

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION STAFF
RESPONSES TO DATA REQUESTS

DATE PREPARED: September 22, 2022

WITNESS: Commission Staff

DOCKET: UT-181051

RESPONDER: Commission Staff

REQUESTER: CenturyLink

CENTURYLINK DATA REQUEST NO. 36:

Does Mr. Webber believe that Comtech was and is ultimately responsible for managing its networks in a prudent manner? If your answer is other than yes, fully explain your response.

RESPONSE:

Staff objects to this request as overbroad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence, and/or not proportionate to the needs of the case. Staff further objects to this request to the extent it requests more than is required by the Commission's rules and orders. Staff further objects to this data request to the extent that the information it seeks is protected by attorney client privilege and/or the work product doctrine. Staff further objects to this request to the extent it seeks speculative and/or hypothetical information. Staff further objects to this request to the extent that it is beyond the scope of Witness Webber's testimonies.

Without waving the above objections, Staff responds as follows:

All network managers, including CenturyLink and Comtech, are responsible for managing their networks in a prudent manner. Witness Webber's opinions regarding the issues addressed in the proceeding are presented in his testimonies.