

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. 13:

At page 3 of her Direct Testimony, Ms. Hawkins-Jones states “CenturyLink maintained statewide responsibility for the underlying network and infrastructure elements of the state’s E911 system, including inter- and intrastate E911 date and call transmission from other carriers and service providers.”

- a. Identify all facts and produce all documents supporting Ms. Hawkins-Jones’s assertion that “CenturyLink maintained statewide responsibility for the underlying network and infrastructure elements of the state’s E911 system, including inter- and intrastate E911 date and call transmission from other carriers and service providers.”
- b. Regarding the Washington 911 system at the time of the December 2018 outage:
 - (1) Does Staff contend that CenturyLink, at the time of the outage, was responsible for network equipment and facilities directly deployed by Comtech?
 - (2) Does Staff contend that CenturyLink, at the time of the outage, was responsible for network equipment and facilities deployed by Comtech’s vendors on Comtech’s behalf? If your response is anything other than no, please fully explain your response.
 - (3) Does Staff contend that Comtech, at the time of the outage, was responsible for network equipment and facilities deployed by Comtech? If your response is anything other than yes, please fully explain your response.
 - (4) Does Staff contend that Comtech, at the time of the outage, was responsible for network equipment and facilities deployed by Comtech’s vendors on Comtech’s behalf? If your response is anything other than no, please fully explain your response.

RESPONSE TO REQUEST NO. 13(a): 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 on the basis that the material sought by the request is: (a) already in the Company’s possession, custody, or control; (b) publically available; and/or (c) obtainable from some other source that is more convenient, less burdensome, or less expensive. Staff further objects to this request to the extent it is premature and requests more than is required by the Commission’s rules and

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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:

See Hawkins-Jones, Exh. JHJ-3C at 8; fn 18 (citing CenturyLink WMD Contract, E09-196, Amendment M (Confidential)). See also, Staff Investigation Report, Appendix D (Confidential); Rosen, Exh. BR-1CTr at 7:10-16; Rosen, Exh. BR-4C.

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RESPONSE TO REQUEST NO.13(b)(1)-(4): 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 on the basis that the material sought by the request is: (a) already in the Company's possession, custody, or control; (b) publically available; and/or (c) obtainable from some other source that is more convenient, less burdensome, or less expensive. 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:

- (1) Ms. Hawkins-Jones did not take a position on this issue in her testimony. See Hawkins-Jones, Exh. JHJ-1CT.
- (2) Ms. Hawkins-Jones did not take a position on this issue in her testimony. See Hawkins-Jones, Exh. JHJ-1CT.
- (3) Ms. Hawkins-Jones did not take a position on this issue in her testimony. See Hawkins-Jones, Exh. JHJ-1CT.
- (4) Ms. Hawkins-Jones did not take a position on this issue in her testimony. See Hawkins-Jones, Exh. JHJ-1CT.