

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION STAFF
RESPONSES TO DATA REQUESTS

DATE PREPARED: September 22, 2022

WITNESS: Commission Staff

DOCKET: UT-181051

RESPONDER: Commission Staff

REQUESTER: CenturyLink

CENTURYLINK DATA REQUEST NO. 29:

Is Staff (including Mr. Akl) aware of any FCC or industry guidance dating prior to the December 2018 outage that specifically suggested the need to lock an unused IGCC or comparable communications channel? If your answer is other than no, identify and produce all such standards/guidance.

RESPONSE:

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) not in Staff's possession, custody, or control; (b) already in the Company's possession, custody, or control; (c) publicly available; and/or (d) obtainable from some other source that is more convenient, less burdensome, or less expensive. Staff further objects to this request to the extent it requests more than is required by the Commission's rules and orders. Staff further objects to the data request to the extent that the Company is asserting/assuming the existence of facts. Staff further objects to this request to the extent it seeks speculative and/or hypothetical information.

Without waving the above objections, Staff responds as follows:

See Witness Webber's December 15, 2021 prefiled Testimony (Exh. JDW-1CT) at page 32, lines 1-18. As Witness Webber explained, the FCC cited to two specific CSRIC best practices as industry guidance when it faulted CenturyLink for "[l]eaving the [IGCC] channel enabled [which] created a vulnerability in the network." *See also*, Webber, Exh. JDW-4 at 15 n. 40 (citing CSRIC Best Practices 11-6-5170 and 11-8-8000) and Webber, Exh. JDW 15 (citing CSRIC Best Practices 9-6-5170 and 9-8-8000).