

**BEFORE THE WASHINGTON  
UTILITIES & TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

Complainant,

v.

CENTURYLINK COMMUNICATIONS, LLC

Respondent.

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DOCKET UT-210902

**CROSS-ANSWERING TESTIMONY OF COREY J. DAHL  
ON BEHALF OF THE  
WASHINGTON STATE OFFICE OF THE ATTORNEY GENERAL  
PUBLIC COUNSEL UNIT**

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**EXHIBIT CJD-5C**

CenturyLink Response to Public Counsel Data Request No. 2 with Confidential  
Attachment PC-2C

**February 17, 2023**

**Shaded information is Designated as Confidential per Protective Order in Docket  
UT-210902**

To: Public Counsel  
Re: Docket UT-210902  
CenturyLink's Responses to Public Counsel DR Nos. 1-7  
January 26, 2023  
Page 4 of 9

**PC-2 Re: Response Testimony of Peter J. Gose, Exh. PJG-1T, at 8:7-8.**

**Please provide the following information:**

- a) Explain in detail what it means to run "several custom scripts."**
- b) Define what it means to "extract potential suspensions and disconnections."**
- c) Provide copies of all the "several custom scripts."**
- d) Please provide documentation for all of the training CenturyLink conducted for customer service agents to run the "custom scripts." Include when the training was conducted, how it was conducted, how many employees attended, what job classifications attended, and the percentage of employees in each relevant job classification attended. If the percentage of employees in each relevant job classification is less than 100%, please explain why in detail. If no training was provided for specific scripts, please explain why in detail.**

**RESPONSE:**

- a) Running "several custom scripts" means that the company ran new scripts, which are small sections of software or programming, to extract necessary data regarding suspensions and disconnections.
- b) To "extract potential suspensions and disconnections" means to remove ordinarily-applicable suspensions or disconnections from the collections queue in order to prevent those collection actions from occurring.
- b) CenturyLink objects to this data request on the basis that it is overly broad and unduly burdensome. Without waiving its response, CenturyLink responds as follows:

See Confidential Attachments PC-2a (Ensemble) and PC-2b (CRIS).

- c) CenturyLink objects to this data request on the basis that it is overly broad and unduly burdensome. Without waiving its response, CenturyLink responds as follows:

Customer service agents did not run the custom scripts. The scripts were run by personnel in the IT and credit risk departments to effectuate the requirements of proclamation directives. Based on its diligent search, CenturyLink was able to find one document regarding the development of "custom scripts." See Confidential Attachment PC-2c for the internal run document/checklist utilized by IT in connection with the custom scripts.

**Respondent(s): CenturyLink Legal  
Peter Gose, Director State and Local Government Affairs  
Jason Kien, Director Marketing**

Attachment PC-2c  
To CenturyLink Response to Public Counsel  
Data Request No. 2

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