

**BEFORE THE WASHINGTON  
UTILITIES AND TRANSPORTATION COMMISSION**

**Docket UT-181051**

*Washington Utilities & Transportation Commission v. CenturyLink Communications, LLC*

**RESPONSE OF PUBLIC COUNSEL TO CENTURYLINK  
DATA REQUEST NO. 3**

Request No: 3  
Directed to: Public Counsel  
Date Received: January 12, 2022  
Date Produced: January 27, 2022  
Prepared by: Stephanie Chase  
Witnesses: Stephanie Chase

**DATA REQUEST NO. 3.**

At page 13 of her Direct Testimony (Exhibit SKC-1T), Ms. Chase states “Moreover, CenturyLink deployed only a single person to attend WMD’s conference call line addressing the outage and not mobilize its 9-1-1 Network and Center Operations team. Because CenturyLink did not use the ‘all hands on deck’ approach that is industry practice, resolution was likely delayed.”

- a. Please describe what is meant by an “all hands on deck” approach, and identify all literature or standards of which you are aware that recommend and define this approach.
- b. Identify and produce all documents supporting Ms. Chase’s assertion that CenturyLink did not use an “all hands on deck” approach.
- c. Does Public Counsel contend that the “single person” referenced in the quote above was the only CenturyLink employee working to investigate and resolve the network event? Fully explain your answer and produce all documents supporting it.
- d. Identify and produce all documents supporting Ms. Chase’s assertion that resolution was likely delayed by CenturyLink’s staffing actions.

**RESPONSE:**

The response in each subpart below, is in answer to the corresponding subparts in CenturyLink’s Data Request 3, above.

- a. Brian Rosen’s testimony describes an “all hands on deck” approach at page 17. According to Rosen, it is “industry practice” that companies and 9-1-1 officials bring “their best people to hunt the problem wherever it may be without regard to blame.” Rosen, Exh. BR-1CTr at 17.
- b. Rosen’s testimony, supported by his review of data request responses and the UTC Staff Investigation report, states that CenturyLink did not “indicate it mobilized its 9-1-1 Network and Center Operations team.” Rosen, Exh. BR-1CTr at 18.

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Re: Docket UT-181051  
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- c. No. Public Counsel does not contend that there was only one CenturyLink employee working to address the network event. Public Counsel contends that CenturyLink did not “indicate it mobilized its 9-1-1 Network and Center Operations team.” Rosen, Exh-BR-1CTr at 18.
- d. Stephanie Chase’s assertion that the resolution of the outage was likely delayed is supported by Rosen’s assessment that if CenturyLink had “applied additional resources, it is possible that they could have restore 9-1-1 services sooner than 49 hours and 32 minutes.” Rosen, Exh. BR-1CTr at 18.