

**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-7**

CenturyLink Response to Public Counsel Data Request No. 9

**February 17, 2023**

To: Public Counsel  
Re: Docket UT-210902  
CenturyLink's Responses to Public Counsel DR Nos. 8-9  
January 31, 2023  
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**PC-9 Re: Regulatory Compliance.**

**Please refer to the Commission's Enforcement Policy (Docket A-120051) at paragraph 8, which states,**

**In order to facilitate compliance, the Commission expects companies to have a compliance program in place. A compliance program should include personnel whose stated job responsibilities include understanding and implementing Commission statutory and regulatory requirements. The program also should designate personnel responsible for interacting with the Commission on enforcement matters and should also include systems and programs to detect and correct violations and to report those violations to company management.**

**Please respond to the following:**

- a) Explain in detail the Company's efforts to implement the Commission's expectation of compliance programs expressed above.**
- b) How many compliance personnel did the Company employ on a monthly basis in 2020 in line with the Commission's expectations in the Policy Statement?**
- c) How many compliance personnel does the Company currently employ in line with the Commission's expectations in the Policy statement?**
- d) Did the Company "designate personnel responsible for interacting with the Commission on enforcement matters" in 2020? If not, please explain in detail.**
- e) Does the Company currently "designate personnel responsible for interacting with the Commission on enforcement matters"? If not, please explain in detail.**
- f) Please describe with particularity the Company's "systems and programs to detect and correct violations and to report those violations to company management" in 2020. If the Company has no such systems and programs, please explain.**
- g) Please describe with particularity the Company's "systems and programs to detect and correct violations and to report those violations to company management" that are currently in place. If the Company has no such systems and programs, please explain.**

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**RESPONSE:**

CenturyLink objects to Public Counsel Data Request No. 9 on the basis that it is overly broad, unduly burdensome and is neither relevant to the issues in this proceeding nor reasonably calculated to lead to the discovery of admissible evidence. Without waiving its objections, CenturyLink responds as follows:

The formal compliance program referred to in paragraph 8 of the Commission Enforcement Policy (Docket A-120061) presumes the prior existence of a violation. See paragraph 7: "When the Commission or Staff finds a violation, the company has an obligation to correct the particular violation. The company has the further obligation to correct the underlying system or program problems that caused the violation to occur. It is not sufficient to correct only the instant violation."

In this case, CenturyLink was not required or expected to have a formal "compliance program" in place prior to the discovery of the fact that it had inadvertently disconnected and suspended a small percentage of customers in 2020 and 2021. That discovery was not made until after the expiration of the Governor's Proclamation, and thus there was no longer a compliance obligation in existence.

While the company did not have a formalized "compliance program" in effect during the pendency of the Governor's Proclamation, it took extraordinary steps to suppress normal collections activities and successfully prevented the vast majority of involuntary disconnects and suspensions (for non-payment) of residential voice customers in Washington. The company's efforts are more thoroughly described in the Prefiled Response Testimony of Peter Gose (dated November 18, 2022) and in the company's responses to Public Counsel data requests 1-7 (dated January 26, 2023). Successfully suppressing the overwhelming majority of suspensions and disconnections was extremely challenging in light of the unique circumstances facing the company during the height of the COVID-19 crisis.

With regard to the company's compliance staffing, see CenturyLink's response to Public Counsel Data Request No. 8.

**Respondent(s):** CenturyLink Legal  
**Knowledgeable witness:** Peter Gose