

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. 30:

At page 18 (lines 14-20) of his Cross-Answer Testimony, Mr. Akl references “industry standards at the time” as supporting his assertion that it was unreasonable and inappropriate for CLC to reply on software-based packet filters to protect against replication of malformed packets. Beyond the three highlighted sentences on page 76 of Exhibit RA-3 (regarding unused ports causing hacking risks for storage area networking (SAN)), specifically identify and produce (if written) all such “industry standards” that Mr. Akl believes support this assertion.

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.

Without waving the above objections, Staff responds as follows:

Dr. Akl’s opinions are in his testimony. *See also*, Staff Response to CLC DR 29.