

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

**WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,**

Complainant,

v.

**CENTURYLINK COMMUNICATIONS
LCC d/b/a LUMEN TECHNOLOGIES
GROUP; QWEST CORPORATION;
CENTURYTEL OF WASHINGTON,
INC.; CENTURYTEL OF INTER
ISLAND, INC.; CENTURYTEL OF
COWICHE, INC.; UNITED
TELEPHONE COMPANY OF THE
NORTHWEST,**

Respondents.

DOCKET UT-210902

CROSS-EXAMINATION EXHIBIT OF

COREY J. DAHL

**ON BEHALF OF
CENTURYLINK**

March 14, 2023

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

Docket UT-210902

Washington Utilities & Transportation Commission v. CenturyLink Communications, LLC

**RESPONSE OF PUBLIC COUNSEL TO CENTURYLINK
DATA REQUEST NO. 2**

Request No: 2
Directed to: Public Counsel
Date Received: March 1, 2023
Date Produced: March 8, 2023
Prepared by: Corey Dahl
Witnesses: Corey Dahl

CENTURYLINK DATA REQUEST NO. 002:

RE: Exh. CJD-3T at 11:8-10

In reference to future public health, public safety, or economic crises as referenced in Exh. CJD-3T at 11:8-10, please provide an example of an appropriate compliance plan that Public Counsel would support.

PUBLIC COUNSEL'S RESPONSE:

It is not Public Counsel's obligation to create a compliance plan for the company. Creating a compliance plan is the Company's responsibility. The issue in this case is that CenturyLink had no compliance plan in place to address a situation where its operations were impacted by an external event. Additionally, the company had no plan in place to adequately address differing regulations across its service territory.

To: Donna L. Barnett, CenturyLink Communications, LLC
Re: Docket UT-210902 Public Counsel Responses to CenturyLink DR Nos. 1 – 6
Date: March 8, 2023
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