

REQUEST NO. 3:

Produce all written communications between Staff and the Washington Military Department (“WMD”) regarding the Docket.

RESPONSE:

Objection: Staff objects to this request as overbroad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence, and cumulative of information within CenturyLink’s possession, custody, control or personal knowledge. Subject to and without waiving the above objections, Staff provides the following response:

Please find attached written communication between Staff and WMD – attached as **DR 3 Attachment A (Confidential)**.

SUPPLEMENTAL RESPONSE NO. 3:

None. All responsive documents were provided on March 24, 2021.

7/23/2021 Supplemental Response:

Objection: Staff objects to providing or identifying communications regarding the Docket between WMD and the Commission Staff on or after January 14, 2021, as attorney-client privileged communications and protected workproduct pursuant to a common interest agreement. As CenturyLink is aware, the parties to this Docket have exchanged data request responses and email communications, including attachments. Those communications involved all parties and will not be duplicated here.

Subject to and without waiving the objections above, Staff provides the following response:

After further review, Staff has determined that there were additional communications between Staff and WMD that should have been disclosed in response to the above data request – Those communications are attached hereto as **DR 3 Attachment B**.

**Attachment A to DR 3
is redacted in its entirety.**

From: [Fukano, Harry \(UTC\)](#)
To: [Cortez, Dawn C. \(ATG\)](#)
Cc: [Brown, Sally \(UTC\)](#)
Subject: RE: UT 181051
Date: Thursday, January 14, 2021 8:14:44 AM

Hello Dawn,

Certainly, the best number to reach me would be 3609952818.

Thank you,

Harry

Sent from [Workspace ONE Boxer](#)

On January 13, 2021 at 5:09:56 PM PST, Cortez, Dawn C. (ATG) <dawn.cortez@atg.wa.gov> wrote:

This message has originated from an External Source. Please use caution when opening attachments, clicking links, or responding to this email. Contact your desktop support or IT security staff for assistance and to report suspicious messages.

Hi Harry,

Thanks, can I give you a call tomorrow?

Dawn

From: Fukano, Harry (UTC) <harry.fukano@utc.wa.gov>
Sent: Wednesday, January 13, 2021 4:25 PM
To: Cortez, Dawn C. (ATG) <dawn.cortez@atg.wa.gov>
Cc: Brown, Sally (UTC) <sally.brown@utc.wa.gov>
Subject: UT 181051

[EXTERNAL]

Hello Dawn,

I am Harry Fukano, an AAG in the Utilities and Transportation Division. I had heard that you had reached out regarding the Commission Staff investigation into the Dec. 2018 911 outage in Docket 181051. I wanted to let you know that Sally Brown and I will be representing Staff in the case and to see if you had any questions about the case.

Thank you,

Harry Fukano
Assistant Attorney General

Utilities and Transportation Division
Office of the Attorney General
360-664-1225
Harry.fukano@utc.wa.gov