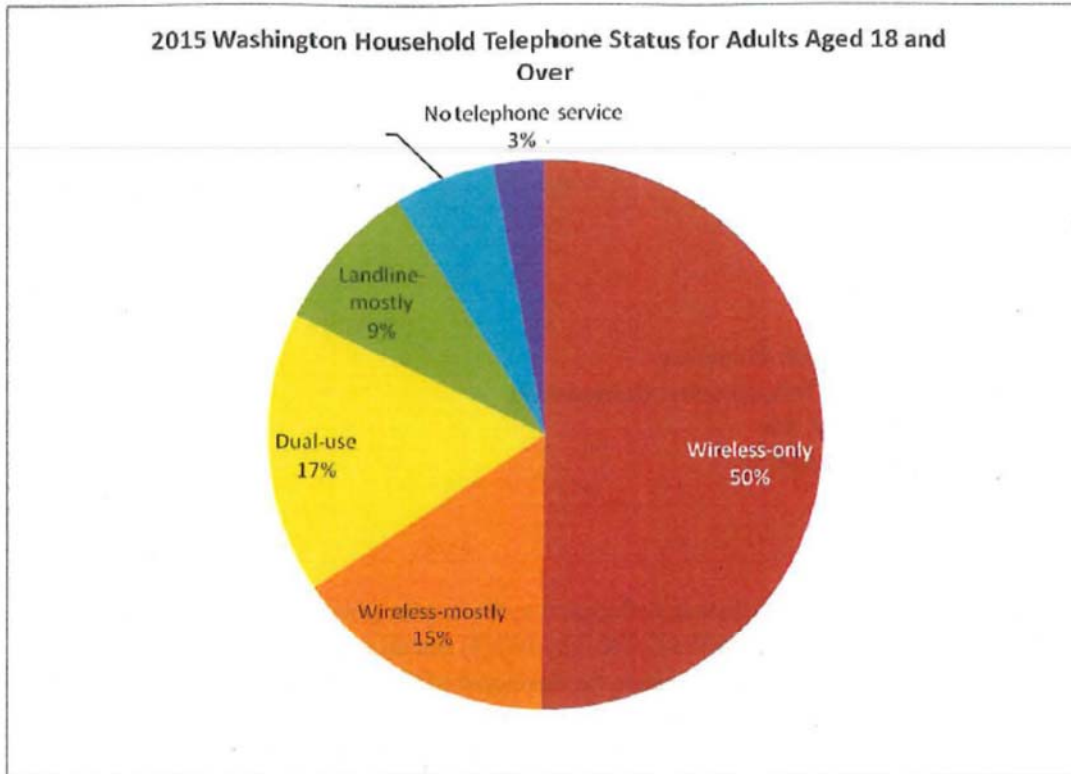
Bridgit Feeser
Assistant Director, Consumer Protection
Washington Utilities and Transportation Commission
1300 S Evergreen Park Dr. SW
Olympia, Washington 98504

Dear Bridgit:

Thanks for meeting with me Wednesday afternoon to discuss the policy issues concerning whether WAC 480-120-071(3) and WAC 480-120-071(4) should apply to a lot in a development where CenturyLink has no facilities because the developer of the development declined to enter into a Provisioning Agreement for Housing Development with CenturyLink. In this case there is also another provider offering wireline voice service to lots in the development.

The purpose of this letter is twofold. First, I mentioned when we met that I had prepared some data charts for the meeting that I forgot to bring with me. I have dropped those charts and a bit of commentary into this letter. Second, I will briefly summarize the points I tried to make Wednesday.

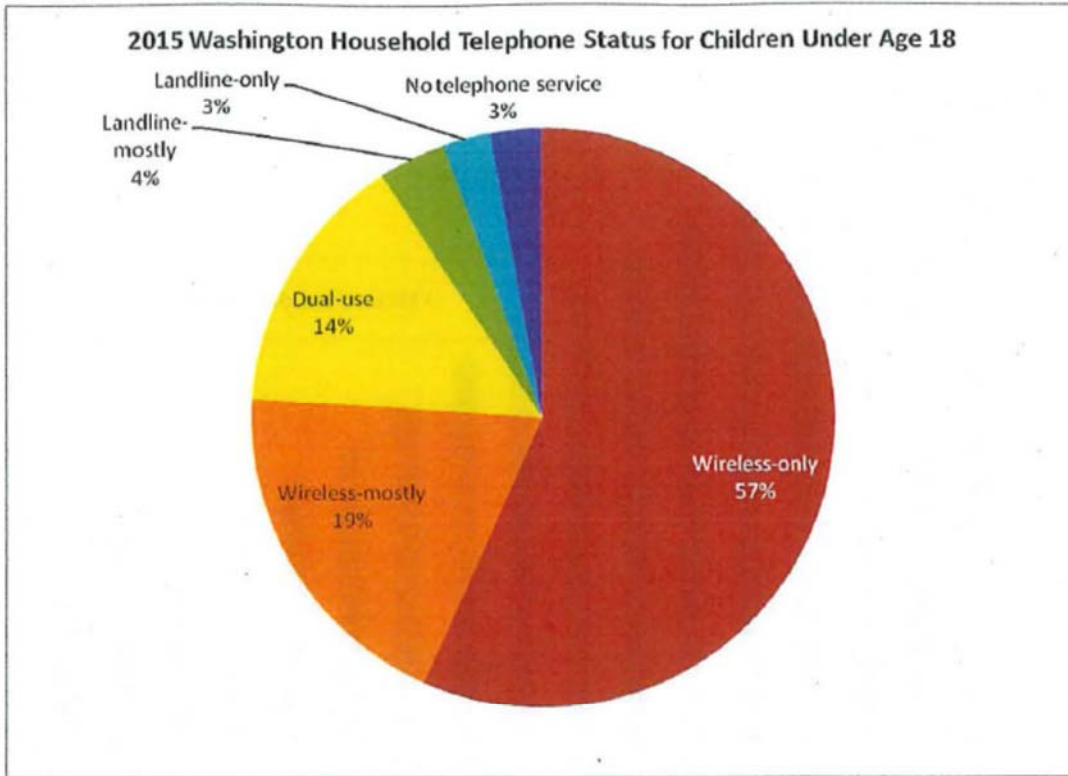
First, the charts.



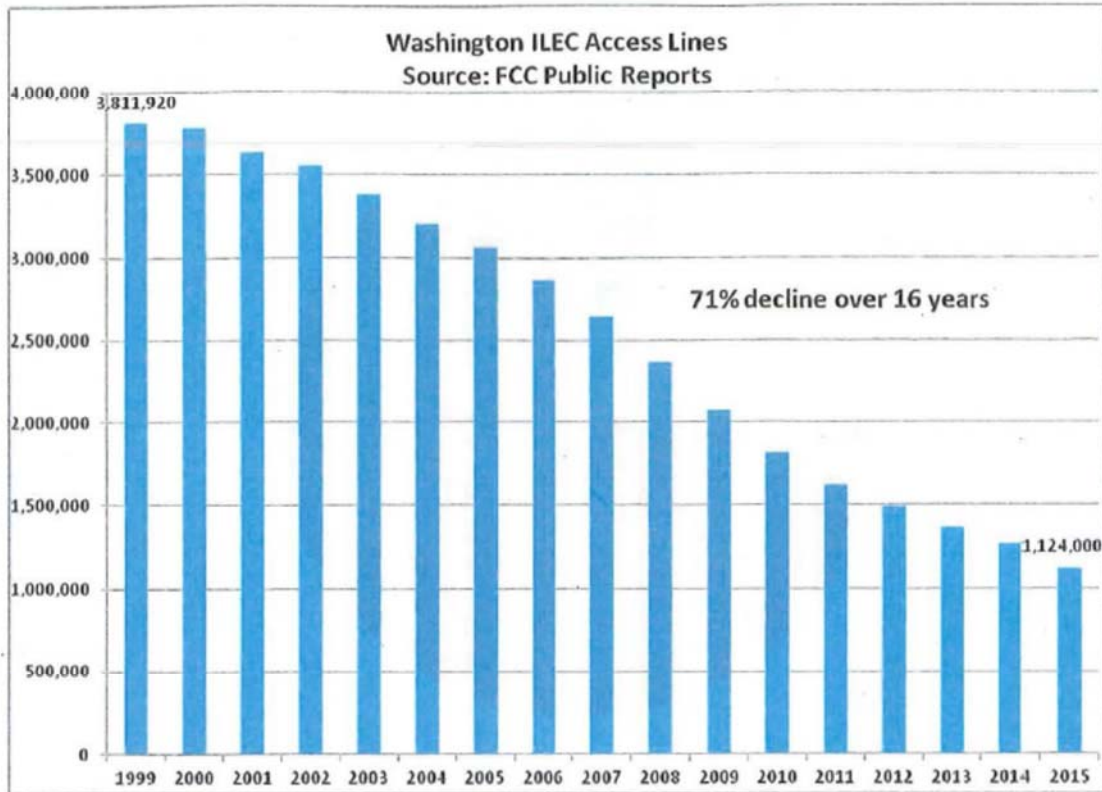
This is a chart of data from the National Center for Health Statistics National Health Interview Survey Early Release program. Here is a link to the [NHIS - National Health Interview Survey Homepage](#) and a link to the actual survey data in the chart.

http://www.cdc.gov/nchs/data/nhis/earlyrelease/wireless_state_201608.pdf

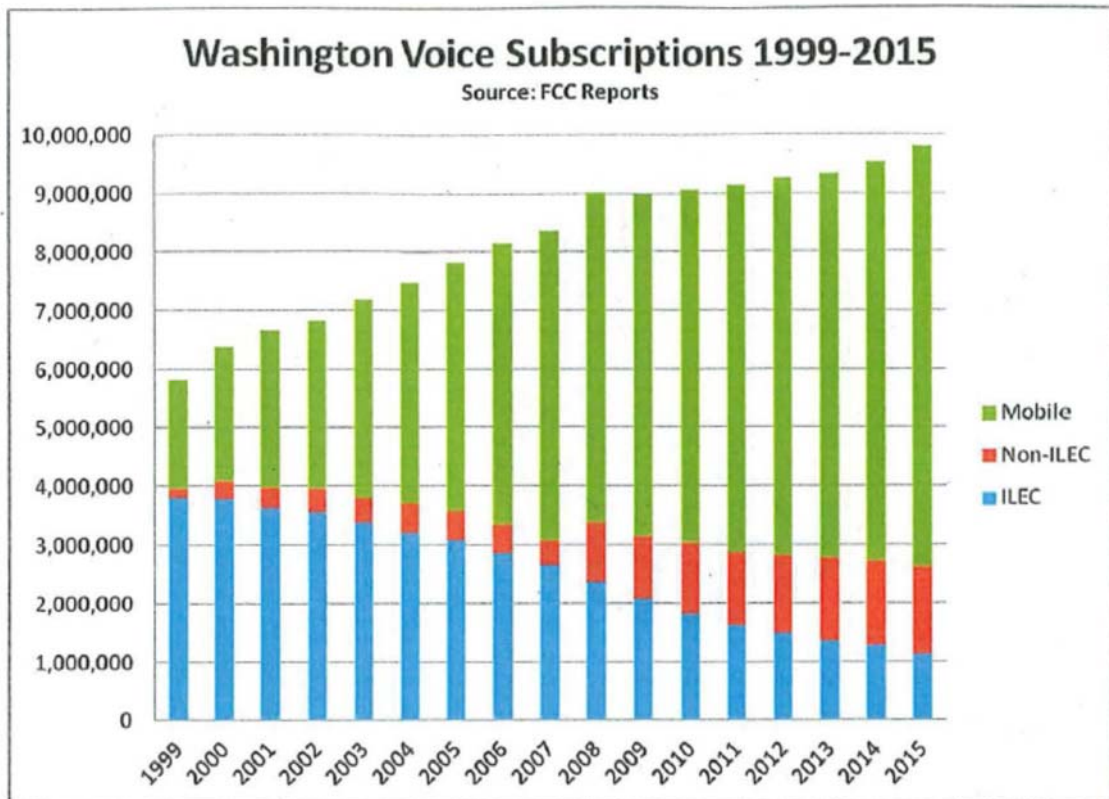
This NHIS data show that at the end of 2015, half of Washington households had no wireline phone service. The point is that wireless voice service is highly competitive with wireline voice service, a point the Commission recognized and endorsed in CenturyLink's AFOR proceeding when it accepted wireless service as a reasonably comparable substitute for wireline service.



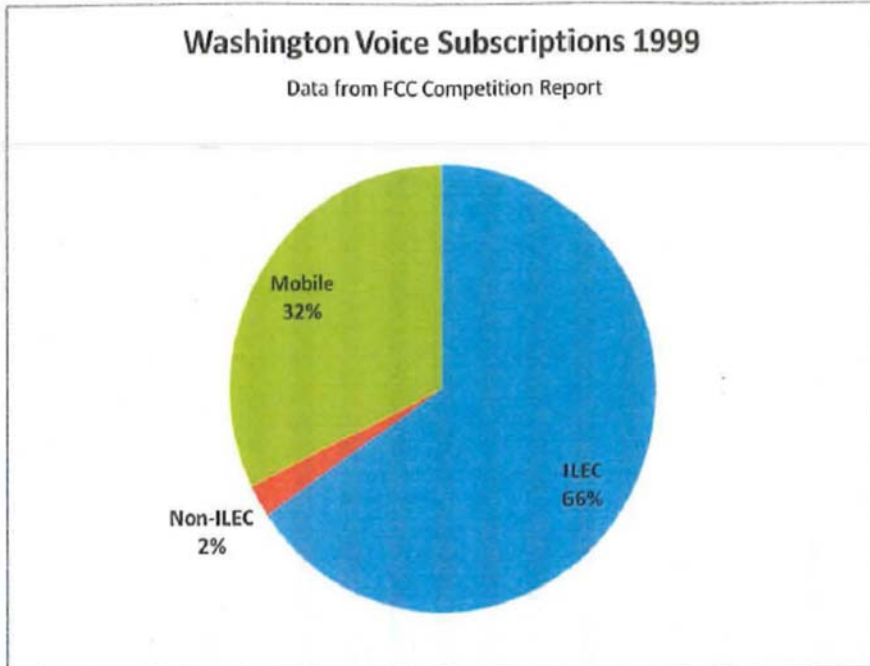
This chart shows that 76% of children under 18 rely exclusively or mostly on wireless voice.



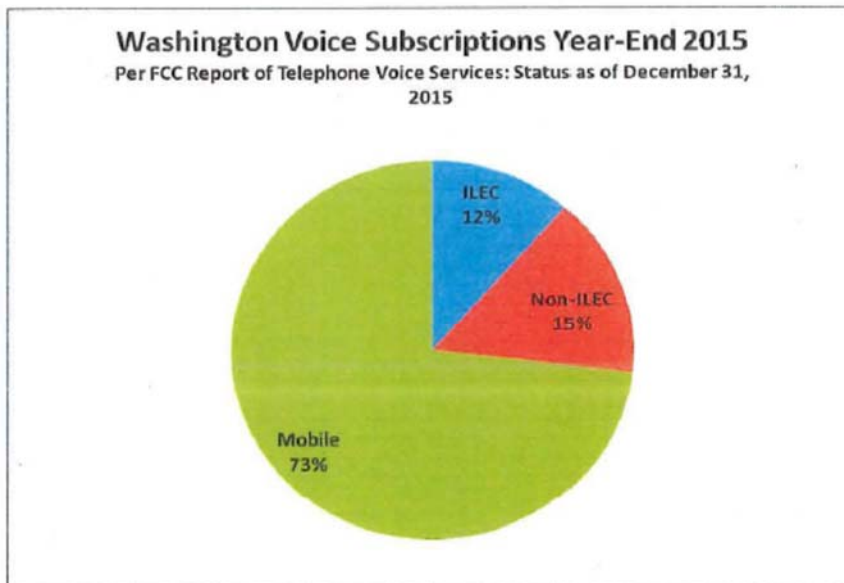
This chart shows public data taken from reports published by the FCC. The data show that Washington's Incumbent Local Exchange Carriers have lost 71% of the access lines they had in 1999.



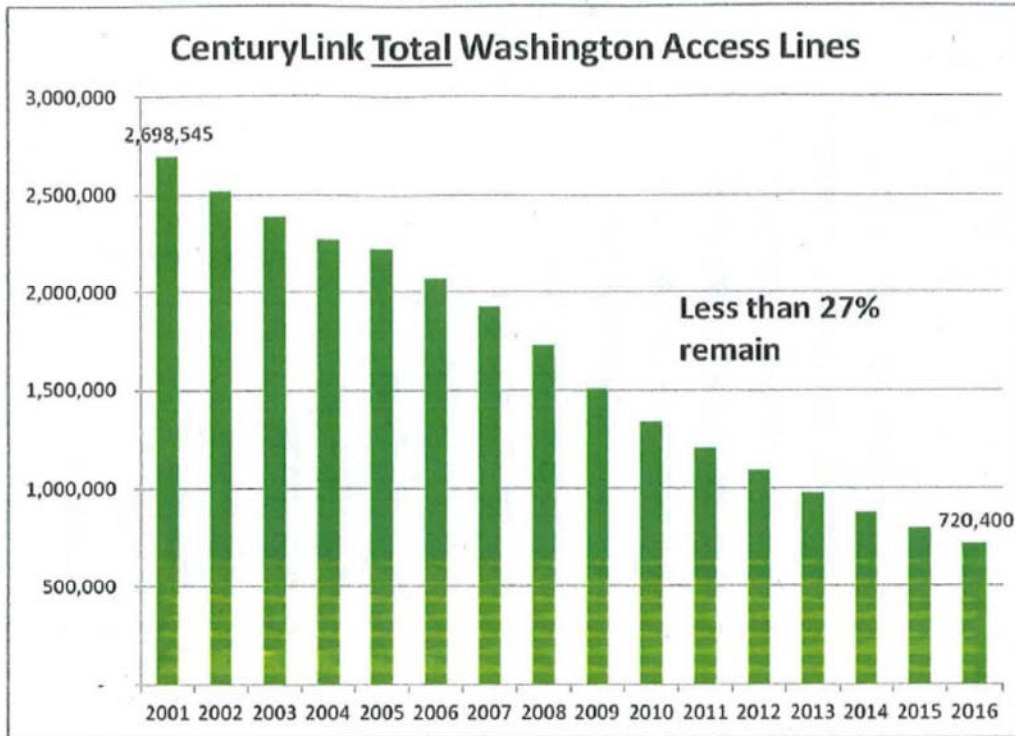
This chart, also taken from publicly available FCC data, shows the decline in ILEC voice subscriptions during the same period of time that non-ILEC and mobile voice service have grown. The same thing is happening nationwide.



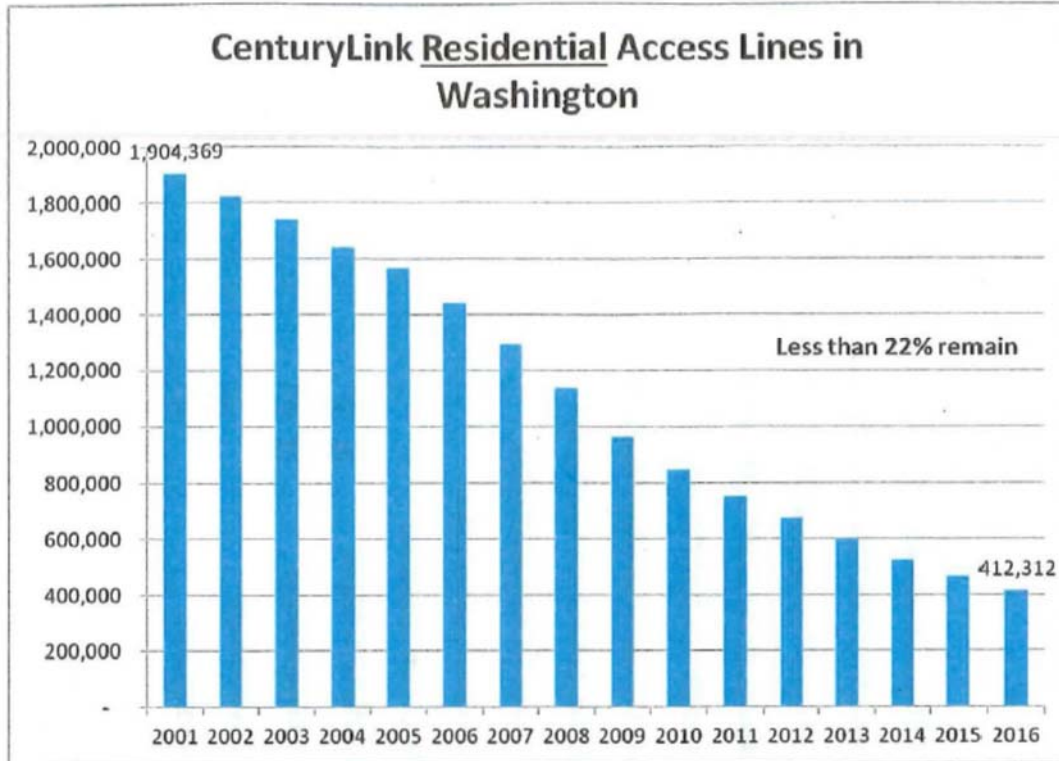
This is a pie chart of the 1999 data.



And this is the 2015 data. By the end of 2015, the once dominant ILECs had only 12% of the voice subscriptions in Washington.



This is a chart of CenturyLink only access lines. In just 15 years CenturyLink has lost 73% of the access lines it had in 2001.



This chart shows how CenturyLink's losses are more severe in the residential market. CenturyLink has lost 78% of its residential access lines in 15 years.

Qwest Corporation d/b/a CenturyLink QC
Annual Washington Intrastate Revenues

As reported on its Annual Report to the Washington Utilities and Transportation Commission

	Annual Report Schedule	Basic Local Service Revenue (\$1000's)	Annual Intrastate Revenue (\$1000's)	Annual Intrastate Revenues as a Percent of Calendar Year 2005 Annual Intrastate Revenues
2005	Sch. 1	573,522	801,421	100%
2006	Sch. 1	546,433	755,543	94%
2007	Sch. 1	506,980	705,772	88%
2008	Sch. 1	488,069	656,043	82%
2009	Sch. 1	435,007	574,735	72%
2010	Sch. 1	383,481	503,934	63%
2011	Sch. 1	349,129	450,560	56%
2012	Sch. 1	313,980	413,294	52%
2013	Sch. 1	282,804	372,820	47%
2014	Sch. 1	258,465	344,938	43%
2015	Sch. 1	242,866	325,629	41%
2016	Sch. 1	223,474	308,299	38%

This schedule shows how highly effective competition has eroded legacy Qwest's (CenturyLink QC) Washington revenues over the past 11 years. CenturyLink QC's 2016 Washington revenues are half a billion dollars less than its 2005 revenues and just 38% of the revenues generated in 2005.

The ongoing revenue loss is why it is important to shield CenturyLink from unnecessary line extension costs to lots in developments where other providers stand ready and willing to provide wireline service. Following is a summary of the public policy points I tried to make on Wednesday.

If the Commission interprets the WAC to require 1000' of free line extension to lots in developments where the developer could have entered into a provisioning agreement for housing development (PAHD) and didn't, that will de-incentivize future developers from entering into PAHDs because they will know that they can shift the cost of creating a path for our facilities onto CenturyLink through free line extensions into their developments. In that case, we might as well not have the PAHD requirements.

Bridgit Feeser
Assistant Director, Consumer Protection
April 21, 2017
Page 10

Requiring 1000' of free line extension to developments where wireline and wireless services are already available from other providers will waste the ILEC's very limited (and ever shrinking) resources that could be used for economically viable investments, including further deployment of broadband. CentryLink and other ILECs must be free to decline unnecessary uneconomic investment. This is especially important because the revenues available to operate a wireline voice network for people who have no other option continue their rapid decline.

The statute that gives rise to the Commission's line extension rule is RCW 80.36.090, Service to be furnished on demand, which, in pertinent part, provides:

Every telecommunications company shall, upon reasonable notice, furnish to all persons and corporations who may apply therefor *and be reasonably entitled thereto* suitable and proper facilities and connections for telephonic communication and furnish telephone service as demanded.

The word "reasonably" is important here. Our point is that if another telecommunications company is ready and willing to serve a lot in a development where the ILEC has no facilities, the entitlement to service is being met, and there is no reasonable entitlement to service from a second provider. This interpretation of "reasonably entitled" is more economically sound than an interpretation that assumes ILECs (which are now a very small part of the voice ecosystem) must serve any customer anywhere in their serving territory even when another telecommunications provider is already serving there.

Thanks again for meeting with me. I look forward to continuing our dialog about this important issue.

Sincerely,



Philip E. Grate

PEG/jga

APPENDIX G

CENTURYLINK
1600 7th Avenue, Room 1506
Seattle, Washington 98191
(206) 345-6224
(425) 301-8411 (cell)
Email: phil.grate@centurylink.com

Philip E. Grate
State Regulatory Affairs Director
Public Policy



May 22, 2017

Emailed and Hand Delivered

Pat Hazzard
Director, Safety and Consumer Protection
Washington Utilities and Transportation Commission
1300 S Evergreen Park Dr. SW
Olympia, Washington 98504

Dear Pat:

This letter addresses whether WAC 480-120-071(3) and WAC 480-120-071(4) should apply to a lot in a development where CenturyLink has no facilities because the developer of the development declined to enter into a Provisioning Agreement for Housing Development with CenturyLink. In this case there is also another provider offering wireline voice service to lots in the development.

The purpose of this letter is twofold. First, I offer some charted data that explain the recent history of the voice telecommunications marketplace in Washington. Second, I briefly summarize the public policy reasons why the better interpretation of WAC 480-120-071(3) and WAC 480-120-071(4) is that they do not apply to a lot in a development where the Incumbent Local Exchange Carrier (ILEC) has no facilities because the developer of the development declined to enter into a Provisioning Agreement for Housing Development with the ILEC.

First, the charts.

APPENDIX H



STATE OF WASHINGTON

UTILITIES AND TRANSPORTATION COMMISSION

1300 S. Evergreen Park Dr. S.W., P.O. Box 47250 • Olympia, Washington 98504-7250

(360) 664-1160 • www.utc.wa.gov

June 21, 2017

Phil Grate
CenturyLink
1600 7th Avenue, Room 1506
Seattle, WA 98191

Dear Mr. Grate:

The Utilities and Transportation Commission is conducting an investigation into how CenturyLink responds to requests for residential basic local exchange service that require an extension of service.

To complete this investigation, commission staff requests the following information from CenturyLink for the period of June 16, 2015, through June 15, 2017:

1. Has the company received requests for residential basic local exchange service from potential customers that it has denied because facilities necessary to provide service: (a) don't exist at the service location; (b) require installation; or (c) require maintenance or upgrades?

If the answer to (a), (b) or (c) is yes, please indicate the respective number of denials per:

- a. CenturyTel Local Exchange Operating company that provides service in Washington (i.e. Qwest Corporation, United Telephone Company of the Northwest, CenturyTel of Washington, CenturyTel of Cowiche, and CenturyTel of Inter Island); and
- b. Telephone Exchange.

For each denial, please provide the name and address of the individual requesting service.

2. Please provide all documents, including applications for extension of service, explanations of the extension of service rules, and cost estimates provided to applicants who requested residential basic local exchange service. With the documents, note the date these were processed and mailed.

Phil Grate
Century Link
June 21, 2017
Page 2

3. Please provide a copy of all scripts or written guidance provided to company customer service and sales representatives related to all residential basic local telephone exchange request scenarios, e.g. facilities exist at location and are serviceable, facilities don't exist at location, facilities require installation, etc.

Please provide all requested information by 5 p.m., June 30, 2017, in electronic format using Microsoft Word for narrative documents and Excel for data. Extension requests may be granted on a case-by-case basis. A request for extension must be made in writing prior to the deadline and must include the reasons for the extension.

The response should be directed to Susie Paul, Compliance Investigator. If you have questions regarding this request, the level of detail requested, or alternate data sets or alternate formats, please contact Ms. Paul at spaul@utc.wa.gov or 360-664-1111. Thank you for your attention to this matter.

Sincerely,

Steven V. King
Executive Director and Secretary

APPENDIX I

CenturyLink's July 25, 2017 responses to CP-1 and CP-2 regarding extensions of service.

1. Has the company received requests for residential basic local exchange service from potential customers that it has denied because facilities necessary to provide service: (a) don't exist at the service location; (b) require installations; or (c) require maintenance or upgrades?

If the answer to (a), (b) or (c) is yes, please indicate the respective number of denials by company:

Qwest

United Telephone Company of the Northwest

CenturyTel of Washington

CenturyTel of Cowiche

CenturyTel of Inter Island

For each denial, please provide the name and address of the individual requesting service.

Response: CenturyLink has determined that it does not retain records of service denials of this nature in a searchable database. In a development where the developer has not asked or allowed CenturyLink to deploy facilities, CenturyLink attempts to indicate in its own address records that service is not available at the addresses in that development. Because the line extension rule does not, in CenturyLink's view, pertain to extensions of service in developments, it is possible that other customers have contacted CenturyLink asking for service and have been told that service is not available in a development where the developer has refused to enter into a PAHD (provisioning agreement for housing developments). We are unaware of any instances where this occurred that the customer did not have service available from another provider.

2. Please provide all documents, including applications for extension of service, explanations of the extension of service rules, and cost estimates provided to applicants who requested residential basic local exchange service. With the documents, note the date these were processed and mailed.

Response: Line extensions of less than 1,000 feet do not generate these types of documents, and we do not have any records indicating that line extensions of more than 1,000 feet we received or responded to in the relevant two-year time period.

APPENDIX J

Paul, Susie (UTC)

From: Grate, Phil <Phil.Grate@CenturyLink.com>
Sent: Thursday, October 12, 2017 3:53 PM
To: Paul, Susie (UTC)
Cc: Anderl, Lisa
Subject: RE: Complaints

Hi, Susie,

We did not consider consumer complaints in our response for the timeframe of June 16, 2015 through June 15, 2017. We have since reviewed our database of consumer complaints which goes back only to the beginning of 2016. As I mentioned on the phone to you this morning, the database does not categorize complaints by the specific criteria of "denial of service." So we sorted for criteria we thought might reveal such complaints and found none. When we spoke this morning you mentioned the (4b) complaint. I admitted that the (4b) Complaint had not come up using the criteria for which we sorted. So we input the criteria for the (4b) complaint (primary criteria = "installation" and secondary criteria = "other") and found one other refusal of service complaint as follows.

Complaint ID: CAS-21842-B6V9L3
Served By: Susan Clemen
Opened On: 9/28/2017 11:45 AM

This complaint (which is current) is outside the timeframe you specified but we thought you'd want to know that the (4b) search criteria did reveal it.

We also reviewed the Roskelley complaint you mentioned.

Complaint ID: 124081
Served by: Sheri Hoyt
Opened on: 07/08/2015

Our file on the complaint indicates we extended service to Roskelley.

Please let me know if you have any other questions.

Regards,

Phil Grate

From: Paul, Susie (UTC) [mailto:spaul@utc.wa.gov]
Sent: Monday, October 09, 2017 2:57 PM
To: Grate, Phil <Phil.Grate@CenturyLink.com>
Subject: Complaints

Hi Phil,

In response to the June 21 data request, question 1 (below), was consumer complaints included in your response for the timeframe of June 16, 2015 through June 15, 2017?

1. Has the company received requests for residential basic local exchange service from potential customers that it has denied because facilities necessary to provide service: (a) don't exist at the service location; (b) require installation; or (c) require maintenance or upgrades?

If the answer to (a), (b) or (c) is yes, please indicate the respective number of denials per:

- a. CenturyTel Local Exchange Operating company that provides service in Washington (i.e. Qwest Corporation, United Telephone Company of the Northwest, CenturyTel of Washington, CenturyTel of Cowiche, and CenturyTel of Inter Island); and
- b. Telephone Exchange.

For each denial, please provide the name and address of the individual requesting service.

If you did not include customer complaints, please do so by Oct. 12. Please let me know if you have any questions.

Thanks,

Susie Paul
Compliance Investigations
(360) 664-1105 Office
spaul@utc.wa.gov

Utilities and Transportation Commission
Respect. Professionalism. Integrity. Accountability.
www.utc.wa.gov   

This communication is the property of CenturyLink and may contain confidential or privileged information. Unauthorized use of this communication is strictly prohibited and may be unlawful. If you have received this communication in error, please immediately notify the sender by reply e-mail and destroy all copies of the communication and any attachments.

APPENDIX K

Washington State Complaint: CAS-07460-J1J8H4

Company: CenturyLink Communications LLC

Industry: Telecommunications

Customer: (4b)

Alt Contact:

Account Number: 445244802

Service Phone:

E-mail Address: (4b)

Service Address: (4b) Wahkiakum WA 98612

Complaint: CAS-07460-J1J8H4

Type: Complaint

Serviced By: Sheri Hoyt

Grouped By: Refusal Of Service

Opened On: 7/7/2015, 9:00:00 PM

Closed On: 7/16/2015, 9:00:00 PM

Disposition: Consumer upheld

Violations Total: 0

TA Total: 0

Amount Customer Saved: \$0.00

Description:

Referred by Congresswoman Beutler On April 9, 2015, the customer contacted CenturyLink to order phone service be provided to his new home. It is new construction, just finished, and the first of the 25 lots in the development to be completed. The developer already installed the conduit and the customer believes the line extension is about 650 feet. CenturyLink assigned the customer a phone number, (4b) however, he was informed by telephone that providing service would not be cost effective to CenturyLink. The last the customer heard this issue has been forwarded to CenturyLink's Delayed Order division in Wisconsin. Originally, a CenturyLink engineer Jamie McCord (253-851-1259, jamie.mccord@centuryLink.com) came out and looked

at the area and told him the conduit was ready but it's now a question of whether CenturyLink would go to the expense of laying conduit. Ms. McCord was replaced as the assigned engineer by Dean Jacobson (253-851-1250, dean.jacobson@centurylink.com) but Mr. Jacobson has not returned any of the customer's calls or emails. The customer has called the Delayed Order desk at 855-481-8856 but has not received a return call. **Okay to contact the customer directly during the complaint process. *Please explain why this customer requested service in April 2015 and service has not been installed. *Please explain how CenturyLink processed this customer's April 9, 2015, request for service in accordance with WAC 480-120-071(3)(a) and (b). *When does CenturyLink anticipate service will be installed? 7/8, 11:51am)passed to CenturyLink via email. Response due 7/10, 5pm.

Result:

CenturyLink will install copper line only. The customer is less than 1000' feet form the nearest service pedestal so the line extension will be provided at no cost to him. There is currently no WAC that requires the service to be installed within a specific timeframe; however, I've advised the customer to contact me if the service is not installed within 13 months of his April 9, 2015, request date. CenturyLink will not install fiber to the premise as it is a low-growth area and CenturyLink does not find that to be a good (financial) decision for the company.

Violations

There are no violations for this case.

Activities

Activity Type: Email

Activity Date: 7/8/2015, 8:50:00 AM

To:

From:

Subject:

Attachments: 0

Body:

New URGENT complaint ((Forwarded complaint record)

Activity Type: Email

Activity Date: 7/10/2015, 11:25:00 AM

To:

From:

APPENDIX L

Construction Charges & Line Extensions

(Cons & Sm Bus)

Created: 11/13/15

Updated: 11/13/2015

Document Contents: Overview General Information Estimating Construction Charges Quoting Construction Charges	States: ALL Business Unit: Cons & Sm Bus
Overview – General Information	Top
<p>There are many situations that may require extra construction charges and many types of additional CenturyLink facilities (such as drop wire, pedestals, and cable) that may be required to provide the customer's service.</p> <p>It is up to the CenturyLink engineer or technician to determine what is needed and if extra construction charges are required. If service delays or additional construction charges are required, the engineer or technician will manage the customer notification and quote the additional charges.</p> <p>You are not required to determine if additional construction charges apply or what the actual extra construction charges may be.</p>	
Overview – Estimating Construction Charges	Top
<p>Customer Wants Estimate of Possible Construction Charges Without Placing an Order</p> <p>Prior to placing an order, a customer may want a cost estimate of possible construction charges to provide service to an address or property. They may indicate they are considering purchasing property or building on a remotely located property.</p> <p>The only way to provide possible construction charges without placing an order is for the customer to talk to a CenturyLink Engineer. Do not attempt to estimate charges for the customer by looking at Facility Check or other tools.</p> <ol style="list-style-type: none">1. Either warm transfer or give the customer the telephone number of the Developer Contact Group (DCG) at 1 800-526-3557.2. Instruct the customer to leave their name, call back number, address of the property including city and state, and their request for an engineer contact on the DCG voice mailbox.3. The DCG will call the customer back with the name and telephone number of the engineer they should contact for assistance.	
Overview – Quoting Construction Charges	Top
<p>If any of the following situations exist while placing an order, advise the customer that additional construction charges may apply.</p> <ul style="list-style-type: none">• Service address validation indicates facilities are available, however:<ul style="list-style-type: none">o The customer states that utility companies have quoted additional charges for their location, oro The customer comments that the location is unusual, such as being remote, hard to get to, the home is very old, or the location has not had service for many years• Service address validation shows:<ul style="list-style-type: none">o The address is outside the base rate areao Facilities are not available for any or all lines that the customer is ordering. <p>This may indicate a need for new construction (with associated construction charges) even though Facility Check may indicate that facilities are available. Do not tell the customer that there will be no construction charges.</p> <p>When placing the order:</p> <ol style="list-style-type: none">1. Place the order with a normal due date.	

Process Owner: C Gilstrap

Published by: C Gilstrap

Path: State > Exchange > Products & Services > Access Lines > Construction Charges

Page 1

2. Include a note on the order with a description of any of the above situations.
3. Quote the normal nonrecurring charges for the products the customer has ordered.
4. Explain to the customer that if additional construction charges apply, they will be quoted by the CenturyLink engineer or technician.

Customer Contact Information

[Top](#) | [Line Extension Charges](#)

The Market Unit Sales and Service Consultants are not required to determine with any certainty if customers ordering service may be liable for Line Extension Charges. Complete information will be given to individual customers by the engineers if the order will be delayed pending facility construction.

If any of the following situations exist, consultants should advise the customer that additional charges may apply:

- The customer is establishing new service in an area that is shown in TAG as outside the Base Rate Area.
- TAG shows SAG only on an address outside the Base Rate Area.
- Facility Check indicates that facilities are not available for any or all lines that the customer is ordering.

Do not quote or estimate any dollar amounts for possible charges. If LECs apply, the engineer will give the customer the amount of the charges and will negotiate payment arrangements.

Line Extension Charge Order Process

[Top](#) | [Line Extension Charges](#)

In general (some states have different processes) this is the order flow when LEC is involved:

1. Market Unit consultant issues the order.
2. The order drops out in FACS for lack of facilities.
3. The Line Provisioning Center (LPC) advises the customer of the delay and of possible additional construction charges.
4. The LPC forwards the order (via RTT) to the engineers who determine whether and how much LEC will be billed.
5. Engineers give LEC info to the customer with a rate quote and send the customer a billing agreement to sign.
6. Customer returns the agreement and any advance payment that may be required. In some states the advance payment is forwarded to the Remittance Processing Service (PRS). RPS applies the payment to the customer's account when it becomes active.
7. The agreement is forwarded to BART billing group, which generates a separate bill to the customer.
8. Engineers draw up an engineering job and send it to construction.
9. When the job is completed, construction notifies the engineers and the LPC, which negotiates a new due date with the customer and releases the order for dispatch and completion.

APPENDIX M

From: Jari Tanninen [mailto:Jarit@prairieelectric.com]
Sent: Monday, April 11, 2016 2:16 PM
To: Janson-Moe, Michelle <Michelle_Janson-Moe@cable.comcast.com>; 'ted_syfrett@cable.comcast.com' <ted_syfrett@cable.comcast.com>; 'Lance Cheeley (l2c@nwnatural.com)' <l2c@nwnatural.com>; 'Susan Grenier@Centurylink' <Susan.Grenier@centurylink.com>; 'Heather.Frymire@CenturyLink.com' <Heather.Frymire@CenturyLink.com>; 'david.tucker@corning.com' <david.tucker@corning.com>; Robin Vandeurzen (rlv@nwnatural.com) <rlv@nwnatural.com>; 'Larry McDonald (Larry.McDonald@Centurylink.com)' <Larry.McDonald@Centurylink.com>; 'Tyler Wade (Tyler.Wade@CenturyLink.com)' <Tyler.Wade@CenturyLink.com>; Nicholas A. Flagg <NFlagg@clarkpud.com>; Keith.Meisner@CenturyLink.com
Cc: 'David Denny@Min&Glaes' <dad@mgsurvey.com>; Joe Hiblar <joeh@prairieelectric.com>; 'Walter (wtc@nwnatural.com)' <wtc@nwnatural.com>; 'Mike@NWNatural' <mwm@nwnatural.com>; 'L2c@nwnatural.com' <L2c@nwnatural.com>; 'c4c@nwnatural.com' <c4c@nwnatural.com>; 'kag@nwnatural.com' <kag@nwnatural.com>; 'Roger Binns (rcb@nwnatural.com)' <rcb@nwnatural.com>; 'Craig Galvin(cag@mgsurvey.com)' <cag@mgsurvey.com>; Randy Lipe <randy.l@prairieelectric.com>; Scott Halberg <scotth@prairieelectric.com>; 'CSA@mgsurvey.com' <CSA@mgsurvey.com>; Heartwell, Becca <Becca.Heartwell@nwnatural.com>; Kelley, Brian <Brian.Kelley@nwnatural.com>; Thayer Hendrickson <thayerh@prairieelectric.com>

Subject: Anna Marie Lane Subdivision(800218) UTILITY(Centurylink) File Xfer

Here is the FINAL/REVISED electrical utility design for Anna Marie Lane Subdivision(505211).

Utility Notes:

Hardcopies will be going out in the mail.

Let me know if you have any questions....

Thanks,

Jari Tanninen

PRAIRIElectric Inc. | 6000 NE 88th St Vancouver, WA 98665 | Phone:360.573.2750

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For more information please visit <http://www.symanteccloud.com>
