CENTURYLINK

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Lisa A. Anderl

Senior Associate General Counsel

Regulatory Law

Century Link®

January 20, 2016

Via Web Portal and Overnight Delivery

Mr. Steven V. King **Executive Director and Secretary** Washington Utilities & Transportation Commission 1300 S. Evergreen Park Drive SW P.O. Box 47250 Olympia, WA 98504-7250

Re: Docket UT-132234, Order 03, Compliance Filing

ket UT-132234, Order 03, Compliance Filing
San Juan County Communications Plan; Statewide
Communications Plan; and Register of All Meetings, Calls and
Other Ancillary Steps Taken

Dear Mr. King,

In compliance with the terms of the Revised Settlement Agreement between CenturyLink, Staff and Public Counsel, approved by the Commission in its Order 03 in the above-referenced docket, CenturyLink includes in this filing an original and five (5) copies of the San Juan County Communications Plan; Statewide Communications Plan; and Register of All Meetings, Calls and Other Ancillary Steps Taken.

If you have any questions regarding the enclosed, please don't hesitate to call me.

Sincerely,

Lisa A. Anderl

LAA/jga Enclosure

Service List cc:

Hard Copy

CERTIFICATE OF SERVICE Docket No. UT-132234

Washington Utilities and Transportation Commission v. CenturyTel of Inter Island, Inc. d/b/a CenturyLink

I certify that I have served or caused to be served copies the CenturyLink's Order 03, Compliance Filing - San Juan County Communications Plan; Statewide Communications Plan; and Register of All Meetings, Calls and Other Ancillary Steps Taken on the following parties:

Lisa Gafken Office of the Attorney General 800 Fifth Avenue, Suite 2000

Seattle, WA 98104-3188

Email: <u>lisa.gafken@atg.wa.gov</u>

Via email and UPS delivery

Via email and UPS delivery

Jennifer Cameron-Rulkowski Assistant Attorney General 1400 S Evergreen Park Dr SW P.O. Box 40128 Olympia, WA 98504-0128 Email: jcameron@utc.wa.gov

Marguerite E. Friedlander, ALJ, mfriedla@utc.wa.gov

Via email

Stefanie Johnson, stefaniej@atg.wa.gov

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Via email

Krista Gross, kgross@utc.wa.gov

Via email

Betsy DeMarco, bdemarco@utc.wa.gov

Via email

DATED this 20th day of January 2016.

Jose Addington

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,

Complainant,

v.

CENTURYTEL OF INTER ISLAND, INC. D/B/A CENTURYLINK.

Respondent.

DOCKET UT-132234

FILING IN COMPLIANCE WITH ORDER NO. 03; SAN JUAN COUNTY COMMUNICATIONS PLAN; STATEWIDE COMMUNICATIONS PLAN; AND REGISTER OF ALL MEETINGS, CALLS, AND OTHER ANCILLARY STEPS TAKEN

RECORDS MANAGEMENT
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2016 JAN 21 AN 11: 25
UTR. AND TRANS

BACKGROUND

- CenturyTel of Inter Island, Inc. d/b/a CenturyLink ("CenturyLink") provides telecommunications services including, but not limited to, basic local exchange service to the public in San Juan County in the state of Washington.
- On November 5, 2013, CenturyLink customers in San Juan County experienced a loss of toll calls, data communications, and local calls due to a break in an underwater fiber cable connecting Lopez Island with the main switch on San Juan Island.
- On November 5, 2014, the regulatory staff ("Staff") of the Washington Utilities and Transportation Commission ("Commission") filed a complaint against CenturyLink. The complaint alleged a number of violations of WAC 480-120-412, the Commission rule related to major outages, and recommended the Commission assess a penalty of up to \$173,210.

FILING IN COMPLIANCE WITH ORDER NO. 03; SAN JUAN COUNTY COMMUNICATIONS PLAN; STATEWIDE COMMUNICATIONS PLAN; AND REGISTER OF ALL MEETINGS, CALLS, AND OTHER ANCILLARY STEPS TAKEN

CenturyLink 1600 7th Ave., Suite 1506 Seattle, WA 98191 Telephone: (206) 398-2500

- On June 2, 2015, CenturyLink, Staff, and the Public Counsel Section of the Washington Office of the Attorney General ("Public Counsel") filed a full Settlement Agreement. On June 26, 2015, the parties filed a revised Settlement Agreement ("Settlement") and supporting Joint Testimony.
- 5 The Settlement provides for, among other things:
 - the development of a San Juan County Emergency Communication Plan;
 - the development of a Washington State Emergency Communications Plan, in collaboration with Staff and Public Counsel
- In Order No 03, entitled "FINAL ORDER ACCEPTING AND ADOPTING
 SETTLEMENT AGREEMENT WITH CONDITIONS," in WUTC Docket UT-132234,
 the Commission accepted and adopted the Settlement with three conditions, two of which
 are pertinent here:
 - 1) CenturyLink shall extend an invitation to the Washington Military Department to participate in the drafting of the Washington State Emergency Communications Plan;
 - 2) The parties shall file the San Juan County Emergency Communications Plan and the Washington State Emergency Communications Plan within three months of the effective date of this Order, in accordance with paragraph 30 below, as well as a reasonably detailed register of all meetings, calls, and other ancillary steps taken to develop such plans.
- 7 Order No. 3 explains the Settlement's provisions regarding the Communications Plans as follows:

[T]he Settlement establishes a framework for development and implementation of two Emergency Communications Plans, one to address San Juan County and the other to address the entire state. For the San Juan County emergency communications plan, the Company commits to meet with Staff and Public Counsel, as well as any representatives of the County DEM and the Washington Military Department that wish to attend, to formulate an emergency communications plan for San Juan County that is responsive to the requirements in WAC 480-120-412. The Settlement provides for one meeting to take place in

FILING IN COMPLIANCE WITH ORDER NO. 03; SAN JUAN COUNTY COMMUNICATIONS PLAN; STATEWIDE COMMUNICATIONS PLAN; AND REGISTER OF ALL MEETINGS, CALLS, AND OTHER ANCILLARY STEPS TAKEN

CenturyLink 1600 7th Ave., Suite 1506 Seattle, WA 98191 Telephone: (206) 398-2500 San Juan County within six months of this Order's effective date, with Staff initiating, coordinating, and facilitating the meetings.

. . .

Similarly, CenturyLink commits to working with Staff and Public Counsel to develop a statewide emergency communications plan to address any future Washington outages consistent with WAC 480-120-412. The Settlement provides for one meeting to take place at the Commission's headquarters in Olympia within six months of this Order's effective date, with Staff initiating, coordinating, and facilitating the meetings.

DEVELOPMENT OF THE PLANS

MEETINGS

- In accordance with Order No. 3, Staff initiated, coordinated, and facilitated a meeting in Friday Harbor in San Juan County on December 9, 2015 that was attended by, among others, representatives of Staff, Public Counsel, the Project and Operations Manager of the E911 Unit of the Emergency Management Division of the Washington Military Department ("E911 Unit manager"), the Director of San Juan County/Town of Friday Harbor Department of Emergency Management ("San Juan EM Director"), the San Juan County E911 County Coordinator, and CenturyLink ("Friday Harbor meeting").
- 9 Staff also initiated, coordinated, and facilitated a meeting at the Commission's headquarters in Olympia on December 15, 2015 that was attended by representatives of Staff, Public Counsel, the E911 Unit Manager and CenturyLink ("Olympia meeting").

THE ISSUE OF THE NAME OF THE PLANS

At the Friday Harbor meeting the San Juan EM Director explained that an emergency communications plan was the purview of an emergency management department or division. A local telephone company such as CenturyLink would more properly have an "outage notification" or communications plan because the plan contains procedures to

FILING IN COMPLIANCE WITH ORDER NO. 03; SAN JUAN COUNTY COMMUNICATIONS PLAN; STATEWIDE COMMUNICATIONS PLAN; AND REGISTER OF ALL MEETINGS, CALLS, AND OTHER ANCILLARY STEPS TAKEN

CenturyLink 1600 7th Ave., Suite 1506 Seattle, WA 98191 Telephone: (206) 398-2500 disseminate information to the public, public officials, and news media during an outage (which may or may not constitute an emergency). At the Olympia meeting the E911 Unit manager reiterated this point. Consequently, the parties agreed that the title of both communications plans should use the word "Outage" rather than "Emergency." The use of "outage" instead of "emergency" in the plans' titles also comports with WAC 480-120-412, which consistently refers to major outages, not emergencies.

THE PLANS

- The parties also concluded that any procedures established in a statewide outage communications plan should also apply to San Juan County and that, therefore, the outage communications plan for San Juan County should consist of the statewide outage communications plan with procedures for disseminating information that are unique to San Juan County appended to it.
- The Settlement calls for creation of a statewide outage communications plan to be followed by all subsidiaries of CenturyLink that provide basic local exchange service in Washington, not just CenturyTel of Inter Island. Accordingly, the statewide outage communications plan applies to major outages of telephone service in Washington provided by CenturyTel of Inter Island, Inc., CenturyTel of Cowiche, Inc., CenturyTel of Washington, Inc., and Qwest Corporation. CenturyTel of Inter Island is the only CenturyLink subsidiary that provides local exchange service in San Juan County. Thus, the San Juan County outage communications plan applies to CenturyTel of Inter Island, Inc., only.

COMPLIANCE ATTACHMENTS

13 In compliance with Order No. 03, attached to this compliance filing are the following:

Attachment A - Statewide Outage Communications Plan;

Attachment B - San Juan County Outage Communications Plan;

Attachment C - Register of all meetings, calls, and other ancillary steps taken.

Respectfully submitted this <u>20th</u> day of January 2016.

CENTURYLINK

Lisa A. Anderl (WSBA # 13236)

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ATTACHMENT A

Washington State Outage Communications Plan of CenturyLink

INTRODUCTION

In accordance with the approved Settlement in the case, CenturyLink met with representatives from Commission Staff and Public Counsel to develop an emergency communications plan for use during major outages in Washington State consistent with the requirements of WAC 480-120-412.

WAC 480-120-412 regulates the actions of companies subject to the Commission's jurisdiction during Major Outages as that term is defined in WAC 480-120-021.

This document serves as CenturyLink's statewide communications plan for use by CenturyLink personnel during major outages in Washington ("Statewide Outage Communications Plan" or "SOCP"). The SOCP also provides the Commission, emergency management officials and the public an understanding of the communications to expect from CenturyLink in the event of a major outage of telephone service. The procedures set forth in the SOCP are intended to explain CenturyLink's communications procedures but are not intended to limit CenturyLink's ability or prerogative to communicate with the Commission, emergency management officials and/or the public in other ways and at other times not specified in the SOCP. These procedures are in addition to standard outage reporting procedures involving the Washington State Military Department.

GOAL/OBJECTIVE

The goal of the SOCP is for CenturyLink to make information about a major outage of telephone service in Washington available to the people who need to know that is as timely and accurate as reasonably possible so that they can plan for and adapt to the effects of the outage.

DEFINITIONS

"Communicator" is an organization within CenturyLink that is tasked with communicating pertinent information about a major outage to one or more target audiences. This SOCP identifies the following CenturyLink organizations as communicators:

1. Community Relations & External Communications resides in CenturyLink's Brand Management, Corporate Communications & Investor Relations organization and is responsible for external communications through conventional and social media.

2. **Network Events Management Center (NEMC)** resides in CenturyLink's Public Safety Services and NEMC organization and serves all states where CenturyLink provides telephone service.

The NEMC e-mails the Washington Utilities and Transportation Commission, the E911 Unit of the Emergency Management Division of the Washington Military Department **PUC reports** of major outages that contain the following pertinent information, as and when available:

Report Number Impacted Company Date and Time Time Zone For Questions Contact Reason for Outage Notification Cause of Outage Location of Outage Exchange Name / Wire Center **Expected Duration** Actual Duration Number of Customers/ Cable pair impacted Services Affected Agencies Notified Significant Update Resolution Restore Date/Time

3. **9-1-1 Network and Center Operations** residing in CenturyLink's Public Safety Services (PSS) organization. The 9-1-1- Network and Center Operations is responsible for, among other things, telephone service outage notifications to the E911 Unit of the Emergency Management Division of the Washington Military Department and Public Service Access Points (PSAPS) in all states where CenturyLink provides telephone service.

"Major outage" has the same definition as in WAC 480-120-021, which is:

- 1. A service failure lasting for thirty or more minutes that causes the disruption of local exchange or toll services to more than one thousand customers;
- 2. Total loss of service to a public safety answering point or emergency response agency;

- 3. Intercompany trunks or toll trunks not meeting service requirements for four hours or more and affecting service; or
- 4. An intermodal link blockage (no dial tone) in excess of five percent for more than one hour in any switch or remote switch.

"Target audience" is an organization or group of people that is interested in, affected by or has a need to know about a major outage. This SOCP defines the following target audiences:

- 1. The Washington Utilities and Transportation Commission;
- 2. E911 Unit of the Emergency Management Division of the Washington Military Department;
- 3. Public Service Access Points (PSAPs);
- 4. The general public, including CenturyLink telephone service customers who are out of service.

COMMUNICATIONS PROCEDURES BY TARGET AUDIENCE

1. Washington Utilities and Transportation Commission.

CenturyLink communicates available pertinent information about major outages to the WUTC by e-mail distribution of PUC Reports issued by the NEMC. The NEMC updates the reports frequently until the outage is resolved.

2. E911 Unit of the Emergency Management Division of the Washington Military Department.

CenturyLink communicates available pertinent information about major outages to the E911 Unit by e-mail distribution of PUC Reports issued by the NEMC. The NEMC updates the reports frequently until the outage is resolved.

3. Public Service Access Points (PSAPs).

In compliance with federal regulations, CenturyLink communicates available pertinent telephone service outage information to potentially affected PSAPs by e-mail notification and, when possible, contact by telephone.

Although communication with PSAPS is governed by federal regulations that establish protocols and requirements for outage notification to PSAPs nationwide, CenturyLink will modify its outage notification system so that it provides e-mail notification to PSAPs of major outages as defined in WAC 480-120-021. The system will identify major

outages by Common Language Location Identifier (CLLI) code¹ and notify all PSAPs served in that CLLI of a major outage in the CLLI. CenturyLink anticipates completing the modification by June 30, 2016.

4. The general public including CenturyLink telephone service customers who are out of service.

CenturyLink communicates information about prolonged and widespread telephone service outages to the public through use of conventional media, social media and monitor media targeted to affected communities. Examples of the targeted communications are provided in Appendix A.

Conventional media outlets can include:

- Radio stations
- Television stations
- Newspapers
- Local Media (blogs, etc)

Social Media outlets can include:

- Facebook (geo-targeted to the state)
- Twitter (geo-targeted to the state)

CenturyLink communicates information to its customers about prolonged and widespread telephone service outages through conventional media and social media. In addition CenturyLink maintains a website called "Service Troubleshooter" that provides residential telephone service customers information about their particular telephone service. Customers who access the website and input their account or billing telephone number and ZIP code can find out if their telephone service is out and if a repair ticket for the service is open. They may also opt into a notification by their choice of text, e-mail or telephone call to a telephone number of their choosing when service is restored.

In the event of a prolonged major outage, defined as a Major Outage lasting more than 72 hours, CenturyLink can establish a special website that provides information about the outage to its customers and the public. Known as a Dark Site, this website is able to provide:

¹ CLLI is a standardized way of describing locations and significant pieces of hardware at those locations. The short eight-character CLLI is broken down as follows: The first four describe the city; the next two are the state, the last two are a specific office in that city and state.

- Any available facts about what happened as part of an opening or initial statement describing the crisis event and the organization's response.
- Any relevant special instructions regarding the outage.
- What steps are being taken to get the situation back to normal.
- Relevant background information describing the organization, the causes, nature and likely impact of the crisis; in short, anything that promotes clear understanding of the situation.
- Contact information for the news media.

In addition to the foregoing, CenturyLink may communicate with communities of interest as conditions warrant through other means, including, but not limited to, e-mail updates, conference calls, or in person meetings with government officials and members of the community. These ad hoc communications occur as and when CenturyLink determines unique circumstances call for additional communication about an outage.

Appendix A

Communications to the public through traditional, social and monitor media

Key Messages

This appendix contains key messages which are the pertinent information that is important to communicate to target audiences. Key messages are the broad overall messages that can be tailored to a specific event.

Communications Timing

Corporate Communications distributes notifications and updates on the specific outage situation to media described in the media distribution below.

The frequency of communications will vary depending on the severity of the outage, but should be delivered at least once every 24 hours throughout the event.

Unplanned Outage

Media Distribution

- **Traditional Media** updates provided to media in impacted markets and on a reactive basis to other media outlets.
- Social Media updates posted to Facebook and Twitter (Geo targeting impacted areas).
- Monitor Media leverage Hootsuite and #hashtag where applicable.

Traditional media messaging

"CenturyLink technicians continue to work around the clock in (STATE or REGION) to repair residential and business services impacted by (TYPE of OUTAGE – If known)". (For weather-related outages, provide situational information including generator use, locations with restored service, locations hardest hit, ETR – if known, phone numbers to call to report outages or to activate Emergency Call Forwarding.) We apologize for any inconvenience this has created for our customers."

Facebook post

"CenturyLink technicians continue to work around the clock in (STATE or REGION) to repair residential and business services impacted by (TYPE of OUTAGE – If known). We apologize for any inconvenience this has created for our customers." (For weather-related outages, provide situational information including generator use, locations with restored service, locations hardest hit, ETR – if known, phone numbers to call to report outages or to activate Emergency Call Forwarding.)

Twitter post

"CenturyLink technicians continue to work around the clock in (STATE or REGION) to repair services impacted by (TYPE of OUTAGE – If known)." Additional posts for weather-related outages could also include: (Situational information including generator use, locations with restored service, locations hardest hit, ETR – if known, phone numbers to call to report outages or to activate Emergency Call Forwarding.)

Calls to Actions can include

- Advising customers to call the number on their bill and select the "repair" prompt during the automated options. Website for customer inquiry in the case of an outage to be notified by text, email, phone for updates
- Local Emergency Management in the case of 911 impacted (Fire/Police)

Unplanned Post-Event Reactive Response (resolution messaging)

Media Distribution

- Traditional Media updates provided to media in impacted markets and on a reactive basis to other media outlets
- Social Media updates posted to Facebook and Twitter (Geo targeting impacted areas)
- Monitor Media- leverage hootsuite and #hashtag where applicable

Traditional Media Messaging

"Due to a (fiber cut/equipment malfunction) on (DATE), CenturyLink customers in (STATE or REGION) may have experienced disruptions to their services. CenturyLink technicians worked quickly to identify and restore impacted services. All services were restored on/by (TIME/DATE). CenturyLink is committed to providing reliable services to its customers and we apologize for any inconvenience this may have caused our customers."

Facebook post

"Due to a (fiber cut/equipment malfunction) on (DATE), CenturyLink customers in (STATE or REGION) may have experienced disruptions to their services. CenturyLink technicians worked quickly to identify and restore impacted services. All services were restored on/by (TIME/DATE). We apologize for any inconvenience this may have caused our customers."

Twitter post:

"CenturyLink has restored services in (STATE or REGION) due to a (REASON). We apologize to customers for the inconvenience."

ATTACHMENT B

San Juan County Outage Communications Plan of CenturyLink

INTRODUCTION

This document serves as CenturyLink's communications plan for use by CenturyLink personnel during certain outages in San Juan County ("San Juan County Outage Communications Plan" or "SJCOCP"). The SJCOCP also provides the Commission, San Juan County emergency management officials and the public an understanding of the communications to expect from CenturyLink in the event of a covered outage of telephone service in San Juan County. The procedures set forth in the SJCOCP are intended to explain CenturyLink's communications procedures but are not intended to limit CenturyLink's ability or prerogative to communicate with the Commission, emergency management officials and/or the public in other ways and at other times not specified in the SJCOCP.

GOAL/OBJECTIVE

The goal of the SJCOCP is for CenturyLink to make information about a major outage of telephone service in San Juan County available to the people who need to know that is as timely and accurate as reasonably possible so that they can plan for and adapt to the effects of the outage.

INCORPORATION BY REFERENCE

The parties involved in helping CenturyLink develop the SJCOCP concluded that any procedures established in a statewide outage communications plan should also apply to San Juan County and that, therefore, the outage communications plan for San Juan County should consist of the statewide outage communications plan with procedures for disseminating information that are unique to San Juan County appended to it. Accordingly, this SJCOCP incorporates by reference CenturyLink's statewide outage communications plan that is Attachment A to this compliance filing.

SAN JUAN COUNTY

San Juan County's nearly 16,000 residents (as of 2015) live on a collection of 32 inhabited islands, with no road connections to the mainland or between islands. The Washington State Ferries operated by the Washington State Department of Transportation (WSF) transport passengers and vehicles to and among the four most populous islands: San Juan, Orcas, Lopez

and Shaw. Large equipment or goods that are forbidden on WSF are moved by one of three barges serving the entire county.

CenturyTel of Inter Island d/b/a CenturyLink (Inter Island) provides wireline voice service in San Juan County. In 2013, the failure of a submarine cable providing Inter Island's only connection to the mainland resulted in an outage that left Inter Island's subscribers unable to connect to the mainland by wireline phone for ten days. Since that outage, Inter Island has repaired the submarine cable and has installed a microwave radio that provides a redundant connection to the mainland and that greatly reduces the chances Inter Island voice customers will be isolated from the mainland.

Almost everywhere in Washington where CenturyLink is the Incumbent Local Exchange Carrier (ILEC), CenturyLink serves less than 25% of the homes and businesses it passes. San Juan County is an exception. Inter Island is the only ILEC in San Juan County and, as of the end of 2013, it served more than 12,000 access lines in San Juan County, which constitutes a service penetration rate much higher than 25%. In the five years since 2009, ILEC access line counts statewide declined 34%; in San Juan County, they declined only 8%. This data suggests San Juan County depends far more on Inter Island's ILEC voice service than Washingtonians as a whole depend on ILEC service.

COMMUNICATIONS PROCEDURES UNIQUE TO SAN JUAN COUNTY

Because of the unique nature of San Juan County and its high dependence on Inter Island, CenturyLink's communications procedures include the following in addition to the procedures set forth in CenturyLink's Statewide Outage Communications Plan.

- 1. CenturyLink will make a reasonable effort to personally notify the E911 Dispatcher on duty at the San Juan County Sheriff's Office of any major outage and any other single outage affecting more than 250 voice grade equivalents (VGE). The employee will provide the E911 Dispatcher a copy of an Outage Status that appears as Appendix A to this SJCOCP.¹
- 2. If the duration of a major outage exceeds 4 hours or the duration of a single outage of more than 250 VGE exceeds 12 hours, CenturyLink will use the "outage@sanjuandem.net" email address to notify key local personnel and decision

CenturyLink will endeavor to provide prompt and accurate notice. In some circumstances—the middle of the night for example—notice may be by telephone. In instances of multiple outages—caused by, for instance, strong winds, heavy rain, or earthquake—CenturyLink will provide a single notice that it is experiencing multiple outages. The data shown in Appendix A will be delivered as soon as reasonably possible within 24 hours.

makers by email and include in the email a copy of an Outage Status that appears as Appendix A to this SJCOCP. If CenturyLink determines that email communication with the San Juan County Emergency Management Director (SJCEMD) was unsuccessful (such as notification of e-mail delivery failure), the employee will attempt to contact the SJCEMD by telephone. If telephone communication with the SJCEMD is unsuccessful, the employee will make a reasonable attempt, under the circumstances, to contact the SJCEMD in person.

- 3. A CenturyLink employee will make a reasonable attempt to provide the E911 Dispatcher and SJCEMD updates concerning the outage twice daily at the beginning and ending of each day until service is restored and notice when service is restored.
- 4. In the case of a single outage affecting more than 500 VGE with a duration exceeding 48 hours, CenturyLink will make a reasonable attempt to cause to be posted a written notice about the outage at a conspicuous location on all of the four WSF-served islands affected by the outage. The notice will include pertinent information such as that found on the outage notice and status appearing in Appendix A of this SJCOCP. The location for posting the notice on each island is set forth in Appendix B of this SJCOCP. The CenturyLink network operations supervisor for San Juan County will consult annually in December with the SJCEMD about the need to change the posting location of the notices and will update Appendix B to this SJCOCP before February 1 of each year.
- 5. For major outages lasting (or expected to last) more than 48 hours and for smaller outages as recommended by the SCJEMD:
 - a. CenturyLink will make a reasonable attempt to cause to be posted a written notice about the outage at a conspicuous location on all of the four WSF-served islands affected by the outage. The notice will include pertinent information such as that found on the outage notice and status appearing in Appendix A of this SJCOCP. The location for posting the notice on each island is set forth in Appendix B of this SJCOCP. The CenturyLink network operations supervisor for San Juan County will consult annually in December with the SJCEMD about the need to change the posting location of the notices and will update Appendix B to this SJCOCP before February 1 of each year.
 - b. CenturyLink will host daily conference calls. The invitation list for these calls is set forth in Appendix C to this SJCOCP. The CenturyLink network operations supervisor for San Juan County will consult annually in December with the SJCEMD about who should be added to and removed from the invitation list and will update Appendix C to this SJCOCP before February 1 of each year.

- c. CenturyLink will update local media directly of outage using the CenturyLink Corporate Communication maintained distribution list, and provide updates at a minimum of every 12 hours.
- **6.** For major outages lasting (or expected to last) more than 72 hours:
 - a. CenturyLink will establish a website providing available information about the outage that that CenturyLink reasonably believes to be accurate. Information on the website will be updated at least every 12 hours. CenturyLink will notify local media of the website.
 - b. CenturyLink will establish a local telephone number with recorded information about the outage. Information on the recording will be updated a least every 12 hours. CenturyLink will notify local media of the recording.
 - c. CenturyLink will hold community meetings on all of the four major island(s) experiencing the outage. The SJCEMD may recommend emergency services organizations that could host such community meetings and effective means of notifying the public of the meetings.

Appendix A

CENTURYLINK				
OUTAGE NOTIFICATION AND STATUS				
	1 ST Notification	Date:	Time:	
	Update	Date:	Time:	
1.	Type of Service Impacted	 □ E911 □ Voice Toll □ Voice Long Distance □ Voice Local □ Internet 		
2.	Island Impacted	☐ San Juan ☐ Orcas ☐ Lopez ☐ Other		
3.	Number of Customers Affected			
4.	Location of Outage			
5.	Cause of Outage			
6.	Estimated Time to Repair			
7.	Additional Information			

Appendix B

Locations for posting notices of telephone service outages in San Juan County

Outage on	Posting Location
San Juan Island	King's Market, 160 Spring St. W, Friday Harbor
Orcas Island	Island Market, 469 Market St., Eastsound
Lopez Island	Lopez Village Market, 162 Weeks Road in Lopez Village
Shaw Island	Shaw Island Community Center

Appendix C

Invitees to daily conference calls regarding telephone service outages in San Juan County

Outage Occurring On	Conference Call Invitees
Any island	 San Juan County E911 Dispatcher San Juan County Sheriff's office Director of San Juan County/Town of Friday Harbor Department of Emergency Management
San Juan Island	
Orcas Island	
Lopez Island	
Shaw Island	
Decatur Island	
Blakely Island	

ATTACHMENT C

Register of all meetings, calls, and other ancillary steps taken to develop CenturyLink Outage Communication Plans

In Order No 3 the Commission imposed the following additional condition:

The parties shall file the San Juan County Emergency Communications Plan and the Washington State Emergency Communications Plan within three months of the effective date of this Order, in accordance with paragraph 30 below, as well as a reasonably detailed register of all meetings, calls, and other ancillary steps taken to develop such plans.

This Attachment C serves as the register of all meetings, calls and other ancillary steps taken to develop the two plans. CenturyLink, Staff and Public Council conducted most of their communications about plan development through e-mail. Consequently, most of the register entries that follow are of e-mails.

Date	Location	Identity of individuals involved	Specific action or event
10/20/15	e-mail	Leisa Bjerke, WUTC to Lisa Anderl, CTL	Transmitting courtesy copy of Order 03 Final Order Accepting and Adopting Settlement Agreement with Conditions
10/21/15	e-mail	Jennifer Cameron-Rulkowski Assistant Attorney General, Wash. State Attorney General's Office, UTC Division to Lisa Anderl, CTL	Asking parties to have their representatives for developing the emergency communications plans contact Sharon Wallace rather than John Cupp.
10/22/15	e-mail	Phil Grate to Sharon Wallace, WUTC Staff	Advising that Phil is the CenturyLink contact.
10/29/15	e-mail	Lisa Anderl to Wallace, Sharon (UTC); Cameron-Rulkowski, Jennifer (UTC); Gafken, Lisa (ATG); Johnson, Stefanie (ATG);	Suggesting a meeting in the San Juans on November 17.
11/02/15	e-mail	Sharon Wallace to Phil Grate	Asking for three available dates in December.
11/02/15	e-mail	Phil Grate to Sharon Wallace	Advising that December 8, 9 and 10 work.
11/04/15	e-mail	Phil Grate to Sharon Wallace	Asking about date for the San Juan meeting and the Olympia meeting.

Dete	Location	Identity of individuals involved	Specific action or event
Date	Location	identity of individuals involved	Specific action of event
11/04/15	e-mail	Sharon Wallace to Phil Grate, cc John Cupp	Advising that the San Juan County meeting will be in Friday Harbor 12/9, Noon to 3:30 p.m. and will get back to you about the Olympia meeting.
11/04/15	e-mail	Sharon Wallace to Grate, Phil; Gafken, Lisa (ATG) cc: Anderl, Lisa; Reynolds, Mark; Cameron- Rulkowski, Jennifer (UTC); Cupp, John (UTC); Fiman, Alice (UTC); Maxwell, Amanda (UTC); Beaton, Rebecca (UTC); Weinman, William (UTC); Hazzard, Pat (UTC)	Advising that the date for the San Juan meeting is Dec. 9, noon to 3:30 p.m.
11/05/15	e-mail	John Cupp to Wallace, Sharon (UTC); Grate, Phil; Gafken, Lisa (ATG). CC Anderl, Lisa; Reynolds, Mark; Cameron-Rulkowski, Jennifer (UTC); Fiman, Alice (UTC); Maxwell, Amanda (UTC); Beaton, Rebecca (UTC); Weinman, William (UTC); Hazzard, Pat (UTC)	Advising that Staff is waiting for information from the facilities person on San Juan Island.
11/09/15	e-mail	Phil Grate to John Cupp cc: Sharon Wallace	Follow up re location and attendees for 12/9 meeting.
11/09/15	e-mail	Sharon Wallace to Phil Grate, cc John Cupp	Advising that John is out of the office and will respond tomorrow.
11/10/15	e-mail	John Cupp to Phil Grate cc Sharon Wallace	The meeting will be at the San Juan County Legislative Building in Friday Harbor. We will invite Sigfred Dahl and Andy Leneweaver from the Washington Military Department. Also Brendan Cowan of San Juan County Emergency Management.

Date	Location	Identity of individuals involved	Specific action or event
11/10/15	meeting invite	John Cupp to Leneweaver, William A (MIL); Dahl, Sigfred J. (MIL); Wallace, Sharon (UTC); Maxwell, Amanda (UTC); Fiman, Alice (UTC); Brendan Cowan; Anderl, Lisa; Grate, Phil; Beaton, Rebecca (UTC); Gafken, Lisa (ATG)	Meeting notice with time, date and location for the San Juan County meeting and stating that a meeting notice for Olympia would be coming out within the week.
11/17/15	meeting invite	Cupp, John (UTC) to Leneweaver, William A (MIL); Dahl, Sigfred J. (MIL); Wallace, Sharon (UTC); Maxwell, Amanda (UTC); Fiman, Alice (UTC); 'Brendan Cowan'; Anderl, Lisa; Grate, Phil; Beaton, Rebecca (UTC); Gafken, Lisa (ATG); Anderl, Lisa; Johnson, Stefanie (ATG); Reynolds, Mark	Updated meeting notice for San Juan County.
12/04/15	agenda	Cupp, John (UTC) to Leneweaver, William A (MIL); Dahl, Sigfred J. (MIL); Wallace, Sharon (UTC); Maxwell, Amanda (UTC); Fiman, Alice (UTC); 'Brendan Cowan'; Anderl, Lisa; Grate, Phil; Beaton, Rebecca (UTC); Gafken, Lisa (ATG); Anderl, Lisa; Johnson, Stefanie (ATG); Reynolds, Mark	Agenda for the meeting in Friday Harbor on Wednesday, Dec. 9. Advising that Amanda Maxwell will send you an outline of a framework for a communications plan.

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Date	Location	Identity of individuals involved	Specific action or event
12/08/15	e-mail	Cupp, John (UTC) to Anderl, Lisa; Maxwell, Amanda (UTC); Leneweaver, William A (MIL); Dahl, Sigfred J. (MIL); Wallace, Sharon (UTC); Fiman, Alice (UTC); Grate, Phil; Beaton, Rebecca (UTC); Gafken, Lisa (ATG); Johnson, Stefanie (ATG); Reynolds, Mark	Re ferry schedule and weather forecast.
12/08/15	e-mail	Grate, Phil to Wallace, Sharon; Anderl, Lisa; Andrews, Meg A; Molzen, Mark; Reynolds, Mark; Felz, John M; Brown, Carolyn; Cini, Michael; Cupp, John (UTC); Beaton, Rebecca (UTC); Maxwell, Amanda (UTC)	CenturyLink providing documents to be discussed during tomorrow's meeting.
12/09/15	e-mail	Lisa Anderl (CTL) to Gafken, Lisa (ATG); Johnson, Stefanie (ATG)	Providing CenturyLink documents discussed during meeting.
12/09/15	Meeting at San Juan County Legislative Building, Lg. Conf. Rm, 55 Second St., Friday Harbor, WA	Cowan, Brendan, (Director San Juan County/Town of Friday Harbor Department of Emergency Management); Holleran, Dave (San Juan County E911 Coordinator); Cupp, John (UTC); Wallace, Sharon (UTC); Beaton, Rebecca (UTC); Maxwell, Amanda (UTC); Johnson, Stefanie (ATG); Leneweaver, William A (MIL); Grate, Phil (CTL); Anderl, Lisa (CTL); Andrews, Meg A (CTL); Molzen, Mark(CTL); Felz, John M (CTL); Cini, Michael (CTL); Brown, Carolyn (CTL)	San Juan County Communications Plan development meeting initiated, coordinated, and facilitated by WUTC Staff

Date	Location	Identity of individuals involved	Specific action or event
12/09/15	Meeting at San Juan County Legislative Building, Lg. Conf Rm, 55 Second St., Friday Harbor, WA	Cowan, Brendan, (Director San Juan County/Town of Friday Harbor Department of Emergency Management); Cini, Michael (CTL)	Discussed outage notification and status notices, posting locations, and contact list.
12/09/15	e-mail	Wallace, Sharon (UTC) to Grate, Phil; Anderl, Lisa; Andrews, Meg A; Molzen, Mark; Reynolds, Mark; Felz, John M; Cini, Michael; Cupp, John (UTC); Beaton, Rebecca (UTC); Brown, Carolyn; Maxwell, Amanda (UTC); Gafken, Lisa (ATG); Johnson, Stefanie (ATG); daveh@sanjuandem.net; Leneweaver, William A (MIL); Dahl, Sigfred J. (MIL); sanjuandem10@gmail.com	Sharon sending the contact list for this effort. "If you would like to add or remove others – or yourself – please let the group know. Thank you! And thank you for your work on this today. That was a productive meeting."

Date	Location	Identity of individuals involved	Specific action or event
12/10/15	e-mail	Cupp, John (UTC) to Wallace, Sharon (UTC); Grate, Phil; Anderl, Lisa; Andrews, Meg A; Molzen, Mark; Reynolds, Mark; Felz, John M; Cini, Michael; Beaton, Rebecca (UTC); Brown, Carolyn; Maxwell, Amanda (UTC); Gafken, Lisa (ATG); Johnson, Stefanie (ATG); daveh@sanjuandem.net; Leneweaver, William A (MIL); Dahl, Sigfred J. (MIL); sanjuandem10@gmail.com	Updated time for the Dec. 15 meeting changed from 9:00 to 9:30, for those driving from or through Seattle.
12/10/15	e-mail	Andrews, Meg to 'Wallace, Sharon (UTC)'; Grate, Phil; Anderl, Lisa; Molzen, Mark; Reynolds, Mark; Felz, John M; Cini, Michael; Cupp, John (UTC); Beaton, Rebecca (UTC); Brown, Carolyn; Maxwell, Amanda (UTC); Gafken, Lisa (ATG); Johnson, Stefanie (ATG); daveh@sanjuandem.net; Leneweaver, William A (MIL); Dahl, Sigfred J. (MIL); sanjuandem10@gmail.com	Meg providing her notes from the meeting in Friday Harbor.

Date	Location	Identity of individuals involved	Specific action or event
12/10/15	e-mail	Cupp, John (UTC) to Brown, Carolyn; Grate, Phil; Anderl, Lisa; Andrews, Meg A; Molzen, Mark; Reynolds, Mark; Felz, John M; Cini, Michael; Cupp, John (UTC); Beaton, Rebecca (UTC); Maxwell, Amanda (UTC); Wallace, Sharon (UTC); Gafken, Lisa (ATG); Johnson, Stefanie (ATG); daveh@sanjuandem.net; Leneweaver, William A (MIL); Dahl, Sigfred J. (MIL); sanjuandem10@gmail.com	E-mail re conference bridge for 12/15 meeting.
12/11/15	e-mail	Grate, Phil to Wallace, Sharon (UTC); Anderl, Lisa; Andrews, Meg A; Molzen, Mark; Reynolds, Mark; Felz, John M; Cini, Michael; Cupp, John (UTC); Beaton, Rebecca (UTC); Brown, Carolyn; Maxwell, Amanda (UTC); Gafken, Lisa (ATG); Johnson, Stefanie (ATG); daveh@sanjuandem.net; Leneweaver, William A (MIL); Dahl, Sigfred J. (MIL); sanjuandem10@gmail.com	Series of e-mails between Phil and Sharon re whether the plan provided by Staff is one that has been previously approved by the Commission. No, not formally, but it is what Staff has used in the past.
12/15/15	Meeting at WUTC Headquarters, Olymipa, WA	Cupp, John (UTC); Wallace, Sharon (UTC); Beaton, Rebecca (UTC); Maxwell, Amanda (UTC); Johnson, Stefanie (ATG); Leneweaver, William A (MIL); Grate, Phil (CTL); Anderl, Lisa (CTL); Andrews, Meg A (CTL); Molzen, Mark(CTL); Felz, John M (CTL); Brown, Carolyn (CTL)	Washington Communications Plan development meeting initiated, coordinated, and facilitated by WUTC Staff

Date	Location	Identity of individuals involved	Specific action or event
12/29/15	e-mail	Grate, Phil (CTL) to Cupp, John (UTC); Wallace, Sharon (UTC); Maxwell, Amanda (UTC); Johnson, Stefanie (ATG); Beaton, Rebecca (UTC); Gafken, Lisa (ATG); Leneweaver, William A (MIL); Dahl, Sigfred J. (MIL); sanjuandem10@gmail.com; daveh@sanjuandem.net; Anderl, Lisa (CTL); Reynolds, Mark (CTL); Molzen, Mark (CTL)	Phil Grate transmitting first draft of compliance filing including Attachment A - Statewide Communications Plan; Attachment B - San Juan County Communications Plan; Attachment C - Register of all meetings, calls, and other ancillary steps taken. And requesting comments by 5:00 p.m. January 5.
1/6/16	e-mail	Brendan Cowan (SJCEMD) to Amanda Maxwell (WUTC); Grate, Phil; Cupp, John (UTC); Wallace, Sharon (UTC); Johnson, Stefanie (ATG); Beaton, Rebecca (UTC); Gafken, Lisa (ATG); Leneweaver, William A (MIL); Dahl, Sigfred J. (MIL); daveh@sanjuandem.net; Anderl, Lisa	Comments and edits of first draft
1/8/16	e-mail	Mike Cini (CTL) to Phil Grate (CTL)	Input regarding meeting with SJCEMD on December 9 in Friday Harbor.
1/8/16	e-mail	Sharon Wallace (UTC) to Grate, Phil; Maxwell, Amanda (UTC); Cupp, John (UTC); Johnson, Stefanie (ATG); Beaton, Rebecca (UTC); Gafken, Lisa (ATG); Leneweaver, William A (MIL); Dahl, Sigfred J. (MIL); 'sanjuandem10@gmail.com'; 'daveh@sanjuandem.net'; Anderl, Lisa (CTL)	Comments and edits of first draft

Date	Location	Identity of individuals involved	Specific action or event
1/14/2016	e-mail	Anderl, Lisa (CTL) to Cupp, John (UTC); Wallace, Sharon (UTC); Maxwell, Amanda (UTC); Johnson, Stefanie (ATG); Beaton, Rebecca (UTC); Gafken, Lisa (ATG); Leneweaver, William A (MIL); Dahl, Sigfred J. (MIL); sanjuandem10@gmail.com; daveh@sanjuandem.net; Grate, Phil (CTL); Reynolds, Mark (CTL); Molzen, Mark (CTL)	Lisa Anderl transmitting second draft (Draft 3) of compliance filing including Attachment A - Statewide Communications Plan; Attachment B - San Juan County Communications Plan; Attachment C - Register of all meetings, calls, and other ancillary steps taken.
1/14/2016	e-mail	Maxwell, Amanda (UTC) to Anderl, Lisa (CTL); Grate, Phil (CTL); Cupp, John (UTC); Wallace, Sharon (UTC); Johnson, Stefanie (ATG); Beaton, Rebecca (UTC); Gafken, Lisa (ATG); Leneweaver, William A (MIL); Dahl, Sigfred J. (MIL); 'sanjuandem10@gmail.com'; 'daveh@sanjuandem.net'	Notifying all that Sharon Wallace and Amanda have reviewed the second draft and have no changes.
1/15/2016	e-mail	Phil Grate (CTL) to 'Maxwell, Amanda (UTC)'; Anderl, Lisa (CTL); Cupp, John (UTC); Wallace, Sharon (UTC); Johnson, Stefanie (ATG); Beaton, Rebecca (UTC); Gafken, Lisa (ATG); Leneweaver, William A (MIL); Dahl, Sigfred J. (MIL); 'sanjuandem10@gmail.com'; 'daveh@sanjuandem.net' Reynolds, Mark (CTL)	Responding to WUTC Staff's comments.

Date	Location	Identity of individuals involved	Specific action or event
1/15/2016	e-mail	San Juan County DEM [sanjuandem10@gmail.com] to Johnson, Stefanie (ATG); Grate, Phil (CTL); Maxwell, Amanda (UTC); Anderl, Lisa; Cupp, John (UTC); Wallace, Sharon (UTC); Beaton, Rebecca (UTC); Gafken, Lisa (ATG); Leneweaver, William A (MIL); Dahl, Sigfred J. (MIL); daveh@sanjuandem.net; Reynolds, Mark (CenturyLink)	Providing feedback on the second draft and a matrix showing points of agreement and disagreement and counter-proposals.
1/15/2016	e-mail	Johnson, Stefanie (ATG) to Maxwell, Amanda (UTC); Anderl, Lisa; Grate, Phil; Cupp, John (UTC); Wallace, Sharon (UTC); Beaton, Rebecca (UTC); Gafken, Lisa (ATG); Leneweaver, William A (MIL); Dahl, Sigfred J. (MIL); 'sanjuandem10@gmail.com'; 'daveh@sanjuandem.net'	Two e-mails providing comments on the second draft and on comments made by San Juan County DEM and asking why CenturyLink would not agree to the DEM's proposals.
1/15/2016	Phone call	Michael Cini (CTL) to Brendan Cowan (DEM)	Discuss DEM's counter-proposals
1/15/2016	e-mail	Grate, Phil (CTL) to 'Johnson, Stefanie (ATG)'; Maxwell, Amanda (UTC); Anderl, Lisa; Cupp, John (UTC); Wallace, Sharon (UTC); Beaton, Rebecca (UTC); Gafken, Lisa (ATG); Leneweaver, William A (MIL); Dahl, Sigfred J. (MIL); 'sanjuandem10@gmail.com'; 'daveh@sanjuandem.net'	Answering Stefanie Johnson's questions.
1/18/2016	Voice Mail	Lisa Anderl (CTL) to Brendan Cowan (San Juan County DEM)	Requesting further discussions with DEM

Date	Location	Identity of individuals involved	Specific action or event
1/18/2016	e-mail	Lisa Anderl (CTL) to Brendan Cowan (San Juan County DEM); Johnson, Stefanie (ATG); Grate, Phil (CTL); Maxwell, Amanda (UTC); Cupp, John (UTC); Wallace, Sharon (UTC); Beaton, Rebecca (UTC); Gafken, Lisa (ATG); Leneweaver, William A (MIL); Dahl, Sigfred J. (MIL); daveh@sanjuandem.net; Reynolds, Mark (CTL)	Requesting further discussions with DEM
1/192016	Phone call	Lisa Anderl (CTL) and Phil Grate (CTL) to Brendan Cowan (San Juan County DEM)	Discuss DEM's counter-proposals
1/19/2016	e-mail	Grate, Phil (CTL) to 'Johnson, Stefanie (ATG)'; Maxwell, Amanda (UTC); Anderl, Lisa; Cupp, John (UTC); Wallace, Sharon (UTC); Beaton, Rebecca (UTC); Gafken, Lisa (ATG); Leneweaver, William A (MIL); Dahl, Sigfred J. (MIL); 'sanjuandem10@gmail.com'; 'daveh@sanjuandem.net'	Transmitting redline and clean of what we believe to be the final compliance filing.