

WUTC DOCKET: 181051  
EXHIBIT: JHJ-1CT (R)  
ADMIT  W/D  REJECT

**Exh. JHJ-1CT**  
**Docket UT-181051**  
**Witness: Jacque Hawkins-Jones**  
**REDACTED VERSION**

**BEFORE THE WASHINGTON  
UTILITIES AND TRANSPORTATION COMMISSION**

**WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION,**

**Complainant,**

**v.**

**CENTURYLINK  
COMMUNICATIONS, LLC.,**

**Respondent.**

**DOCKET UT-181051**

**TESTIMONY OF**

**JACQUE HAWKINS-JONES**

**STAFF OF  
WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION**

*Customer Impact, Call Estimate, Penalty Recommendation, PSAP Communication*

**December 15, 2021**

**CONFIDENTIAL PER PROTECTIVE ORDER IN DOCKET UT-181051  
REDACTED VERSION**

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## LIST OF EXHIBITS

- Exh. JHJ-2C Overview of Phase 1 of the Three-Phase Migration Project
- Exh. JHJ-3C Narrative of Staff Investigation Report, dated December 2020
- Exh. JHJ-4 Narrative of Federal Communication Commission Investigation Report
- Exh. JHJ-5 A copy of CenturyLink's data response, dated Jan. 30, 2019
- Exh. JHJ-6 A copy of CenturyLink's Facebook post, dated Dec. 28, 2018
- Exh. JHJ-7 KIRO 7 News Article Regarding King County Sheriff's Office, dated Jan. 22, 2019
- Exh. JHJ-8 Email from Benton County Citizen to Washington State Office of the Attorney General
- Exh. JHJ-9 Email from Skagit County Citizen to Washington State Office of the Attorney General
- Exh. JHJ-10 *Wash. Utils. & Transp. Comm'n v. Centurytel of Inter Island, Inc. d/b/a CenturyLink*, Docket UT-132234, Order 03 (Oct. 20, 2015)
- Exh. JHJ-11 *Wash. Utils. & Transp. Comm'n v. Centurytel of Inter Island, Inc. d/b/a CenturyLink*, Docket UT-132234, Order 06 (June 1, 2017)
- Exh. JHJ-12 *Wash. Utils. & Transp. Comm'n v. Qwest Corp. d/b/a CenturyLink QC*, Docket UT-140597, Order 03 (Feb. 22, 2016)
- Exh. JHJ-13 *In re Notice of Transaction and Application of CenturyLink*, Docket UT-170042, Order 03 (July 27, 2017)
- Exh. JHJ-14 *Wash. Utils. & Transp. Comm'n v. Centurytel of Inter Island, Inc. d/b/a CenturyLink*, Docket UT-190209, Order 03 (June 25, 2020)
- Exh. JHJ-15 CenturyLink Served Public Safety Answering Point Responses
- Exh. JHJ-16 CenturyLink Served Public Safety Answering Point Response - Spokane Regional Emergency Communications

1 **I. INTRODUCTION**

2

3 **Q. Please state your name and business address.**

4 A. My name is Jacque Hawkins-Jones, and my business address is 621 Woodland  
5 Square Loop S.E., Lacey, Washington, 98503. My business mailing address is P.O.  
6 Box 47250, Olympia, Washington, 98504-7250. My business email address is  
7 Jacque.Hawkins-Jones@utc.wa.gov.

8

9 **Q. By whom are you employed and in what capacity?**

10 A. I am employed by the Washington Utilities and Transportation Commission  
11 (Commission) as a Compliance Investigator in the Compliance Investigations  
12 Section of the Consumer Protection Division.

13

14 **Q. How long have you been employed by the Commission?**

15 A. I have been employed by the Commission since August 2019.

16

17 **Q. Please state your qualifications to provide testimony in this proceeding.**

18 A. I have an associate degree from Olympic College and I am a certified investigator for  
19 the state of Washington. I have approximately eight years of experience as an  
20 investigator with regulatory agencies in the state of Washington. As a compliance  
21 investigator in the Consumer Protection Section, I have conducted numerous  
22 investigations related to the business practices of regulated utility or transportation  
23 companies, including telecommunications companies.

1 **Q. Have you testified previously before the Commission?**

2 A. Yes. I have testified in other enforcement proceedings involving Commission  
3 regulated transportation industries, including Docket TV-200029 and Docket TV-  
4 190835, which involved testimony related to companies operating as household  
5 goods carriers without the required Commission-issued permit.

6

7 **II. SCOPE AND PURPOSE OF TESTIMONY**

8

9 **Q. How did you become familiar with the matters in this proceeding?**

10 A. I was assigned to work with the Commission's Regulatory Staff (Staff) to investigate  
11 whether CenturyLink Communications, LLC d/b/a Lumen Technologies Group  
12 (CenturyLink or Company) violated any state laws or regulations in connection with  
13 the December 2018 Enhanced 911 (E911) outage. I am one of the co-authors of the  
14 Staff Investigation Report that provided the evidentiary basis for the Commission's  
15 complaint.

16

17 **Q. What is the scope and purpose of your testimony?**

18 A. I focus my testimony on the Washington residents affected by the December 2018  
19 CenturyLink 911 outage. Specifically, I address CenturyLink's failure to contact  
20 Public Safety Answering Points (PSAPs) regarding the December 2018 major  
21 outage. I also discuss the impact of the outage on consumers and the number of calls  
22 impacted by the outage. Importantly, I also discuss Staff's revised recommended  
23 penalty, based on the number of calls impacted and the Company's failure to notify

1 PSAPs about the major outage. Finally, I discuss Staff's follow up communication  
2 with the PSAPs that were served by CenturyLink at the time of the outage.

### 3 4 **III. DISCUSSION**

#### 5 6 **A. Background**

7  
8 **Q: Please describe Washington's 911 system at the time of the outage?**

9 A: CenturyLink was the major incumbent Local Exchange Carrier (LEC) offering  
10 telephone, data, and other services in the state of Washington. Additionally,  
11 CenturyLink maintained statewide responsibility for the underlying network and  
12 infrastructure elements of the state's E911 system, including inter- and intrastate  
13 E911 data and call transmission from other carriers and service providers.  
14 In 2004, Qwest Corporation contracted with West to provide E911 services in  
15 Washington and other states. The contract required both Qwest and West to comply  
16 with all applicable state, federal, county, and local ordinances, regulations, and  
17 codes.

18 In June 2009, the Emergency Management Division within the Washington  
19 Military Department (WMD), contracted with CenturyLink to develop and maintain  
20 an Internet Protocol-enabled Emergency Service Information Network infrastructure  
21 (ESInet 1).

22 On March 14, 2011, the Commission issued Final Order 14 in Docket UT-  
23 100820, approving and adopting, subject to conditions, a multiparty settlement  
24 agreement authorizing CenturyLink to acquire indirect control of Qwest Corporation,

1 Qwest LD Corp. and Qwest Communications Company LLC. CenturyLink assumed  
2 all of Qwest’s responsibilities under the contract.

3 The WMD, Emergency Management Division, oversees all E911 services in  
4 Washington state. In 2009, it contracted directly with CenturyLink to provide E911  
5 services through ESInet 1. CenturyLink has contracted some functions of the E911  
6 network to Colorado-based West, CenturyLink’s E911 Automatic Location  
7 Identification (ALI) database provider.

8 In June 2016, WMD’s Emergency Management Division, contracted with  
9 TeleCommunication Systems, Inc. (TSYS) to build, maintain, and operate a  
10 nationally compliant Next Generation 911 Emergency Services Internet Protocol  
11 Network (ESInet 2) and assume responsibility for processing E911 calls in  
12 Washington state. This required a service agreement between TYSY and  
13 CenturyLink to provide cooperation and ongoing support during the three-phase  
14 transition.

15

16 **Q: At the time of the December 2018 outage, what was the status of the transition**  
17 **of 911 service from CenturyLink to TSYS?**

18 A: As part of the Washington Military Department’s (WMD) Emergency Management  
19 Division’s contract with TSYS to build, maintain, and operate the next generation  
20 911 emergency service in Washington state, WMD implemented a three-phase  
21 migration approach to transition Washington’s 62 PSAPs from CenturyLink’s ESInet  
22 1 to TSYS’s ESInet 2. Phase one of the transition involved switching or “migrating”

1 PSAPs from CenturyLink’s network to TSYS’s network.<sup>1</sup> At the time of the outage,  
2 CenturyLink and TSYS were still in phase one of the transition.

3

4 **Q. Please briefly describe the December 2018 E911 outage.**

5 A. As detailed in Staff’s report, early on the morning of December 27, 2018,  
6 Washington residents experienced a major outage affecting wireline  
7 telecommunications companies, wireless cellular providers, and Voice over Internet  
8 Protocol (VoIP) providers.<sup>23</sup> The outage also affected the state’s E911 system,  
9 severely disrupting emergency and public safety communications in Washington.  
10 The outage resulted in a loss of access to the state E911 system in all 39 counties  
11 across 62 Primary Public Safety Answering Points (PSAP) in Washington. The  
12 outage affected a total of 7,427,570 Washington state residents.

13 The E911 system failed for 49 hours and 32 minutes over a three-day period,  
14 with sporadic outages throughout the state until all services were restored at 9:01  
15 p.m. PST on December 29, 2018.

16

17 **B. Major Outage Notification**

18

19 **Q. Please explain how the Commission defines “major outage.”**

20 A. WAC 480-120-021 defines a major outage as “a service failure lasting for thirty or  
21 more minutes that causes the disruption of local exchange or toll services to more

---

<sup>1</sup> Hawkins-Jones, Exh. JHJ-2C.

<sup>2</sup> See generally Hawkins-Jones, Exh. JHJ-3C.

<sup>3</sup> See generally Hawkins-Jones, Exh. JHJ-4.



1 than one thousand customers; total loss of service to a public safety answering point  
2 or emergency response agency; intercompany trunks or toll trunks not meeting  
3 service requirements for four hours or more and affecting service; or an intermodal  
4 link blockage (no dial tone) in excess of five percent for more than one hour in any  
5 switch or remote switch.”

6

7 **Q: Was the December 2018 outage a major outage?**

8 A. Yes. The December 2018 outage was an outage of CenturyLink’s local exchange  
9 services, lasting a total of 49 hours and 32 minutes, and affecting more than 7.4  
10 million residents in the state of Washington. Therefore, this outage meets the  
11 definition of a major outage as set forth in state rule, including WAC 480-120-021.

12

13 **Q: Does the occurrence of a major outage create additional obligations on the part**  
14 **of a telecommunication’s company?**

15 A: Yes. WAC 480-120-412 requires that, “[w]hen a [telecommunications] company  
16 receives notice of or detects a major outage, it *must* notify the commission and any  
17 PSAP serving the affected area *as soon as possible*.”<sup>4</sup> It also requires a company to  
18 notify the county E911 coordinators, the state emergency management authority,<sup>5</sup>  
19 and the public.<sup>6</sup>

20

21

---

<sup>4</sup> WAC 480-120-412(2) (emphasis added).

<sup>5</sup> WAC 480-120-412(3).

<sup>6</sup> WAC 480-120-412(5).

1 **Q: Did CenturyLink contact the PSAPs that it served after detecting the December**  
2 **2018 outage?**

3 A: No. In CenturyLink’s response to Staff data request, it did not provide any records of  
4 such external communications, because the Company claimed it was unaware of any  
5 E911 service outages in Washington experienced by any entity to which  
6 CenturyLink provided E911 service during the time of the outage.<sup>7</sup>

7  
8 **Q: Do you have reason to believe that CenturyLink was aware of the December**  
9 **2018 outage while the outage was still ongoing?**

10 A. Yes. Staff found a post on CenturyLink’s Facebook page that acknowledged some  
11 911 service disruptions affecting various areas throughout the United States.<sup>8</sup>  
12 However, there was no communication regarding the major outage to any of the  
13 PSAPs CenturyLink served once it detected or received notice of the outage.

14  
15 **Q: Based on your investigation, how many PSAPs was CenturyLink required to**  
16 **contact regarding the December 2018 outage?**

17 A: CenturyLink managed, and therefore needed to contact, 15 PSAPs in the state of  
18 Washington concerning the December 2018 outage.<sup>9</sup>

19  
20  
21

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<sup>7</sup> Hawkins-Jones, Exh. JHJ-5 at 1, 3-4.

<sup>8</sup> Hawkins-Jones, Exh. JHJ-6.

<sup>9</sup> Hawkins-Jones, Exh. JHJ-5 at 3.

1           **C.     Washington State Customer Impact**

2

3           **Q.     Please describe the December 2018 outage’s impact on CenturyLink’s**  
4           **Washington customers.**

5           A.     Staff’s investigation found that *all* 7.4 million residents of Washington state were  
6           potentially impacted by the December 2018 statewide E911 outage. During the  
7           December 2018 outage, all Washington residents lost the ability to access E911 in  
8           the event of an emergency.

9                     Access to reliable emergency services is absolutely vital to all Washington  
10           state residents. The inability to reach emergency services through E911 is a serious  
11           and potentially fatal event.

12                    In the case of this particular service outage, CenturyLink was fortunate only  
13           in that no major natural or human-caused disasters or incidents occurred during the  
14           timeframe of the outage. If such an event had occurred, the lack of functioning E911  
15           services could have been catastrophic.

16                    Actual Washington customers were, in fact, impacted by the December 2018  
17           outage. For example, KIRO 7 News reported that the King County Sheriff’s Office  
18           failed to receive an emergency call from an alarm company about a break-in at a  
19           SeaTac bank occurring during the December 2018 outage. Staff confirmed the  
20           accuracy of KIRO’s reporting with the King County Sherriff’s Officer quoted in  
21           KIRO’s article.<sup>10</sup>

22

1 Another example of the impact the December 2018 outage had on  
2 Washington customers occurred in Benton County, where an individual driving in  
3 the early morning hours on December 28 hit a patch of ice and rolled his vehicle  
4 three times. The individual tried to call 911 multiple times but was unable to  
5 connect. Ultimately, the individual had to have a family member contact Washington  
6 State Patrol through a non-emergency line. Luckily, he reported only minor  
7 injuries.<sup>11</sup>

8 Yet another example occurred in Skagit County, where an individual  
9 attempted to call 911 after catching a prowler in their yard upon returning home. The  
10 individual called 911 multiple times only to receive a busy signal each time. The  
11 individual's significant other chased the prowler away before police arrived.<sup>12</sup>

12 These are only a few examples of the harmful impact to Washington state  
13 customers caused by CenturyLink's failure to provide its customers the most  
14 important and vital telecommunication service from the perspective of public safety,  
15 the ability to dial 911 and have that call routed directly to public safety resources and  
16 authorities, as required by WAC 480-120-450(1). Due to the statewide E911 service  
17 outage and CenturyLink's failure, the safety of Washington residents was severely  
18 threatened, and loss of life could have occurred.

19  
20 **Q. Has the Commission previously commented on the importance of 911 services to**  
21 **customers in Washington?**

---

<sup>11</sup> Hawkins-Jones, Exh. JHJ-8.

<sup>12</sup> Hawkins-Jones, Exh. JHJ-9.

1 A. Yes, the Commission previously commented on the importance of 911 services in  
2 several orders.

3 In Docket UT-132234, regarding a 10-day interruption of long distance and  
4 911 services to residents in San Juan County, the Commission issued Order 03,  
5 approving a settlement agreement.<sup>13</sup> As part of the settlement agreement, the  
6 Commission required the parties to file a Washington State Communications Plan  
7 and assessed a penalty of \$173,210 against CenturyLink, suspending \$123,210 on  
8 the condition that CenturyLink did not violate WAC 480-120-412 or the provisions  
9 of the emergency communications plan for one year from the date that the  
10 Commission approved CenturyLink’s communications plans. On June 1, 2017, the  
11 Commission issued Order 06, imposing the suspended penalty due to CenturyLink’s  
12 failure to follow the communications plan.<sup>14</sup> The Commission stated:

13 We remain concerned about CenturyLink’s repeated failures to maintain 911  
14 system integrity and provide sufficient notification of major outages. This is  
15 the third documented instance in the last four years in which a substantial  
16 number of Washington telecommunications customers have been deprived of  
17 access to 911 service for a significant period of time. Our citizens rely on this  
18 service to report emergencies and immediate need of assistance, and the  
19 service’s unavailability has the potential to cause severe harm. At a  
20 minimum, we expect the Company to promptly notify the Commission and  
21 WMD of major outages so that emergency service providers can inform  
22 consumers and take additional steps to mitigate the impact of the outage.  
23 CenturyLink should expect the Commission to continue to monitor the  
24 Company’s performance closely and take whatever action is necessary to  
25 enforce the Company’s 911 obligations.

26 The Commission also addressed the importance of E911 services in Docket UT-  
27 140597, regarding the 6-hour outage of 911 services in April 2014. In that docket,

---

<sup>13</sup> Hawkins-Jones, Exh. JHJ-10, at 19 ¶ 52.

<sup>14</sup> Hawkins-Jones, Exh. JHJ-11, at 3 ¶ 10.

1 the Commission issued Order 03, approving a settlement agreement.<sup>15</sup> As part of the  
2 settlement agreement, CenturyLink accepted a \$2,854,750 penalty. The Commission  
3 stated:

4 [T]he citizens of this state reasonably rely on their ability to access  
5 emergency services by dialing 911. Their inability to do so for even a brief  
6 period of time poses a serious threat to public health, safety, and welfare, not  
7 just a violation of statute and Commission rule”

8 In Docket UT-170042, regarding a CenturyLink acquisition, the Commission issued  
9 Order 03, approving a settlement agreement.<sup>16</sup> As part of that settlement agreement,  
10 the Commission stated that the uninterrupted provision of 911 service in Washington  
11 is of vital importance and that Washington has experienced first-hand some of the  
12 harm that results from even the temporary unavailability of that service.<sup>17</sup>

13

14 **D. Estimated Number of Failed E911 Calls And Revised Penalty**

15 **Recommendation**

16

17 **Q. What is the total number of failed E911 calls during the December 2018 outage?**

18 A. Staff made several attempts to obtain information about the number of failed 911  
19 calls from CenturyLink, however, the Company was evasive in its responses and  
20 Staff was ultimately forced to utilize other methods to determine the number of  
21 emergency calls in Washington state placed to 911 that went unanswered.

---

<sup>15</sup> Hawkins-Jones, Exh. JHJ-12, at 11 ¶¶ 41-42.

<sup>16</sup> Hawkins-Jones, Exh. JHJ-13, at 15 ¶ 58.

<sup>17</sup> See also, Exh. JHJ-14 at 10-11 ¶ 25 (“The Commission thus requires the Company to take all reasonable steps to reduce the foreseeable risks of a 911 outage and to deploy systems that will limit, detect, and immediately remedy whatever service interruptions occur.”).

1 WMD ultimately provided Staff the approximate number of E911 calls  
2 transmitted over the E911 Network from January 2020 through October 2020.<sup>18</sup> Staff  
3 used this E911 call data and averaged the number of calls per 24-hour period, which  
4 was approximately 12,000 completed E911 calls. Because the E911 system failed for  
5 49 hours and 32 minutes, Staff initially estimated that approximately 24,000 E911  
6 calls were affected by the December 2018 outage (using the average data provided  
7 by WMD).

8 Based on the call estimate data, Staff originally recommended a potential  
9 penalty of up to \$7,215,000.

10 Staff obtained additional data after retaining expert telecommunications  
11 consultants to help with this matter. Staff's consultants requested the data concerning  
12 the number of E911 calls by hour band, whether the call was deemed successful or  
13 not, and whether the call was destined for a PSAP managed by CenturyLink or  
14 TSYS. CenturyLink provided that data, and it shows that that during the 49 hour and  
15 32-minute outage, [REDACTED] that were destined for TSYS-served PSAPs had  
16 failed. The data also showed an additional [REDACTED] destined for CenturyLink  
17 PSAPs had failed. This is a total of [REDACTED] calls during the December  
18 2018 outage.<sup>19</sup>

19  
20 **Q. Based on the revised call impact estimate and CenturyLink's failure to notify**  
21 **the Commission of the outage, discussed above, does Staff have a revised**  
22 **penalty recommendation?**

<sup>18</sup> Hawkins-Jones, Exh. JHJ-3C at 4.

<sup>19</sup> Webber, Exh. JDW-1CT at 44:6-15.





1 **Q. Has the Commission listed the factors it analyzes when considering the**  
2 **appropriate penalty for violations of the public service laws or its rules?**

3 A. Yes. The Commission announced its enforcement policy through a policy statement  
4 issued in Docket A-120061.

5  
6 **Q. Are you familiar with that policy statement and the enforcement factors listed**  
7 **in it?**

8 A. Yes.

9  
10 **Q. What factors does the Commission consider for purposes of setting an**  
11 **appropriate penalty?**

12 A. The Commission considers:

- 13 • How serious or harmful the violation is to the public.
- 14 • Whether the violation is intentional.
- 15 • Whether the company self-reported the violation.
- 16 • Whether the company was cooperative and responsive.
- 17 • Whether the company promptly corrected the violations and remedied the  
18 impacts.
- 19 • The number of violations and the number of customers affected.
- 20 • The likelihood of recurrence.
- 21 • The company's past performance regarding compliance, violations, and  
22 penalties.

- 1 • The company's existing compliance program.
- 2 • The size of the company.

3

4 **Q. How serious or harmful were these violations?**

5 A. As noted by Staff witness Mr. Webber, E911 services are a critical link in  
6 Washington's public health and safety systems: Washingtonians call 911 to obtain  
7 emergency help, whether law enforcement, fire suppression, or medical services.<sup>20</sup>  
8 The inability to reach emergency services through E911 is a serious and potentially  
9 fatal event. The risk of death and property loss here was mitigated only by the fact  
10 that no major natural or human-caused disasters or incidents occurred during the  
11 outage.

12

13 **Q. Were these violations intentional?**

14 A. Staff does not believe that any of the violations were intentional. All, however, were  
15 very foreseeable and that should weigh against CenturyLink when setting the  
16 appropriate penalty. As Mr. Webber discusses, [REDACTED]

17 [REDACTED]

18 [REDACTED]

19 [REDACTED]

20 And, as discussed above, CenturyLink's 911 services failed repeatedly in recent  
21 years. Given that, CenturyLink should have been prepared to communicate with the  
22 Commission, but apparently had no procedures in place to do so.

<sup>20</sup> Webber, Exh. JDW-1CT at 5:11-19, 9:1-10:6.

<sup>21</sup> Webber, Exh. JDW-1CT at 7:6-8:4, 24:21-26:14.

1 **Q. Did CenturyLink self-report the violations?**

2 A. Certainly not during the outage. Even at its end, CenturyLink still claimed that it had  
3 not suffered a reportable 911 outage.

4

5 **Q. Did CenturyLink cooperate with Staff's investigation?**

6 A. In some ways. But CenturyLink refused to provide the number of failed calls, and  
7 Staff had to try to reconstruct what had happened from third party sources until  
8 Staff's consultants helped piece together discovery requests that produced the  
9 information used to calculate the number of failed calls.

10

11 **Q. Has CenturyLink corrected the violations and remedied the impacts?**

12 A. CenturyLink worked with its vendors to secure its network, which should prevent  
13 any similar network failures.

14

15 **Q. How many customers did these violations affect?**

16 A. Every Washingtonian was affected by the loss of E911 services. Washingtonians  
17 made [REDACTED] 911 calls that failed during the outage.

18

19 **Q. What is the likelihood of another outage?**

20 A. Hopefully the likelihood of this particular type of outage is low because CenturyLink  
21 has taken steps to prevent the type of packet storm that crippled its network in  
22 December 2018.

23

1 **Q. How does Staff view CenturyLink’s past performance with regard to**  
2 **compliance, violations, and penalties?**

3 A. CenturyLink’s recent performance leaves something to be desired. In 2013,  
4 CenturyLink’s customers in San Juan County lost 911 services for 10 days. In 2015,  
5 the Commission approved a settlement imposing a \$173,210 penalty on CenturyLink  
6 for violations arising that outage. The Commission suspended \$123,210 of that  
7 penalty, but ultimately imposed the suspended amount because CenturyLink failed to  
8 follow all of the terms of the settlement agreement, specifically the communication  
9 plan, with regard to another major outage occurring in 2016.

10 In 2014, CenturyLink’s customers in Klickitat and Skamania Counties  
11 experienced a two-day outage that affected approximately 100,000 customers.  
12 CenturyLink failed to properly notify the Commission of the outage. It agreed to pay  
13 \$2,854,750 in penalties for violations arising from that outage.

14 The Commission has thus repeatedly, significantly, and increasingly  
15 penalized CenturyLink for violations arising from 911 outages over the last decade.

16

17 **Q. Does CenturyLink have a compliance program?**

18 A. Staff does not know of any.

19

20 **Q. Does Staff view CenturyLink as a large company?**

21 A. Yes. CenturyLink reported [REDACTED] in intrastate revenues in 2020.

22

23

1 **Q. Based on your analysis, what factors were most significant to your revised**  
2 **penalty recommendation?**

3 A. Staff based its penalty recommendation largely on two factors: first, the seriousness  
4 of the violations and their potential harm, and second, the fact that CenturyLink  
5 failed to take steps to prevent readily foreseeable violations.

6

7 **Q. Why did Staff focus on those factors?**

8 A. Staff focused on these factors because the mission of the Commission is to protect  
9 the people of Washington by ensuring regulated companies, such as CenturyLink,  
10 provide services that are safe, available, reliable and fairly priced. How can the  
11 Commission fulfill its mission if CenturyLink cannot provide reliable E911 services  
12 to the people of Washington? This outage was preventable [REDACTED]

13 [REDACTED]

14 [REDACTED]

15

16 **Q. Does Staff's investigation report set forth a more complete penalty analysis?**

17 A. Yes. The Commissioners may review it if they have any questions about Staff's  
18 analysis of the appropriate penalty.

---

<sup>22</sup> Webber, Exh. JDW-1CT at 7:6-8:4.

1           **E.     Follow-up PSAP Communication**

2

3   **Q.     Did Staff perform any follow up communication with the PSAPs CenturyLink**  
4           **still managed during the December 2018 outage?**

5   A.     Yes. Staff reached out to seven of the 15 PSAPs CenturyLink identified it managed  
6           during the December 2018 outage. Staff provided each PSAP with an identical list of  
7           questions. To date, Staff received responses from five of the PSAPs. Staff is still  
8           waiting on a response from one PSAP and one PSAP is unable to provide responses  
9           presently due to staffing issues.

10                   In the five responses that Staff received, four PSAPs (ValleyCOM,  
11           NORCOM, South Sound 911 – Puyallup, and Colville Tribal Police) experienced a  
12           disruption during the outage timeframe.<sup>23</sup> Types of service disruptions included:

- 13           •     Unable to call other PSAPs managed by CenturyLink
- 14           •     Fast busy signal when trying to call 911 during outage times
- 15           •     Unable to transfer 911 calls to other PSAPs managed by CenturyLink
- 16           •     Unable to return calls to some 911 customer hang-ups or receive all 911 texts
- 17           •     Unable to make long distance calls – including calls to CenturyLink E911  
18           repair.

19           Colville Tribal Police Department stated its calls are relayed through the counties  
20           and because of the outage the PSAP had to distribute cell phones to dispatchers to  
21           receive those emergency calls.

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<sup>23</sup> Hawkins-Jones, Exh. JHJ-15.  
TESTIMONY OF JACQUE HAWKINS-JONES  
Docket UT-181051

1                    Additionally, the same four PSAPs did not receive any outage notification  
2                    from CenturyLink, as required by WAC 480-120-412(2). One PSAP (ValleyCOM)  
3                    stated that the only notification shared from CenturyLink was through “trouble  
4                    tickets” and the information that was shared was very limited.

5                    The one remaining PSAP (Spokane Regional Emergency Communications)  
6                    stated it was not impacted by the outage. However, the PSAP could only provide a  
7                    Facebook posting from December 2018 that confirmed the PSAP was not affected  
8                    because it no longer had access to its previous internal system.<sup>24</sup>

9

10    **Q.    Does this conclude your testimony?**

11    A.    Yes.

12