

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. 21:**

Identify and describe all of Mr. Akl's experience manufacturing, designing, deploying, configuring or maintaining DTN, DTN-X or comparable Dense Wavelength Division Multiplex (DWDM) networks.

**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 on the basis that the material sought by the request is: (a) not in Staff's possession, custody, or control; (b) already in the Company's possession, custody, or control; (c) publicly available; and/or (d) obtainable from some other source that is more convenient, less burdensome, or less expensive. 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 request to the extent it seeks the confidential, copyrighted, and/or privileged information of third parties.

Without waving the above objections, Staff responds as follows:

Dr. Akl's experience is in his CV (Akl, Exh. RA-2).