

**BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION,

Complainant,

v.

CENTURYTEL OF INTER ISLAND, INC. D/B/A  
CENTURYLINK,

Respondent.

DOCKET UT-132234

**REVISED FILING IN COMPLIANCE WITH  
ORDER NO. 03; SAN JUAN COUNTY  
COMMUNICATIONS PLAN; STATEWIDE  
COMMUNICATIONS PLAN; AND  
REGISTER OF ALL MEETINGS, CALLS,  
AND OTHER ANCILLARY STEPS TAKEN**

**BACKGROUND**

- 1 CenturyTel of Inter Island, Inc. d/b/a CenturyLink (“CenturyLink”) provides telecommunications services including, but not limited to, basic local exchange service to the public in San Juan County in the state of Washington.
- 2 On November 5, 2013, CenturyLink customers in San Juan County experienced a loss of toll calls, data communications, and local calls due to a break in an underwater fiber cable connecting Lopez Island with the main switch on San Juan Island.
- 3 On November 5, 2014, the regulatory staff (“Staff”) of the Washington Utilities and Transportation Commission (“Commission”) filed a complaint against CenturyLink. The complaint alleged a number of violations of WAC 480-120-412, the Commission rule related to major outages, and recommended the Commission assess a penalty of up to \$173,210.

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4 On June 2, 2015, CenturyLink, Staff, and the Public Counsel Section of the Washington Office of the Attorney General (“Public Counsel”) filed a full Settlement Agreement. On June 26, 2015, the parties filed a revised Settlement Agreement (“Settlement”) and supporting Joint Testimony.

5 The Settlement provides for, among other things:

- the development of a San Juan County Emergency Communication Plan;
- the development of a Washington State Emergency Communications Plan, in collaboration with Staff and Public Counsel

6 In Order No 03, entitled “FINAL ORDER ACCEPTING AND ADOPTING SETTLEMENT AGREEMENT WITH CONDITIONS,” in WUTC Docket UT-132234, the Commission accepted and adopted the Settlement with three conditions, two of which are pertinent here:

- 1) CenturyLink shall extend an invitation to the Washington Military Department to participate in the drafting of the Washington State Emergency Communications Plan;
- 2) The parties shall file the San Juan County Emergency Communications Plan and the Washington State Emergency Communications Plan within three months of the effective date of this Order, in accordance with paragraph 30 below, as well as a reasonably detailed register of all meetings, calls, and other ancillary steps taken to develop such plans.

7 Order No. 3 explains the Settlement’s provisions regarding the Communications Plans as follows:

[T]he Settlement establishes a framework for development and implementation of two Emergency Communications Plans, one to address San Juan County and the other to address the entire state. For the San Juan County emergency communications plan, the Company commits to meet with Staff and Public Counsel, as well as any representatives of the County DEM and the Washington Military Department that wish to attend, to formulate an emergency communications plan for San Juan County that is responsive to the requirements in WAC 480-120-412. The Settlement provides for one meeting to take place in

San Juan County within six months of this Order's effective date, with Staff initiating, coordinating, and facilitating the meetings.

...

Similarly, CenturyLink commits to working with Staff and Public Counsel to develop a statewide emergency communications plan to address any future Washington outages consistent with WAC 480-120-412. The Settlement provides for one meeting to take place at the Commission's headquarters in Olympia within six months of this Order's effective date, with Staff initiating, coordinating, and facilitating the meetings.

## **DEVELOPMENT OF THE PLANS**

### **MEETINGS**

- 8 In accordance with Order No. 3, Staff initiated, coordinated, and facilitated a meeting in Friday Harbor in San Juan County on December 9, 2015 that was attended by, among others, representatives of Staff, Public Counsel, the ~~Project and Operations Manager of the E911 Unit~~ Deputy State E911 Coordinator in the State E911 Coordinator's Office ("SECO") of the Emergency Management Division of the Washington Military Department (~~"E911 Unit manager"~~), the Director of San Juan County/Town of Friday Harbor Department of Emergency Management ("San Juan EM Director"), the San Juan County E911 County Coordinator, and CenturyLink ("Friday Harbor meeting").
- 9 Staff also initiated, coordinated, and facilitated a meeting at the Commission's headquarters in Olympia on December 15, 2015 that was attended by representatives of Staff, Public Counsel, ~~SECO~~ the E911 Unit Manager and CenturyLink ("Olympia meeting").

### **THE ISSUE OF THE NAME OF THE PLANS**

- 10 At the Friday Harbor meeting the San Juan EM Director explained that an emergency communications plan was the purview of an emergency management department or

division. A local telephone company such as CenturyLink would more properly have an “outage notification” or communications plan because the plan contains procedures to disseminate information to the public, public officials, and news media during an outage (which may or may not constitute an emergency). At the Olympia meeting ~~the E911 Unit manager~~ SECO reiterated this point. Consequently, the parties agreed that the title of both communications plans should use the word “Outage” rather than “Emergency.” The use of “outage” instead of “emergency” in the plans’ titles also comports with WAC 480-120-412, which consistently refers to major outages, not emergencies.

### **THE PLANS**

- 11 The parties also concluded that any procedures established in a statewide outage communications plan should also apply to San Juan County and that, therefore, the outage communications plan for San Juan County should consist of the statewide outage communications plan with procedures for disseminating information that are unique to San Juan County appended to it.
- 12 The Settlement calls for creation of a statewide outage communications plan to be followed by all subsidiaries of CenturyLink that provide basic local exchange service in Washington, not just CenturyTel of Inter Island. Accordingly, the statewide outage communications plan applies to major outages of telephone service in Washington provided by CenturyTel of Inter Island, Inc., CenturyTel of Cowiche, Inc., CenturyTel of Washington, Inc., and Qwest Corporation. CenturyTel of Inter Island is the only CenturyLink subsidiary that provides local exchange service in San Juan County. Thus, the San Juan County outage communications plan applies to CenturyTel of Inter Island, Inc., only.

**COMPLIANCE ATTACHMENTS**

13 In compliance with Order No. 03, attached to this compliance filing are the following:

**Attachment A** - Statewide Outage Communications Plan;

**Attachment B** - San Juan County Outage Communications Plan;

**Attachment C** - Register of all meetings, calls, and other ancillary steps taken.

Respectfully submitted this 1<sup>st</sup> day of March 2016.

CENTURYLINK

/s/ Lisa A. Anderl

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