

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION STAFF  
RESPONSES TO DATA REQUESTS

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

WITNESS: James Webber  
RESPONDER: James Webber  
TELEPHONE: (312) 952-6694

**REQUEST NO. 19:**

At page 7 (among others) of his Direct Testimony, Mr. Webber references an Infinera document stating that it intended to “scrub all CenturyLink networks to validate IGCC settings and determine if action needs to be taken.” Please fully describe your understanding of what Infinera did to “scrub” the network, including the factors Infinera used to determine the action, if any, that needed to be taken.

**CONFIDENTIAL RESPONSE TO REQUEST NO. 19:** 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 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:

Staff’s understanding of Infinera’s actions is based on CenturyLink’s response to Staff Data Request 24, in which CenturyLink stated “CLC is not in a position to represent all steps taken by Infinera to [REDACTED]”

See also Webber, Exh. JDW-5C; Webber, Exh. JDW-6C at 15-16.