

**BEFORE THE WASHINGTON  
UTILITIES & TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,

Complainant,

v.

CENTURYLINK 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.

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DOCKET UT-210902

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

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**EXHIBIT PJG-\_\_XCr**

CenturyLink Response to Public Counsel Data Request No. 11, with Confidential  
Attachments 11a and 11b

March 17, 2023

(Updated March 24, 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-11 **Re: CenturyLink's Response to Public Counsel Data Request No. 8.**  
Please provide an organizational chart for the Regulatory Compliance department referred to in response to Public Counsel's Data Request No. 8. Please provide the organizational chart at the time the Governor's Proclamation was effective and provide an additional organizational chart if it has been updated since that time. Please provide brief job description for the roles on the chart.

**RESPONSE:**

CenturyLink objects to Public Counsel Data Request No. 11 on the basis that is overly broad, unduly burdensome and is not reasonably calculated to lead to the discovery of admissible evidence. CenturyLink further objects to the extent that the request demands that CenturyLink create documents that do not already exist. Without waiving its objections, CenturyLink responds as follows.

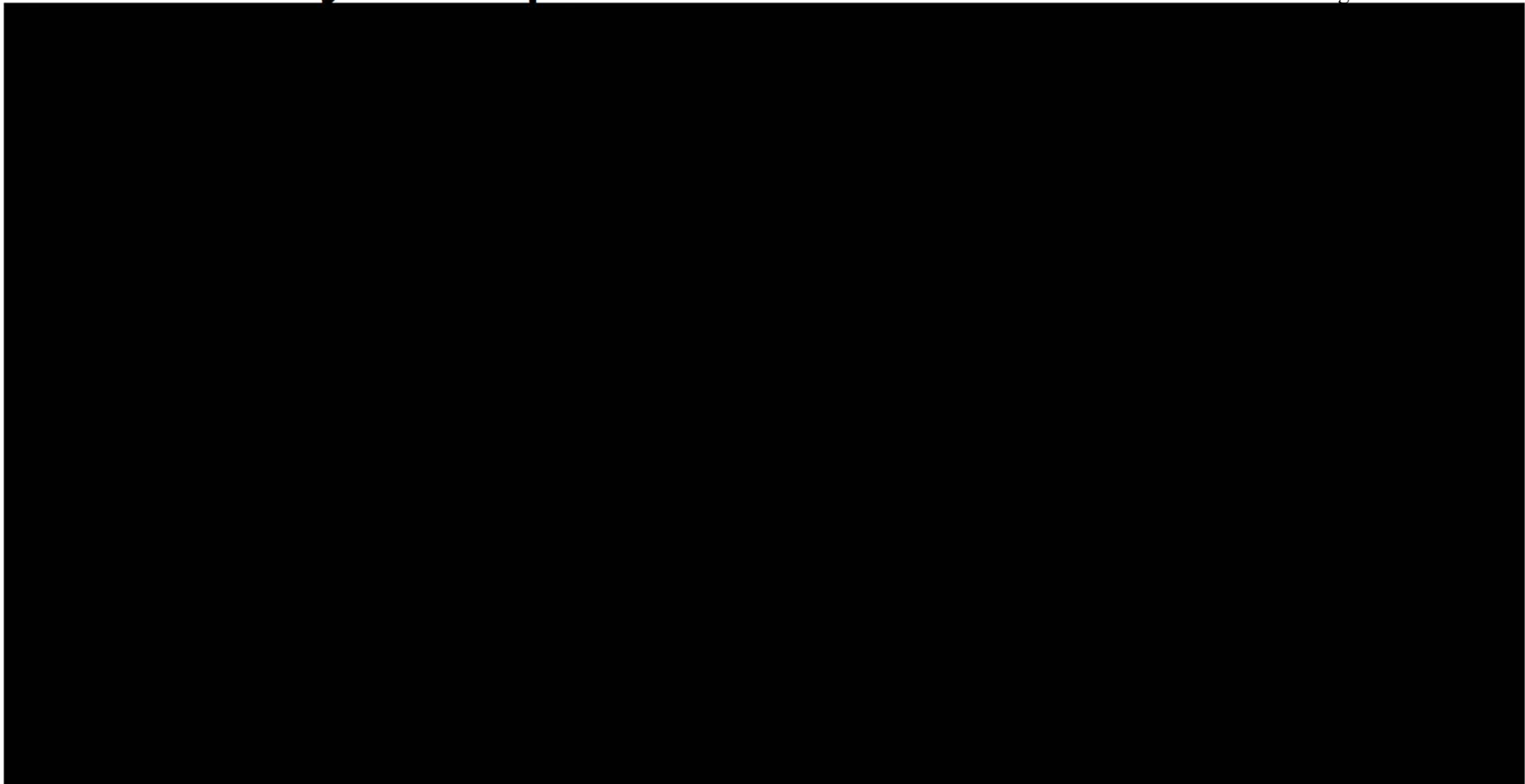
Attached, respectively as Confidential Attachments PC-11a and PC-11b, are Public Policy and Regulatory Compliance department organization charts (inclusive of descriptions) for January 11, 2021 and current (2023).

**Respondent:** CenturyLink Legal  
Marc Blumer, Public Policy Manager  
**Knowledgeable witness:** Peter Gose

**CENTURYLINK'S RESPONSE TO PUBLIC COUNSEL DATA REQUEST NO. 11**

**CONFIDENTIAL ATTACHMENT 11A**

# Public Policy & Compliance



**CENTURYLINK'S RESPONSE TO PUBLIC COUNSEL DATA REQUEST NO. 11**

**CONFIDENTIAL ATTACHMENT 11B**

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