

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,

Complainant,

v.

CENTURYLINK COMMUNICATIONS,
LLC,

Respondent.

DOCKET NO. UT-181051

**CENTURYLINK
COMMUNICATIONS, LLC'S
MOTION FOR LEAVE TO FILE
REPLY FOR THIRD-PARTY
DISCOVERY**

1. Pursuant to WAC 480-07-370(d) and WAC 480-07-375, CenturyLink Communications, LLC (“CLC”), by and through its undersigned counsel, respectfully requests the opportunity to file a reply in response to the Commission’ Staff’s Response to CLC’s Request for Third-Party Discovery from TeleCommunication Systems, Inc. d/b/a Comtech Telecommunications Corp. (“Comtech”) and Transaction Network Services, Inc. (“TNS”). This very short additional reply will bring some critical facts to the attention of the Commission.
2. In its Response, Staff acknowledges that “under the specific circumstances of this case third party discovery may be warranted.” Response at ¶ 5. Nonetheless, Staff opposes the Motion “because Staff will not have an opportunity to participate in and review the additional discovery of Comtech and TNS prior to filing its initial testimony.” *Id.* at ¶ 5. In the alternative, if the Commission authorizes the requested discovery, Staff requests an adjustment to the procedural schedule so Staff can study the information produced by Comtech and TNS before submitting its initial testimony. *Id.* at ¶ 6.
3. The timing of the requested third-party discovery and its impact on the schedule was not addressed in CLC’s Motion. The proposed reply places into context the untenable nature

of Staff's position, and shows why the Commission should permit the discovery while maintaining the existing schedule.

4. As such, CLC respectfully requests leave to file a Reply in Support of CLC's Motion for Third-Party Discovery, which CLC attaches to this Motion for Leave as *Exhibit A*.

DATED this 21st day of July 2021.

CENTURYLINK COMMUNICATIONS, LLC



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