



STATE OF WASHINGTON  
UTILITIES AND TRANSPORTATION COMMISSION  
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March 6, 2019

**NOTICE OF HOLDING REQUEST IN ABEYANCE**

RE: *Washington Utilities and Transportation Commission v. Qwest Corporation d/b/a CenturyLink QC*,  
Docket UT-171082

On August 23, 2018, the Washington Utilities and Transportation Commission (Commission) entered Order 03 in this docket, which, among other provisions, required Qwest Corporation d/b/a CenturyLink QC (CenturyLink or Company) to keep a record of all requests for residential local exchange service that the Company denies due to lack of facilities pending completion of the rulemaking in Docket UT-180831.

On January 31, 2019, CenturyLink filed a letter with the Commission requesting to be relieved of this obligation. The Company contends that it must track this information manually, which is both time-consuming and burdensome and demands efforts from employees that takes them away from their usual responsibilities.

On February 13, 2019, the Public Counsel Section of the Washington Attorney General's Office (Public Counsel) filed a letter recommending that the Commission deny CenturyLink's request. Public Counsel states that the required record-keeping is not unreasonable, and tracking this information will enable the Commission and stakeholders to better understand the circumstances under which CenturyLink denies consumers' service requests, which is fundamental to determining how to clarify companies' line extension obligations.

On February 19, 2019, Commission staff (Staff) filed a response opposing CenturyLink's request. Staff agrees with Public Counsel's response and notes that the Commission has required all local exchange companies to track service denials due to lack of facilities. The requirement is for a limited period of time, and Staff opines that any alleged burden the

Company incurs to comply does not outweigh the importance of having the information, which Staff intends to use to inform the path the Commission should take in the rulemaking. Staff also contends that CenturyLink's request is actually a petition to amend Order 03 and that the Company has not satisfied the requirements for such a petition.

The Commission is sensitive to CenturyLink's concerns about the time and effort the Company is expending to track the required information. We nevertheless agree with Public Counsel and Staff that the information is necessary to better understand the need for WAC 480-130-071 and any revisions to that rule, at least for the time being. While Staff is technically correct that any request to amend Order 03 should be in the form of a petition filed pursuant to WAC 480-07-870 or 480-07-875, we hold open the possibility that a less formal means of requesting relief from the record-keeping requirement in Order 03 might be appropriate under the circumstances presented here.

Accordingly, we will hold CenturyLink's request in abeyance until the Company has collected and submitted six months of the requisite data. After that time, CenturyLink may renew its request. Any such filing, however, should provide sufficient detail on the costs the Company is incurring to comply with Order 03 and an explanation of why those costs outweigh the benefits of the data to the Commission and stakeholders in Docket UT-180831.

Dated at Olympia, Washington, and effective March 6, 2019.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

GREGORY J. KOPTA  
Administrative Law Judge