

**BEFORE THE WASHINGTON  
UTILITIES AND TRANSPORTATION COMMISSION**

**Docket UT-181051**

*Washington Utilities & Transportation Commission v. CenturyLink Communications, LLC*

**RESPONSE OF PUBLIC COUNSEL TO CENTURYLINK  
DATA REQUEST NO. 34**

Request No: 34  
Directed to: Public Counsel  
Date Received: September 23, 2022  
Date Produced: October 7, 2022  
Prepared by: Brian Rosen  
Witnesses: Brian Rosen

**DATA REQUEST NO. 34.**

At page 11 (lines 7-11) of his Cross-Answering Testimony, Mr. Rosen asserts that “we really don’t know” if the Infinera green network failure caused failures on other CenturyLink transport networks. Is Mr. Rosen aware of any CenturyLink networks other than the Infinera green network that experienced software problems, hardware problems or failed calls during the December 2018 green network outage? If your answer is other than no, fully explain your response and produce all documents supporting your response.

**RESPONSE:**

The text on page 11 refers to CenturyLink’s assertion that the failure on the Red network could not have occurred on the Green network. Mr. Rosen is not aware of any CenturyLink networks other than the Infinera Green network that experienced software problems, hardware problems or failed calls during the December 2018 Green network outage.