

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION STAFF
RESPONSES TO DATA REQUESTS

DATE PREPARED: January 27, 2022
DOCKET: UT-181051
REQUESTER: CenturyLink

WITNESS: Jacque Hawkins-Jones
RESPONDER: Jacque Hawkins-Jones
TELEPHONE: (360) 664-1105

REQUEST NO. 15:

Ms. Hawkins-Jones's testimony claims that CenturyLink should have notified its PSAPs about the outage. Does Staff still take the position that CenturyLink had an obligation to notify its PSAP of CenturyLink's network issues even if 911 calls destined to that particular PSAP were completing? If your response is anything other than no, please fully explain your response.

RESPONSE TO REQUEST NO. 15: 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 calls for the disclosure of: (a) Staff counsel's legal analysis, legal conclusions, and/or mental impressions; (b) documents and/or information protected by the attorney-client privilege; and/or (c) protected work product. Staff further objects to this request to the extent it is premature and requests more than is required by the Commission's rules and orders. Staff is in the process of issuing, reviewing, and analyzing the ongoing discovery in this matter. The discovery deadline is not until June 29, 2022. Staff, in conjunction with its counsel, will continue its investigation and analysis of case materials and documents furnished (as well as those yet to be produced) in discovery for potential use at hearing. The exhibit filing deadline is not until August 4, 2022. Staff reserves the right to supplement and/or amend its response and/or file exhibits as set forth in the procedural schedule in this case.

Subject to and without waiving the above objections, Staff provides the following response:

Yes. Given that the outage was intermittent, occurred over several days, and was state-wide, Staff maintains that CenturyLink should have notified all PSAPs that remained on its network during the outage. Furthermore, even if an area was not experiencing service impairment, the residents of that area may travel to other areas that were experiencing service impairment. Hawkins-Jones, Exh. JHJ-1CT at 9:1-7 (citing Hawkins-Jones, Exh. JHJ-8) (discussing attempt of an individual to contact 911 after a car accident while driving to work). See WAC 480-120-412.