

**BEFORE THE  
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION

v.

CENTURYLINK COMMUNICATIONS LCC 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

**DOCKET UT-210902**

**ANSWER AND AFFIRMATIVE  
DEFENSES**

*1* The above-named Respondents ("CenturyLink") hereby submit this Answer to the Complaint of the Commission Staff. To the extent allegations are not expressly admitted, they are denied. CenturyLink answers as follows to each paragraph of the Complaint:

**I. PARTIES**

*2* Admit, with regard to enforcement of Title 80 and the rules and orders of the Commission.

*3* Admit.

*4* Admit that Qwest Corporation is a Colorado corporation operating as a telecommunications company in the state of Washington. Admit that Qwest Corporation is an operating company.

*5* Admit that CenturyTel of Washington, Inc.; CenturyTel of Cowiche, Inc., and

CenturyTel of Inter Island, Inc., are Washington corporations operating as telecommunications companies in the state of Washington. Admit that each is an operating company.

**6** Admit that United Telephone Company of the Northwest is an Oregon corporation operating as a telecommunications company in the state of Washington.

**7** Does not require response.

## **II. BACKGROUND**

**8** The Governor's proclamations speak for themselves.

**9** The Governor's proclamations speak for themselves.

**10** Admit that two of CenturyLink's collections practices are disconnection and suspension of service.

**11** Admit that the Lumen Companies use the term "disconnection" to refer to the severing of a customer from Lumen's network, and that the account of a disconnected customer is eliminated from the Lumen Companies' systems.

**12** CenturyLink admits that, between March 2020 and September 2021, despite the company suppressing the vast majority of disconnections for non-payment, a small number of customer accounts were disconnected.

**13** CenturyLink admits that suspension is a status wherein the customer remains on the CenturyLink network, but cannot utilize services.

**14** CenturyLink admits that, between March 2020 and September 2021, despite the company suppressing the vast majority of suspensions for non-payment, a small number

of customer accounts were suspended.

15 Admit.

### **III. JURISDICTION**

16 Deny.

### **IV. APPLICABLE LAWS AND REGULATIONS**

17 State law speaks for itself.

18 State law speaks for itself.

19 State law speaks for itself.

20 State law speaks for itself.

21 State law speaks for itself.

22 Admit.

23 The AFOR speaks for itself.

24 The AFOR speaks for itself.

25 The Governor's proclamations speak for themselves.

26 State law and the Governor's proclamations speak for themselves.

27 The Governor's proclamations speak for themselves.

28 The Governor's proclamations speak for themselves.

29 State law speaks for itself.

30 State law speaks for itself.

## **V. FIRST CAUSE OF ACTION**

31 CenturyLink realleges its responses to paragraphs 2 through 30, above.

32 State law speaks for itself.

33 Deny.

34 Deny.

35 CenturyLink realleges its responses to paragraphs 12 and 14.

36 Deny.

## **VI. REQUEST FOR RELIEF**

37 CenturyLink denies the allegations of violations.

38 CenturyLink denies the allegations of violations and the appropriateness of penalties.

39 CenturyLink denies the allegations of violations and the appropriateness of remedies.

## **VII. PROBABLE CAUSE**

40 Deny.

## **VIII. AFFIRMATIVE DEFENSES**

41 In addition to its answer, above, CenturyLink alleges the following affirmative defenses:

42 The Commission lacks jurisdiction over this matter.

43 The Complaint fails to state a claim upon which relief can be granted.

Respectfully submitted this 26th day of April 2022.

CENTURYLINK



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