

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

RIVERCOM 911,

Complainant,

vs.

FRONTIER COMMUNICATIONS
NORTHWEST, INC. AND QWEST
CORPORATION, D/B/A CENTURYLINK
QC,

Respondents.

DOCKET NO. UT-171016

CENTURYLINK'S ANSWER TO
FORMAL COMPLAINT

- 1 Rivercom 911 filed a Complaint with the Washington Utilities and Transportation Commission (Commission) on September 29, 2017. In that Complaint, Rivercom 911 names both Frontier Communications and CenturyLink as respondents. CenturyLink received a copy of the Complaint from the Commission on October 5, 2017.
- 2 CenturyLink is filing this answer on October 23, 2017 as required under WAC 480-07-370(2)(c). It is timely under WAC 480-07-370(2)(b). Pursuant to WAC 480-07-370(e)(i) CenturyLink states that it is represented in this matter by Lisa A. Anderl, whose contact information is in the signature block below.
- 3 Contemporaneously with this Answer, CenturyLink is filing a Motion to Dismiss under WAC 480-07-375 for failure to state a claim against CenturyLink upon which relief may be granted.
- 4 Pursuant to WAC 480-07-370(2)(e)(ii), CenturyLink states its admissions or denials of all material allegations of the formal complaint. All allegations are denied unless specifically admitted herein.

- 5 CenturyLink admits that Rivercom 911 is a PSAP in Wentachee. CenturyLink is without sufficient knowledge or information to form a belief as to the remainder of the allegations about Rivercom 911, Frontier, 911 calls, and any other issues or activity contained in (unnumbered) paragraphs 1, 2, 3 and 4 of the Complaint and therefore denies the same.
- 6 With regard to (unnumbered) paragraphs 5 and 6 of the Complaint, CenturyLink denies that it failed to notify Rivercom 911 of an outage. CenturyLink sent Rivercom 911 four (4) e-mails regarding the outage, and those e-mails were sent as soon as CenturyLink became aware of the outage. CenturyLink denies that it had the ability or obligation to be aware of the outage earlier. The outage was not in CenturyLink's network, nor was it in the 911 network. Rather, as CenturyLink understands the facts, the outage was a local services outage affecting Frontier's network and the ability of a relatively small number of Frontier customers to reach CenturyLink's selective router to complete a 911 call.
- 7 CenturyLink states that there are no allegations in the Complaint that state any legal duty or obligation of CenturyLink toward Rivercom that CenturyLink did not perform. Rivercom does not ask for specific relief as to CenturyLink, and for these reasons, and as stated in the Motion to Dismiss, CenturyLink asks that Complaint be denied or that CenturyLink be dismissed as a party to this proceeding.

Respectfully submitted this 23rd day of October 2017.

CENTURYLINK

/s/ Lisa A. Anderl

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