

**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. 5**

Request No: 5
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. 005:

RE: Exh. CJD-3T at 11

Does Mr. Dahl or Public Counsel contend that a violation is “likely to recur” merely because it could possibly recur? If your answer is other than no, please fully explain.

PUBLIC COUNSEL’S RESPONSE:

The Company’s compliance history and lack of compliance plan suggests that a future violation is probable. Furthermore, the Company’s only solution to future compliance is to reinstate the processes in place during the COVID-19 disconnection moratorium and those processes were not adequate to establish compliance.

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