

**BEFORE THE WASHINGTON
UTILITIES & TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,

Complainant,

v.

CENTURLINK COMMUNICATIONS, LLC d/b/a LUMEN TECHNOLOGIES
GROUP; QWEST CORPORATION; CENTURYTEL OF WASHINGTON, INC.;
CENTURYTEL OF INTER ISLAND, INC.; CENTURYTEL OF COWICHE, INC.;
UNITED TELEPHONE COMPANY OF THE NORTHWEST

Respondents.

DOCKET UT-210902

**CROSS EXAMINATION EXHIBIT OF PETER J. GOSE
ON BEHALF OF THE
WASHINGTON STATE OFFICE OF THE ATTORNEY GENERAL
PUBLIC COUNSEL UNIT**

EXHIBIT PJG-__XC

CenturyLink Response to Public Counsel Data Request No. 10

March 17, 2023

Shaded Information is Confidential per Protective Order in Docket UT-210902

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CenturyLink Communications, LLC, Qwest Corporation, CenturyTel of Washington, Inc., CenturyTel of Inter Island, Inc., CenturyTel of Cowiche, Inc. and United Telephone Company of the Northwest (collectively, "CenturyLink"), by and through its counsel, hereby object and respond to the Third Set of Data Requests of Public Counsel as follows:

GENERAL OBJECTIONS

CenturyLink incorporates the following general objections into each individual data request response below:

1. CenturyLink objects to each data request to the extent that it seeks or purports to seek information protected by any applicable privilege or immunity, including the attorney-client privilege and work-product doctrine. Any inadvertent production of privileged or work-product protected material is not a waiver of the status of such work product, nor is any response herein to be deemed a waiver of any privilege, doctrine, or immunity.

2. CenturyLink objects to any data request or instruction that purports to require more than is required by the applicable rules of the Commission.

3. CenturyLink objects generally to each data request to the extent (i) that the information requested is known to Public Counsel or their counsel; (ii) the request requires disclosure of information, documents, writings, records, or publications in the public domain; or (iii) the information requested is equally available to Public Counsel or their counsel from sources other than CenturyLink.

4. CenturyLink objects to each data request to the extent that it is overly broad, vague and ambiguous, unduly burdensome, and calling for information that is irrelevant or not proportional to the needs of the case.

5. These responses are provided on the basis of the best information currently available to CenturyLink after diligent effort to gather such information within its possession, custody or control. CenturyLink reserves the right to amend these responses as new information is gathered.

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PC-10 Re: CenturyLink’s Response to Public Counsel Data Request No. 8.

CenturyLink provided an incomplete response to Public Counsel’s Data Request No. 8, subpart a. Please supplement the response with the number of Regulatory Compliance Staff for the years 2016, 2017, 2022, and 2023.

RESPONSE:

CenturyLink objects to Public Counsel Data Request No. 10 on the basis that is overly broad, unduly burdensome and is not reasonably calculated to lead to the discovery of admissible evidence. Without waiving its objections, CenturyLink responds as follows.

The headcounts (for 2016, 2017, 2022) and current headcount (2023) for the Public Policy and Regulatory Compliance department are listed below. In addition to individuals in this department, numerous company employees in state and federal regulatory affairs, legal, IT, mass markets, operations, finance and other business units assist in compliance activities. Company employees who work on compliance matters are generally assigned by subject matter and not by state, and thus it is fair to estimate that most (if not all) of these individuals address compliance matters relevant to Washington.

In response to Public Counsel Data Request No. 8, CenturyLink explained (with reference to the years 2018-2021) that, while there was very little change in headcount for the Public Policy and Regulatory Compliance department, the company experienced meaningful staff changes in adjacent departments, including the departure of all four state regulatory and legal employees assigned to Washington. In addition, the company experienced a significant decline in collections personnel during 2020, a year which also presented very large and unexpected increases in customer call volumes.

Headcount changes between 2016 and 2020 are attributable to a number of factors, including normal attrition, reassignment of some personnel from the Public Policy and Regulatory Compliance department to adjacent departments and the ramping down of large projects including Connect America Fund deployment.

Finally, CenturyLink notes that the divestiture of ILEC companies and services in 20 states to Brightspeed (which transaction closed in 2022) led to staff reductions/transfers, including in departments identified above and in this data request response.

2016 - [REDACTED]
2017 - [REDACTED]
2022 - [REDACTED]
2023 - [REDACTED]

Respondent: CenturyLink Legal
Marc Blumer, Public Policy Manager

Knowledgeable witness: Peter Gose