

**BEFORE THE WASHINGTON  
UTILITIES & TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,

Complainant,

v.

CENTURYLINK COMMUNICATIONS, LLC,

Respondent.

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DOCKET UT-181051

**STEPHANIE K. CHASE**

**ON BEHALF OF THE  
WASHINGTON STATE OFFICE OF THE ATTORNEY GENERAL  
PUBLIC COUNSEL UNIT**

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**Exhibit SKC-2**

CenturyLink's Response to Public Counsel Data Request No. 2

**December 15, 2021**

To: Public Counsel  
Re: Docket UT-181051  
CenturyLink's Responses to Public Counsel DR Nos. 1-6  
April 22, 2021  
Page 3 of 9

- PC-2 Staff's Investigation Report states that CenturyLink asserted that the company was "unaware of any 911 service outages in Washington experienced by any entity to which CenturyLink provided 911 services."
- a) At the time of the outage, CenturyLink retained responsibility for 15 PSAPs. Did CenturyLink confirm with these entities that they were, in fact, receiving 911 calls throughout the duration of the outage?
  - b) Did CenturyLink perform any diagnostic tests or analyses to determine that the 15 PSAPs under CenturyLink's management at the time of the outage were able to receive 911 calls as normal during the outage? If so, please provide the results of those tests and any reports CenturyLink prepared regarding those results.
  - c) Did CenturyLink analyze the number of calls received by the 15 PSAPs under CenturyLink's responsibility during the outage? If so, please provide the results of this analysis. If CenturyLink did not perform such an analysis, please provide an explanation why the company did not.
  - d) Did CenturyLink compare these call volumes against the same time period in previous years? If so, please provide the results of this analysis. If CenturyLink did not perform such an analysis, please provide an explanation why the company did not.
  - e) Does CenturyLink believe that no one in the areas served by the 15 PSAPs under CenturyLink's management at the time of the outage attempted to call 911 during the outage? If so, what is the basis for this belief?
  - f) How would CenturyLink typically become aware that there is a 911 service outage experienced by an entity for which it provided 911 service?

**RESPONSE:**

- a) No. CenturyLink received no alarms indicating problems with any of the 15 PSAPs, and received no inquiries from those PSAPs. There was no reason to believe the network event was affecting the CenturyLink PSAPs.
- b) No. See CLC's response to PC-2(a).
- c) It is unclear whether Public Counsel is asking whether CLC performed (at the time of the network event) an analysis of call volumes to the CenturyLink PSAPs, or whether Public Counsel is asking if such an analysis was done after the fact. No, CLC did not perform that analysis during the time of network event. See CLC's response to PC-2(a). Yes, CLC later analyzed (on an hour-by-hour basis) the total number of calls to the 15 CenturyLink PSAPs occurring December 27, 2018 through December 29, 2018. See CLC's responses to PC-1 and PC-6.

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April 22, 2021  
Page 4 of 9

- d) No. See CLC's response to PC-2(a).
  
- e) No, CLC does not believe that "no one in the areas served by the 15 PSAPs under CenturyLink's management at the time of the outage attempted to call 911 during the outage." See CLC's response to PC-1, PC-2(c) and PC-6. This belief is validated by the fact that 911 calls to the 15 CenturyLink PSAPs completed during this time frame.
  
- f) During the time that CenturyLink was a 911 service provider in Washington, it would become aware of an outage affecting 911 service to its PSAP by Circuit alarm, CDR alarm, Probe alarm, an Intrado alarm and/or contacts from the affected PSAP(s).

**Respondent: Carl Klein, Manager Public Safety Services**