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January 31, 2019



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State of WASH.
UTIL. AND TRANSP.
COMMISSION

Via Web Portal

Mr. Mark L. Johnson
Executive Director and Secretary
Washington Utilities & Transportation Commission
1300 S. Evergreen Park Drive SW
P.O. Box 47250
Olympia, Washington 98504-7250

**Re: Docket No.: UT-171082
Request to Stop Tracking Service Denials**

Dear Mr. Johnson:

On October 2, 2018 the Commission sent a Notice requiring all local exchange companies to track denials of service due to a lack of facilities. The Notice contemplated that the requirement might sunset at the conclusion of the rulemaking docket, No. UT-180831.

This was not data that CenturyLink formally tracked or retained in any sort of any easily-identifiable or searchable way. Indeed, because of the way customers now interface with CenturyLink via multiple platforms, including self-directed searches for service availability by address, click to chat, etc., it may be impossible to fully capture every inquiry. Nevertheless, in order to comply with the Commission's directive, CenturyLink began investigating how it could capture a set of data that would be reasonably comprehensive, particularly knowing that the data gathering exercise would be temporary.

The process that CenturyLink arrived at is both time-consuming and burdensome. It involves at least three different people to manually search various facilities and ordering databases several times a month, pull orders that were coded as denied, and manually review those orders to determine: (1) if they were residential orders, (2) if they were for telephone service or internet, and (3) whether they were from customers within CenturyLink exchange territory. If the answers are (1) yes, (2) telephone, and (3) yes, they are included on a spreadsheet and retained for tracking purposes.

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CenturyLink has data for October through December of 2018, and the efforts are ongoing into 2019. CenturyLink would like to discontinue these efforts as they demand time from employees that takes them away from their usual responsibilities. Therefore, CenturyLink respectfully requests that the Commission approve continued tracking of this data through February 2019, and termination of that responsibility effective March 1, 2019.

Sincerely,

/s/ Lisa A. Anderl
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LAA/jga

cc: Service List