



**Bob Ferguson**  
**ATTORNEY GENERAL OF WASHINGTON**

Public Counsel

800 Fifth Ave • Suite 2000 • MS TB-14 • Seattle, WA 98104-3188 • (206) 464-7744

July 14, 2021

**SENT VIA WEB PORTAL**

Mark L. Johnson  
Executive Director and Secretary  
Washington Utilities and Transportation Commission  
621 Woodland Square Loop SE  
Lacey, Washington 98503

Re: *WUTC v. CenturyLink*, December 2018 911 Outage  
Docket UT-181051  
**Public Counsel Response to Motion for Third-Party Discovery**

Dear Mr. Johnson:

Public Counsel submits the following response to the Motion for Third-Party Discovery (“Motion”) on behalf of CenturyLink Communications, LLC (“CenturyLink” or “Company”), pursuant to the Washington Utilities and Transportation Commission’s (“Commission”) Notice of Opportunity to Respond to Motion for Third-Party Discovery filed on July 13, 2021.

Public Counsel takes no position on the motion requesting the issuance of subpoenas to TeleCommunications Systems, Inc. d/b/a Comtech Telecommunications Corp. and Transaction Network Services, Inc. by the Commission.

Sincerely,

/s/

NINA SUETAKE  
Assistant Attorney General  
Public Counsel  
(206) 389-2055

NMS/KMB

Enclosures

cc: Service List (E-mail)

Received  
Records Management  
07/14/21 15:36:13  
State Of WASH.  
UTIL. AND TRANSP.  
COMMISSION

**CERTIFICATE OF SERVICE**

**DOCKET UT-181051**

***WUTC v. CenturyLink (December 2018 911 Outage)***

**I HEREBY CERTIFY** that I have this day served *the Response to the Motion for Third-Party Discovery on behalf of Public Counsel* upon all parties of record in this proceeding, by electronic transmission to the email address(es) or by mailing a true and correct copy, postage prepaid, to each party or party representative listed in the Commission's master service list for this docket.

HC = Receives Highly Confidential; C = Receives Confidential; NC = Receives Non-Confidential

**COMMISSION STAFF:**

Harry Fukano, [harry.fukano@utc.wa.gov](mailto:harry.fukano@utc.wa.gov)  
Sally Brown, [sally.brown@utc.wa.gov](mailto:sally.brown@utc.wa.gov)

Office of the Attorney General  
Utilities & Transportation Commission  
621 Woodland Square Loop S.E.  
P.O. Box 40128  
Olympia, WA 98504-0128

**CENTURYLINK COMMUNICATIONS LLC**

David Namura, [david.namura@centurylink.com](mailto:david.namura@centurylink.com)  
Adam Sherr, [adam.sherr@centurylink.com](mailto:adam.sherr@centurylink.com)  
Josie Addington, [josie.addington@centurylink.com](mailto:josie.addington@centurylink.com)

CenturyLink Communications, LLC  
1600 7<sup>th</sup> Avenue  
Seattle, WA 98191

**WASHINGTON STATE MILITARY  
DEPARTMENT (WMD):**

Dawn Cortez, [dawn.cortez@ATG.WA.GOV](mailto:dawn.cortez@ATG.WA.GOV)  
Office of the Attorney General  
Transportation and Public Construction Division  
P.O. Box 40113  
Olympia, WA 98504-0113

Dated at Seattle, Washington this 14th day of January, 2021.

/s/



KEVIN BURDET  
Legal Assistant  
Public Counsel Unit