

**Exh. JDW-3
Docket UT-240029
Witness: John D. Webber**

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of the Petition of the

DOCKET UT-240029

**QWEST CORPORATION;
CENTURYTEL OF WASHINGTON;
CENTURYTEL OF INTERISLAND;
CENTURYTEL OF COWICHE; AND
UNITED TELEPHONE COMPANY OF
THE NORTHWEST**

**to be Competitively Classified Pursuant
to RCW 80.36.320**

EXHIBIT TO TESTIMONY OF

JOHN D. WEBBER

**ON BEHALF OF STAFF OF
WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION**

CenturyLink Responses to UTC Staff DRs 56-57 and Supp. 19, 47-48

April 3, 2024

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Lumen's Responses to UTC Staff Data Request Nos. 56-57 and
Supplemental Requests for 19, 47 and 48
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Lumen, by and through its counsel hereby objects and responds to UTC Staff Data Request Nos. 56-57 and Supplemental Request Nos. 19, 47, and 48:

GENERAL OBJECTIONS

Lumen incorporates the following general objections into each individual data request response below:

1. Lumen 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. Lumen objects to any data request or instruction that purports to require more than is required by the applicable rules of the Commission.
3. Lumen objects generally to each data request to the extent (i) that the information requested is known to UTC Staff 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 UTC Staff or their counsel from sources other than Lumen.
4. Lumen 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 Lumen after diligent effort to gather such information within its possession, custody or control. Lumen reserves the right to amend these responses as new information is gathered.

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UTC STAFF DATA REQUEST NO. 56:

In its response to Staff DR No. 35, CenturyLink provided a KMZ file; however, this file appears to include 281 wire center records and does not include the Lewiston-Sherwood wire center. Please provide a shapefile that includes one record for each wire center and includes all wire centers that are fully or partially in Washington State, or in the alternative, please confirm that Staff has CenturyLink's permission to use in the adjudicative stage of this proceeding the shapefile CenturyLink provided in response to Staff Informal DR No. 9.

RESPONSE:

See Attachment Staff 56.

Respondent(s): Peter Gose, Director State and Local Government Affairs
(peter.gose@lumen.com; 303-324-5678)
Jacob Barlow, Government Operations Manager
(Jacob.barlow@lumen.com; 303-707-7004)

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UTC STAFF DATA REQUEST NO. 57:

Ref: Gose Direct Testimony at page 36, re: proposed second condition, Discontinuance of Standalone Residential Services, Mr. Gose states: "Under CenturyLink's expiring AFOR, Commission approval is required before CenturyLink can discontinue stand-alone residential or business services in an area." ... "The CenturyLink ILECs will not discontinue stand-alone residential exchange services to any area in which a "Protected Customer" resides without obtaining Commission approval." Provide CenturyLink's definition of "area" as used in these statements.

RESPONSE:

In Paragraph 44 of the Petition, CenturyLink offered to carry forward the use of the term "area" from the 2014 AFOR. That term was not defined in the AFOR. CenturyLink is open to collaborate on the meaning of "area," but generally believes it to refer to a geographic region that could be as large as a wire center and as small as a neighborhood or cable run.

Respondent(s): CenturyLink Legal
Peter Gose, Director State and Local Government Affairs
(peter.gose@lumen.com; 303-324-5678)

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FIRST SUPPLEMENTAL TO STAFF DATA REQUEST NO. 19:

Staff DR No. 19 asked Lumen to provide, “[f]or the period 1/1/2019 through 12/31/2023 . . . all trouble tickets created by CenturyLink in response to customer trouble reports from its single-line basic exchange service customers in Washington, both residential and small business. Please provide all fields in those trouble ticket records, including but not limited to, those for: customer name, customer address, and telephone number; the date the report was made; type of service subscribed to; date the trouble was cleared; and all notes made by repair technician(s), trouble cause(s), and disposition of the trouble. Provide your response in electronic format, in one or more Excel-compatible (.xlsx) spreadsheets.”

CenturyLink, in response, provided the trouble tickets for Qwest Corporation. In the data provided, CenturyLink limited the address column to 20 characters, which often truncates the data to eliminate city names and zip codes.

Please:

- a. Confirm that Lumen provided the trouble tickets only for Qwest Corporation, and did not provide trouble tickets for the other four CenturyLink ILECs;
- b. Explain why Lumen failed to provide the trouble tickets for the other four CenturyLink ILECs, if confirming in subpart (a);
- c. Provide the trouble tickets for the other four CenturyLink ILECs; and
- d. Provide complete addresses, including city names and zip codes, for each trouble ticket entry in CenturyLink's answer to Data Request No. 19.

RESPONSE:

- a. See CenturyLink's 2nd Supplemental Response to Staff DR 19, which includes trouble ticket information for the legacy Embarq and CenturyTel ILECs in Washington. Those companies' data are housed in different legacy systems, and has been more challenging to extract for purposes of responding to Staff data request.
- b. See response to subpart a.
- c. See response to subpart a.
- d. Legacy Qwest Corporation data (provided in CenturyLink's 1st Supplemental Response to Staff DR 19) is limited to 20 characters, and cannot be extended in the manner requested without tremendous manual effort.

Respondent(s): Peter Gose, Director State and Local Government Affairs
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Jim DiManna, Government Operations Manager
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FIRST SUPPLEMENTAL TO UTC STAFF DATA REQUEST NO. 47:

Staff's original DR No. 47-a had sought additional data for the CenturyLink subscribers enumerated in the Competition Study's "Access Line Count Data (C)" tab – which consisted of VOIP and Voice lines provided by CenturyLink's ILECs and CLECs as-of 6/30/22 and 6/30/23. CenturyLink objected that the DR required a special study. Please:

- a. Explain why Staff's Data Request required a special study given the competition study and the work necessary to identify CenturyLink's protected customers; and
- b. Provide the locations of all Voice subscribers served by the CenturyLink ILECs as-of 6/30/23, disaggregated by Customer Segment (Business, Consumer, Wholesale), in a shape file (.shp) or other widely accepted GIS format. If responding to this request would require a special study, then in the alternative provide the customer names and addresses of all Voice subscribers served by the CenturyLink ILECs as-of 6/30/23, disaggregated by Customer Segment (Business, Consumer, Wholesale), in electronic format (e.g. Excel spreadsheet). Note that for the Wholesale segment the end user's name and address should be provided, not the CLEC purchasing the Wholesale service.

RESPONSE:

- a. See Attachment Staff 47a1(C), a zip file containing the shapefile of the CenturyLink ILECs' voice and VoIP customers in Washington. Please note that approximately 900 customer locations could not be mapped in the shapefile; those are listed in Attachment Staff 47a2(C). See also Attachment Staff 47a3(C), an XLS format containing the same voice/VoIP customer information.
- b. See response to subpart a.

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FIRST SUPPLEMENTAL TO UTC STAFF DATA REQUEST NO. 48:

Staff DR No. 48 sought the “Customer name; Customer Address; Serving Wire Center; Class of Service provided by CenturyLink; and the customer location” of protected customers in a shapefile or other widely accepted GIS format. CenturyLink provided an answer that did not include the Serving Wire Center, Class of Service, Class of Service provided by CenturyLink, or the customer location. Please provide that information, either in a shapefile or other widely accepted GIS format or a list containing the information.

RESPONSE:

See CenturyLink's response to Staff Data Request No. 48. Attachment Staff 48(C) contains all of the information sought. Simply click on the points plotted on the map, which opens a table containing all the information for that protected customer location.

Respondent(s): CenturyLink Legal