

ATTACHMENT A

[Service Date November 5, 2014]

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,)	DOCKET UT-132234
)	
Complainant,)	COMPLAINT
)	
v.)	
)	
CENTURYTEL OF INTER ISLAND, INC. D/B/A CENTURYLINK,)	
)	
Respondent.)	
.....)	

1 The Washington Utilities and Transportation Commission (Commission), on its own motion, and through its Staff, alleges as follows:

I. BACKGROUND

2 Telecommunications carriers providing service in the state of Washington must comply with Commission rules designed to protect telecommunications consumers in Washington state. Washington Administrative Code (WAC) 480-120-412, the Major Outages rule, requires telecommunication carriers not only to keep the public informed about an outage but to immediately notify and keep informed certain state and local agencies, including those responsible for emergency services. This Complaint arises from allegations of violations by CenturyLink of Inter Island, Inc. d/b/a CenturyLink (“CenturyLink” or “Company”) of the Major Outages rule.

3 In the early morning hours of Tuesday, November 5, 2013, CenturyLink customers on the San Juan Islands experienced a service outage that isolated them from the mainland, disrupted 911 and long-distance service, and limited interisland calling. The cause of the outage was a break in the underwater cable connecting Lopez Island and the main switch on San Juan Island.

4 CenturyLink monitoring systems detected a loss of connection to the Friday Harbor switch at 3:45 a.m. on November 5, and the outage was reported to the Commission at

3:47 a.m. The report to the Commission described the outage as follows: “5831 lines impacted due to toll isolation. Possible maintenance activity.” Further, the report provided an estimated restoral time of 8:00 a.m. that day. CenturyLink knew later that day that the outage actually was due to a severed underwater cable. It was not until Friday, November 8, however, that CenturyLink officially communicated with Commission Staff concerning the actual nature and extent of the outage.

- 5 On the day of the break, San Juan County Department of Emergency Management (County Department of Emergency Management), which coordinates 911 services, did not receive any information from CenturyLink until after 3:00 in the afternoon. The San Juan Islands experienced a massive 911 outage, and the County Department of Emergency Management received information about it only from indirect and unconfirmed local sources. Finally, at 3:13 p.m., CenturyLink notified the County Department of Emergency Management and the State 911 office that splicers had started working on the fiber cut at 1:30 p.m., and the Company hoped to resolve it soon.
- 6 In the following days, according to Mr. Cowan, Director of San Juan County Department of Emergency Management, he never received clear information from CenturyLink. The information he did receive was sparse and confusing.
- 7 CenturyLink customers also reported receiving insufficient information from CenturyLink. Public officials, business owners, and other residents stated at the Commission’s public hearing held December 9, 2013, and in written comments to the Commission that they were unable to get reliable information about what was happening and the status of the repairs. Although CenturyLink issued daily news releases to the media, it was not until about the third day that the Company posted information locally. Then, CenturyLink posted news releases at some business locations in Friday Harbor on San Juan Island but not on any of the other islands. Further, although CenturyLink produced a plan that addressed speaking to the media and external messaging, it did not implement any plan that provided for disseminating information to the public and public officials in the outage area or that was effective for this type of outage.

II. PARTIES

- 8 The Washington Utilities and Transportation Commission is an agency of the State of Washington, authorized by state law to regulate the rates, services, facilities, and practices of public service companies, including telecommunications companies, under RCW Title 80.

- 9 CenturyTel of Inter Island, Inc. d/b/a CenturyLink is a telecommunications company providing service in the state of Washington and is a wholly owned subsidiary of CenturyLink, Inc.

III. JURISDICTION

- 10 The Commission has jurisdiction over this matter pursuant to RCW 80.01.040, RCW 80.04.110, RCW 80.04.380, RCW 80.36, and WAC 480-120.
- 11 The Commission has jurisdiction over the Company because CenturyLink is subject to supervision and regulation by the Commission as a telecommunications company under RCW 80.36; and as a public service company under RCW 80.04.010 and RCW 80.04.

IV. CLAIMS AND CAUSES OF ACTION

A. FIRST CAUSE OF ACTION

(Violation of WAC 480-120-412(2), notice to Commission)

- 12 The Commission, through its Staff, realleges the allegations contained in paragraphs 2 through 11 above.
- 13 WAC 480-120-412(2) requires telecommunications companies subject to Commission regulation to notify the Commission as soon as possible when a company receives notice of or detects a major outage.
- 14 CenturyLink violated WAC 480-120-412(2) three times when it failed, for three days, to inform the Commission that the Company had detected a major outage.

B. SECOND CAUSE OF ACTION

(Violation of WAC 480-120-412(3), notice to county and state emergency agencies)

- 15 The Commission, through its Staff, realleges the allegations contained in paragraphs 2 through 11 above.
- 16 Pursuant to WAC 480-120-412(3), when a major outage affects any emergency response facility, a company must notify immediately the county E911 coordinator and the state emergency management authorities, and provide periodic updates on the status of the outage.

- 17 CenturyLink violated WAC 480-120-412(3) ten times when it neglected to immediately notify the San Juan County Department of Emergency Management and by failing to provide meaningful periodic updates on the status of the outage from November 5 to November 15, 2013.

C. THIRD CAUSE OF ACTION
(Violation of WAC 480-120-412(5), implement procedures to disseminate information to the public and public officials)

- 18 The Commission, through its Staff, realleges the allegations contained in paragraphs 2 through 11 above.
- 19 WAC 480-120-412(5) requires telecommunications companies subject to Commission regulation to implement procedures to disseminate information to the public, public officials, and the media during major outage recovery efforts.
- 20 CenturyLink violated WAC 480-120-412(5) by failing to implement procedures specific to this outage to disseminate information to the public and public officials.

D. FOURTH CAUSE OF ACTION
(Violation of WAC 480-120-412(5), information to public)

- 21 The Commission, through its Staff, realleges the allegations contained in paragraphs 2 through 11 above.
- 22 WAC 480-120-412(5) requires telecommunications companies subject to Commission regulation to disseminate information to the public.
- 23 CenturyLink violated WAC 480-120-412(5) 15,921 times by failing to communicate adequately with its customers at each of its 15,921 access lines.

V. APPLICABLE LAW

- 24 Under RCW 80.04.380, the Commission may penalize a public service company that violates any rule of the Commission up to \$1,000 for each and every offense. Under the statute, every violation is considered a separate and distinct offense, and, in the case of a continuing violation, every day's continued violation is deemed to be a separate and distinct offense.

VI. REQUEST FOR RELIEF

- 25 Staff requests that the Commission find that CenturyLink committed 15,935 violations of WAC 480-120-412, the Major Outages rule, as set forth in the allegations above.
- 26 Staff further requests that the Commission impose monetary penalties on CenturyLink under RCW 80.04.380 of up to \$1,000 for each violation.
- 27 Staff further requests that the Commission order such other or further relief as is appropriate under the circumstances.

VII. PROBABLE CAUSE

- 28 Based on a review of Staff's report on its investigation of CenturyLink, dated August 2014, and consistent with RCW 80.01.060 and WAC 480-07-307, the Commission finds probable cause exists to issue this complaint.

DATED at Olympia, Washington, and effective DATE, 2014.

WASHINGTON STATE UTILITIES AND TRANSPORTATION COMMISSION

GREGORY J. KOPTA
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ATTACHMENT B

[Service date October 20, 2015]

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND)	
TRANSPORTATION COMMISSION,)	DOCKET UT-132234
)	
Complainant,)	
)	ORDER 03
)	
v.)	
)	
CENTURYTEL OF INTER ISLAND,)	FINAL ORDER ACCEPTING AND
INC. D/B/A CENTURLINK,)	ADOPTING SETTLEMENT
)	AGREEMENT WITH
)	CONDITIONS
Respondent.)	
.....)	

Synopsis: The Commission accepts and adopts the revised Settlement Agreement with three conditions: 1) CenturyLink shall extend an invitation to the Washington Military Department to participate in the drafting of the Washington State Emergency Communications Plan; 2) The parties shall file the San Juan County Emergency Communications Plan and the Washington State Emergency Communications Plan within three months of the effective date of this Order, in accordance with paragraph 30 below, as well as a reasonably detailed register of all meetings, calls, and other ancillary steps taken to develop such plans; and 3) The Commission assesses the full original penalty of \$173,210 against CenturyLink and suspends all but \$50,000 for one year following the Commission’s approval of the Emergency Communications Plans. The suspended penalty (\$123,210) shall be waived after this one year period if CenturyLink is not found to have violated WAC 480-120-412 or the provisions of either emergency communications plan during that time. If the Commission finds that CenturyLink has violated WAC 480-120-412 or the provisions of either emergency communications plan during the one year period, the suspended penalty (\$123,210) shall be imposed.

1 **PROCEEDING.** On November 5, 2014, the regulatory staff (Staff) of the Washington Utilities and Transportation Commission (Commission) filed a complaint against CenturyTel of Inter Island, Inc. d/b/a CenturyLink (CenturyLink or Company). The complaint alleges CenturyLink committed 15,935 violations of WAC 480-120-412, the

Commission rule related to major outages, and recommended the Commission assess a penalty of up to \$173,210.¹

- 2 **PARTY REPRESENTATIVES.** Lisa Anderl, Senior Associate General Counsel, Seattle, Washington, represents CenturyLink. Lisa Gafken, Assistant Attorney General, Seattle, Washington, represents the Public Counsel Section of the Washington Office of the Attorney General (Public Counsel). Jennifer Cameron-Rulkowski, Assistant Attorney General, Olympia, Washington, represents Staff.²

MEMORANDUM

I. Background and Procedural History

- 3 On November 5, 2013, CenturyLink's voice and data customers in the San Juan Islands experienced a widespread service interruption when a portion of an underwater fiber cable on the Company's telecommunications and broadband system failed as a result of a severed segment that connected facilities on Lopez Island to the Company's main switch and other network elements on San Juan Island.³ As a consequence of the system failure, CenturyLink customers on Orcas, Decatur, and Lopez Islands experienced complete and prolonged disruptions to their local, long distance, and data services (i.e., broadband service) to varying degree. During the pendency of the outage, some local intra-island service was restored on each island, but off-island calling was gradually restored as alternative network arrangements with other entities were implemented.⁴

¹ Commission Staff, with the assistance of outside consultant, Robert Munoz, Undersea Cable Consultants, LLC, prepared an investigation report (Investigation Report) that details the ten day service outage that began on November 5, 2013, when an underwater fiber failure caused extensive local, toll and data service interruption in San Juan County.

² In formal proceedings, such as this, the Commission's regulatory staff participates like any other party, while the Commissioners make the decision. To assure fairness, the Commissioners, the presiding administrative law judge, and the Commissioners' policy and accounting advisors do not discuss the merits of this proceeding with the regulatory staff, or any other party, without giving notice and opportunity for all parties to participate. *See*, RCW 34.05.455.

³ Investigation Report at 9.

⁴ *Id.*

- 4 During the network disruption, affected customers also were unable to dial 911 for emergency services.⁵ In a press release, CenturyLink instructed customers to call their local fire department in the event of an emergency.⁶ CenturyLink customers on San Juan Island could access 911 but not inter-island or long-distance service.⁷
- 5 According to Staff's Investigation Report, at 3:47 a.m. on November 5, 2013, the first day of the network outage, CenturyLink's automated outage reporting system provided notification of a service disruption, approximately 2 minutes after it began and reported a projected restoration time of 8:00 a.m.⁸ Subsequent to the initial alert, the Company did not officially communicate with Staff again about the actual nature and extent of the outage until November 8, 2013.⁹ Additionally, the San Juan County Department of Emergency Management (County DEM), which coordinates 911 services for the County, did not receive any information from the Company until 3:00 p.m. on the day the outage occurred, nearly 12 hours following the start of the outage.¹⁰ The Director of the County DEM complained to Staff that "he never received clear information from CenturyLink... [and t]he information he did receive was sparse and confusing."¹¹ According to Duncan Wilson, the Friday Harbor Town Administrator, "[t]he information that was being passed down the line that we could pass on to our citizens was muddled at best."¹²
- 6 At the Commission's public comment hearing on December 9, 2013, small business owners, residents, and public officials also reported receiving insufficient and inconsistent information from CenturyLink during the course of the outage.¹³ As facts surrounding the scope and magnitude of the outage emerged, the Company began issuing

⁵ *Id.*

⁶ *Id.*

⁷ *Id.*

⁸ Complaint, ¶ 4. The alert emanated from an automated public utility commission (PUC) system CenturyLink utilizes for reporting network outages to state regulatory agencies such as the Commission.

⁹ *Id.*

¹⁰ *Id.*, ¶ 5.

¹¹ *Id.*, ¶ 6.

¹² Investigation Report at 20. Although the Friday Harbor Town Administrator is referred to in the Investigation Report as both Mr. Duncan and Duncan Wilson, we've confirmed the correct name is Duncan Wilson.

¹³ Complaint, ¶ 7.

daily news releases to the media but didn't begin posting such information locally until the third day of the outage.¹⁴ Even then, CenturyLink's media postings were only in Friday Harbor on San Juan Island, not on any of the other islands.¹⁵ Staff asserted in the complaint that the Company "did not implement any plan that provided for disseminating information to the public and public officials in the outage area or that was effective for this type of outage."¹⁶

7 In addition to the testimony received during the public comment hearing, a number of customers submitted written comments to the Commission expressing their frustrations with what they claimed as the Company's ineffective and disorganized process for disseminating information regarding the outage. Customers noted that "CenturyLink was slow in releasing information about the outage and was completely dependent on media outlets to distribute their press releases,"¹⁷ they asked for the Company to "just give us the information without spin,"¹⁸ and noted that "[t]here is no excuse for lack of a backup [system]."¹⁹

8 Notwithstanding the communications' challenges that arose during the outage, the Company's response to the technical aspects of addressing the severed submarine fiber optic cable and establishing alternative facilities to restore service were notably effectual and particularly resourceful, given the adverse operational and climactic conditions facing its restoral efforts. For example, as Staff's consultant, Mr. Munoz stated:

The cable service was restored in less than 10 days after the break, which is somewhat unusual for shallow water repairs. Shallow water repairs require specialized equipment such as a barge, navigation tools, cable chute, a powered cable reel and experienced repair personnel. A ROV (Remote Operated underwater Vehicle) was also on site to assist with locating the cable break and performing the repair. For all of these tools and resources to be available on such

¹⁴ *Id.*

¹⁵ *Id.*

¹⁶ *Id.*

¹⁷ Investigation Report at 20 (citing to a comment from Paul Kamin, Manager, Eastsound Water Users Association).

¹⁸ *Id.* (quoting a comment from Sandra Green of the Four Winds Camp).

¹⁹ *Id.* (citing Roger Sherman of Microsoft).

short notice is an achievement worth noting. It usually takes up to a month or more to mobilize the necessary tools and resources for a shallow water repair.²⁰

CenturyLink fully restored service on November 15, 2013.²¹ CenturyLink incurred more than \$2 million repairing the underwater fiber optic cable during this outage.²²

9 Since the outage, CenturyLink has obtained and installed two microwave facilities between Friday Harbor (on San Juan Island) and Mt. Constitution and between Mt. Constitution and Bellingham at a cost of more than \$650,000.²³ These digital microwave systems offer redundancy and have sufficient capacity to maintain the Company's intrastate voice and critical services traffic, i.e., 911 and SS7 links, between the islands and the mainland at normal call volumes.²⁴ These facilities act to provide improved diversity and backup for service to San Juan County in addition to serving as a primary path for other Company services.

10 On August 19, 2014, Staff submitted its Investigation Report providing background, and the results of its examination, conclusions, and recommendations regarding the technical, operational, and communications-related circumstances encompassing the outage. Following submission of the Investigation Report, on November 5, 2014, the Staff filed a complaint with four causes of action against the Company, alleging:

- Three violations of WAC 480-120-412(2)²⁵ for CenturyLink's failure to notify the Commission directly of a major outage for each day the Company failed to act on November 5, 6, and 7.²⁶

²⁰ Investigation Report at 10-11.

²¹ *Id.* at 11.

²² Joint Testimony, Exh. No. JT-1T at 20:16-17.

²³ Joint Testimony, Exh. No. JT-1T at 20:20-22.

²⁴ Settlement, ¶ 15.

²⁵ WAC 480-120-412(2) provides that "[w]hen a company received notice of or detects a major outage, it must notify the commission and any [public safety answering point] serving the affected area as soon as possible."

²⁶ Investigation Report at 19.

- Ten violations of WAC 480-120-412(3)²⁷ for CenturyLink's failure to provide meaningful periodic updates on the status of the outage for its duration to county and state emergency agencies from November 5 through November 15.²⁸
- One violation of WAC 480-120-412(5)²⁹ for the Company's failure to implement procedures specific to this outage to disseminate information to the public and public officials.³⁰
- Violations of WAC 480-120-412(5) totaling 15,921 for CenturyLink's failure to communicate adequately with its customers during the outage.³¹

Staff's over-all allegations encompass 15,935 violations of WAC 480-120-412, the Major Outages rule, reflecting a combined total recommended penalty of up to \$173,210.³²

11 On June 2, 2015, the Company, Staff, and Public Counsel filed a full Settlement Agreement (Settlement) resolving all issues raised in the Complaint. On June 26, 2015, the parties filed a revised Settlement, which is attached to, and adopted by reference into this Order as Appendix A, and joint testimony in support of the Settlement. Subsequent to the revised Settlement, the Commission issued a bench request on August 11, 2015, seeking information on the length of spectrum licenses granted by the Federal Communications Commission and the Canadian authorities to CenturyLink for its two

²⁷ Pursuant to WAC 480-120-412(3), CenturyLink must notify the county E911 coordinator and the state emergency management authorities when a major outage affects any emergency response facility, and provide periodic updates on the status of the outage. Further, the regulation requires that "[t]he company must coordinate service restoration with the state emergency management authorities if it requests it, and, if requested to do so by the commission, report daily to it the progress of restoration efforts until the company achieves full network recovery."

²⁸ Investigation Report at 20.

²⁹ WAC 480-120-412(5) provides:

Unless heightened security concerns exist, during major outage recovery efforts all companies must implement procedures to disseminate information to the public, public officials, and news media. All companies must provide a statement about the major outage that includes the time, the cause, the general location and approximate number of affected access lines, and the anticipated duration.

³⁰ Complaint, ¶ 20.

³¹ Investigation Report at 21.

³² Complaint, ¶ 26 and Investigation Report at 22.

microwave systems and whether the systems have sufficient capacity for the Company's broadband services in San Juan County.

- 12 The Commission convened a settlement hearing on August 27, 2015. The settlement panel witnesses were: Rayne Pearson and Bob Williamson on behalf of Staff, Stefanie Johnson on behalf of Public Counsel, and Mark Reynolds on behalf of CenturyLink.

II. Settlement Terms and Supporting Testimony

- 13 The Settlement consists of several major provisions governing alleged violations and penalties, development and implementation of communications plans for San Juan County and statewide, prospective technical and maintenance practices, and improvements to problematic service areas in other Washington locations. CenturyLink, Staff, and Public Counsel all agree that the Settlement fully resolves the issues raised in the Commission's complaint, and that the filing is in the public interest and should be accepted by the Commission. Each major provision of the Settlement is summarized below.
- 14 First, CenturyLink admits to notification violations of WAC 480-120-412, and the Company agrees to pay a penalty of \$50,000.³³ Although CenturyLink disputes some of the contentions of Staff's Investigation Report and the allegations set forth in the complaint, the Company concedes to some of the assertions and specifically accepts the terms of the agreement as a fair resolution of the outstanding issues.³⁴ Public Counsel supports the Company facing a monetary penalty for its alleged communications failures.³⁵ It maintains that the \$50,000 penalty, combined with the additional expense of repairs within six designated, rural areas (described below), at a total of approximately \$100,000, "is a reasonable compromise."³⁶
- 15 The parties to the Settlement point out that the penalty is in addition to the \$2 million in repair costs the Company has already incurred to repair the submarine fiber optic cable, over \$650,000 expended to obtain and install the microwave facilities, and \$271,487 in

³³ Settlement, ¶¶ 11 and 12. Staff originally recommended a penalty of up to \$173,210. Investigation Report at 22.

³⁴ Joint Testimony, Exh. No. JT-1T at 20:8-9.

³⁵ Joint Testimony, Exh. No. JT-1T at 26:15-16.

³⁶ *Id.*, at 26:16-20.

customer credits provided to subscribers in the San Juan Islands.³⁷ Public Counsel indicated that the amount of \$271,487 in credits provided to customers was more than twice the \$111,925 CenturyLink was required to credit to customers.³⁸

16 Second, the Settlement establishes a framework for development and implementation of two Emergency Communications Plans, one to address San Juan County and the other to address the entire state.³⁹ For the San Juan County emergency communications plan, the Company commits to meet with Staff and Public Counsel, as well as any representatives of the County DEM and the Washington Military Department that wish to attend, to formulate an emergency communications plan for San Juan County that is responsive to the requirements in WAC 480-120-412.⁴⁰ The Settlement provides for one meeting to take place in San Juan County within six months of this Order's effective date, with Staff initiating, coordinating, and facilitating the meetings.⁴¹ The Company agrees to produce an emergency communications plan for San Juan County within eight months after this Order's effective date.⁴² Public Counsel lauded this development, stating that "[t]his new county-specific plan should address the shortcomings of CenturyLink's communications with the San Juan County 911 coordinator in future outages."⁴³

17 Similarly, CenturyLink commits to working with Staff and Public Counsel to develop a statewide emergency communications plan to address any future Washington outages consistent with WAC 480-120-412.⁴⁴ The Settlement provides for one meeting to take place at the Commission's headquarters in Olympia within six months of this Order's effective date, with Staff initiating, coordinating, and facilitating the meetings.⁴⁵ The

³⁷ *Id.*, at 20:16-21:4.

³⁸ *Id.*, at 27:6-7 and n.4. Public Counsel asserts that the Company was only required to credit customers for the ten days of lost local exchange services, while CenturyLink customers actually received credits for fifteen days for all services impacted, not just local exchange services. *Id.*

³⁹ Collectively the Washington State Emergency Communications Plan and the San Juan County Emergency Communications Plan will be referred to in this Order as the Emergency Communications Plans.

⁴⁰ Settlement, ¶ 13.

⁴¹ *Id.*

⁴² *Id.*

⁴³ Joint Testimony, Exh. No. JT-1T at 25:17-19.

⁴⁴ Settlement, ¶ 14.

⁴⁵ *Id.*

Company agrees to produce an emergency communications plan for Washington within eight months of this Order's effective date.⁴⁶ Staff argues that having a statewide plan "should ensure that information is more quickly and widely disseminated to CenturyLink customers in the event of an outage."⁴⁷ Public Counsel asserts "that information from CenturyLink to its customers and public officials [should] be swift, efficient, and effective."⁴⁸

18 The third provision of the Settlement pertains to precautionary measures to be implemented to reduce the potential for future submarine fiber optic system failures. Specifically, by virtue of a series of mandatory inspection and reporting obligations, CenturyLink is required to submit annual inspection plans for the San Juan Submarine Facilities to the Commission, by November 30 of each year, reporting with specificity on its exact plans for conducting inspections of the submarine fiber optic system for the subsequent calendar year.⁴⁹ The inspection plans will contain the locations of the facilities to be inspected and the precise frequency and manner in which the inspections will be conducted.⁵⁰ Subsequent to each year's inspections, the Company agrees to report by March 31 of the following year, the results of all inspections and maintenance performed during the preceding calendar year for both underwater fiber cable and the microwave systems.⁵¹ As to the underwater fiber cable inspections, CenturyLink's report will:

- Identify the baseline measurements of decibel and signal strength;
- Identify any loss of decibel or signal strength; and
- Describe ongoing monitoring for each underwater facility.

⁴⁶ *Id.*

⁴⁷ Joint Testimony, Exh. No. JT-1T at 13:4-6.

⁴⁸ *Id.*, at 26:10-11.

⁴⁹ Settlement, ¶ 16(1). The term "San Juan Submarine Facilities" is defined within the Settlement and includes sections of the cable running from Friday Harbor on San Juan Island to Lopez Island, from Lopez Island to Anacortes on the mainland, and from Blakely Island to Orcas Island. Joint Testimony, Exh. No. JT-1T at 7:11-14.

⁵⁰ Settlement, ¶ 16(1).

⁵¹ *Id.*, ¶ 16(2).

- 19 For the microwave systems inspections and maintenance reports, CenturyLink will state whether it followed its current Antenna and Tower Routine Inspection.⁵² Further, if the Company makes changes to its Antenna and Tower Routine Inspection, CenturyLink will provide a copy of the new document to the Commission on or before March 31 of each year.⁵³ All of the inspection and reporting commitments will continue in full force and effect through March 31, 2025.⁵⁴
- 20 CenturyLink will report to the Commission, by March 31 of each year, the ability of both microwave systems to provide redundant capacity between the various island customers to the host switch in Friday Harbor and the redundant capacity between Friday Harbor and Bellingham, Washington.⁵⁵ The Company will also affirm that the microwave systems have sufficient capacity to maintain CenturyLink's intrastate voice and critical services traffic on a diverse route between the islands and the mainland at normal call volumes.⁵⁶ CenturyLink agrees to petition the Commission for approval of any plan to reduce or eliminate the redundant service between the islands and from the islands to the mainland.⁵⁷ The Settlement ensures the Company will maintain the microwave redundancies over the next ten years.⁵⁸ As Staff states, the various reporting requirements contained within the Settlement "ensure reasonable inspections and monitoring, which mitigates the possibility of another total failure of telecommunications in the San Juan Islands."⁵⁹
- 21 The final major provision of the Settlement pertains to commitments by CenturyLink to improve facilities in a number of areas of Washington, other than San Juan County, that are reported to suffer from recurring service and maintenance difficulties. Specifically, the Company commits to replace the facilities in six counties in an effort to improve

⁵² *Id.*

⁵³ *Id.*

⁵⁴ Joint Testimony, Exh. No. JT-1T at 9:4.

⁵⁵ Settlement, ¶ 16(3).

⁵⁶ *Id.* The Company agrees to provide information to Staff regarding the microwave systems' status on request.

⁵⁷ *Id.*, ¶ 16(4)

⁵⁸ Joint Testimony, Exh. No. JT-1T at 18:2-3. Settlement, ¶ 16(4) provides: "CenturyLink will petition the Commission for approval of any company plans to reduce or eliminate redundant service between the islands and from the islands to the mainland."

⁵⁹ Joint Testimony, Exh. No. JT-1T at 19:1-2.

service quality.⁶⁰ Staff identified the locations for the facility replacement based on consumer complaints in Enumclaw, King County; Colville, Stevens County; Tacoma, Pierce County; Keller, Ferry County; Longview, Cowlitz County; and Walla Walla, Walla Walla County.⁶¹ Pursuant to this provision of the Settlement, CenturyLink agrees to complete the work by December 31, 2015, and the Company will notify the Commission upon completion.⁶²

- 22 Staff urges the Commission to approve the Settlement, stating that CenturyLink “has committed to making improvements not only to its infrastructure, but also to its internal processes and procedures.”⁶³ Staff also contends that the Settlement results in service quality improvements in rural areas of Washington that the Company otherwise would not have made.⁶⁴

III. Commission Determination

- 23 We fully recognize that modern telecommunications and broadband services are essential contributions to effective social welfare and the lifeblood of efficient economies. These services negate and eliminate the effect of time and space between people, communities, and businesses by facilitating essential and efficient interactions. Telecommunications and broadband-based network services also enable remote healthcare, distance education, and access to financial capital and the arts to the point where less urban areas such as San Juan County are more attractive now, than ever before, as a place to live and conduct business.

- 24 The importance of telecommunications and broadband to the communities of San Juan County, long defined by their distance and isolation from more urban areas of Washington, is exemplified by the need for complete and unmitigated access to connectivity and information. Indeed, our record is replete with comment from consumers and businesses in San Juan County that underwent tremendous hardship

⁶⁰ Settlement, ¶ 17.

⁶¹ *Id.*

⁶² *Id.*, ¶ 18.

⁶³ Joint Testimony, Exh. No. JT-1T at 13:21-23.

⁶⁴ *Id.* at 14:1-2. Staff notes that the six locations were selected based on residential complaints received by the Commission. *Id.* at 14:14-15.

during the pendency of the outage. We heard firsthand about the absence of telephone, computers, internet, mobile phones, and other communications means that produced enormous adversity to the community.⁶⁵ The distress expressed by government, public safety, businesses and consumers demonstrated the absolute necessity of uninterrupted access to robust technology and communications capability. Our record clearly demonstrates that a lack of access to such connectivity, whether of short or extended duration, can have a direct and severe impact on such communities such that they run the risk of being marginalized.

25 It is against this backdrop that we weigh the implications of the outage against the proposed Settlement's terms. We must exercise our judgment in assessing the proposed financial, operational, and technical provisions of the agreement as remedies or conditions necessary to reasonably prevent a recurrence of an outage of this scope and magnitude in the San Juan Islands. Accordingly, our evaluation must "determine whether a proposed settlement meets all pertinent legal and policy standards."⁶⁶ Settlements may be approved "when doing so is lawful, when the settlement terms are supported by an appropriate record, and when the result is consistent with the public interest in light of all the information available to the [C]ommission."⁶⁷

⁶⁵ We note that a number of comments by individuals and businesses point to the impact of the outage on services purchased by such consumers from other service providers such as unaffiliated cellphone and internet service providers. To the extent those other providers utilized CenturyLink's wholesale services, in part, as a means to provide their own retail telecommunications or broadband services, these carriers and their customers were also impaired to some degree. However, we also note that other carrier's decisions to utilize CenturyLink's wholesale service arrangements are done so by their own choice including the risk that the services may experience outages from time to time. The Commission specifically points out that unaffiliated carriers bear their own responsibility to construct, maintain, or procure network facilities or services used in the provision of their retail service offerings to consumers, including those consumers in San Juan County. Ultimately it is their responsibility, not CenturyLink's, to ensure the reliability and redundancy of their own network arrangements necessary for the provision of their retail service offerings. Despite the additional network arrangements CenturyLink undertook to improve reliability and redundancy pursuant to the Settlement, we assume and strongly encourage each unaffiliated service provider to undertake their own assessment of their own network vulnerabilities and make all necessary changes to reduce or eliminate the effects of future outages should they arise.

⁶⁶ WAC 480-07-740.

⁶⁷ WAC 480-07-750(1).

26 Specifically, the Commission must reach one of three possible results:

- Accept the proposed settlement without condition.
- Accept the proposed settlement subject to one or more conditions.
- Reject the proposed settlement.⁶⁸

27 The Commission often encourages the parties to narrow the issues in an adjudication and has favored settlement agreements in past cases. Here, the parties have arrived at a settlement that addresses the inadequacies of some aspects of the Company's response to the outage, proposed measures intended to reduce or eliminate prospects for a recurrence of an outage of this scope and magnitude, and acknowledged deployment of new transmission facilities intended to improve reliability and redundancy, among several other provisions. We acknowledge that the parties have worked diligently to reach agreement on a range of measures and accept, subject to the discussion and modifications set forth below, the Settlement as a reasonable and appropriate resolution of this proceeding.

28 We approve, without modification, Sections B (Violations), F (Technical Agreements), and G (Service Quality Repairs) of the Settlement which pertain to CenturyLink's admissions of violations of Commission rules, the technical agreements, and service quality repairs, respectively. We modify Sections C (Penalty), D (Emergency Communications Plan for San Juan County, and E (Washington Communications Plan). Our modifications are discussed below.

29 We believe the Settlement provisions regarding the penalty amount and the communications plans are, when taken together, insufficient to address the full impact the outage and lack of information about the outage had on thousands of residential and commercial customers who lost telecommunications services for up to ten days. During the outage, residential customers were, in varying degree, without access to telephone, internet, and even basic 911 emergency services for extended and varying lengths of time. We also note that commercial customers lost valuable business calls from patrons. An overriding theme of the public input during this proceeding was the perceived, even demonstrated, inadequacy and insufficient ability of the Company to effectively convey to consumers, government and public safety officials, and the media about specific aspects of the outage. Simply stated, the public expressed sustained indignation that

⁶⁸ WAC 480-07-750(2).

CenturyLink was slow to respond in efforts to inform consumers, media, and governmental entities about various aspects of the outage, including the scope of its effect, expected duration, or restoration efforts. We acknowledge that CenturyLink believes its communications efforts were more earnest and well-intentioned than perceived by the public and others, and accept its assurances that the Company has already implemented improved processes to ameliorate such criticisms in the future by virtue of its own internal actions that will complement the Settlement's provisions relating to the establishment of Emergency Communications Plans. Nevertheless, we are concerned that too much time has elapsed, nearly two years, since the outage occurred and are bothered by the additional eight month timeframe allowed for submission and implementation of appropriate plans which may be necessary in the event of future outages. We are also concerned with the lack of detail regarding such plans and the process, if any, the parties intend for appropriate vetting and approval of the plans by the Commission.

30 We find Sections D and E are rather vague with respect to the process and timeframes the parties envision for development and approval of the Emergency Communications Plans. We reduce from eight to three months the timeframe set forth in Sections D and E for the development and submission of acceptable Emergency Communications Plans. Absent this modification, the Emergency Communications Plans would likely not be approved until nearly three years after the outage. When questioned at hearing, the parties were unable to articulate why the eight month time frame was selected and CenturyLink's witness conceded that the plans could be drafted and submitted within a shorter time frame.⁶⁹ We direct the settling parties to file the fully-developed Emergency Communications Plans discussed in Sections D and E of the Settlement within three months of the effective date of this Order. This docket shall remain open for receipt of

⁶⁹ Commissioner Jones: (...) "So how did you come up with eight months instead of two, three, four months?"

Ms. Pearson: Actually, I'm going to defer to Mr. Reynolds on this one.

Commissioner Jones: Mr. Reynolds?

Mr. Reynolds: Stretching my memory here. I think it was a negotiated time frame. To the extent that, you know, we want to work with Staff on a sooner meeting, I don't think we are opposed to that. It's the numbers that came out in the settlement negotiations, so I don't think there is anything magical about it.

the plans, which will be discussed and either approved or rejected at a Commission open meeting.

- 31 Due to the lack of clarity and nebulosity of the exact process and roles that the parties envisioned in the development of the communications plans, we also modify Sections D and E to require the parties to submit, contemporaneously with the filing of the Emergency Communications Plans, a reasonably detailed register of all meetings, calls, and other ancillary steps taken to develop such plans. The filings should include dates, times, locations, and the identity and titles of all individuals involved with specific actions or events associated with the development of each plan. The Commission intends to review and assess the adequacy of the parties' efforts to develop and implement sufficiently robust Emergency Communications Plans.
- 32 We also modify Section E of the Settlement to require the Company and other parties to ensure that the Washington Military Department is consulted with or otherwise included in the meetings and other efforts that will take place in formulating the Washington State Communications Plan. Section D of the Settlement provides for inclusion of the Washington Military Department for the development of the San Juan County emergency communications plan, but for some, unexplained reason, not for the statewide plan set forth in Section E. We are confused by this oversight. Accordingly, we direct the parties to extend an invitation to the Washington Military Department to participate in meetings and drafting of the statewide plan.
- 33 Finally, the Commission modifies Section C of the Settlement pertaining to the penalty amount for CenturyLink's violation of Commission rules. Specifically, the Commission imposes the full fine of \$173,210 originally recommended by Staff but suspends all but \$50,000. We acknowledge the Company has spent over \$2 million to repair the submarine fiber cable break and invested another \$650,000 to obtain and install redundant microwave systems to provide a backup communications route should the San Juan Island connections again become imperiled. CenturyLink has also provided credits in the amount of \$241,487 to its affected customers above and beyond what might be normally provided for a ten-day outage. Finally, we also recognize that the Company has committed to installing new facilities in six rural areas of the state at an estimated cost of approximately \$100,000. Thus, prior to assessment of any penalty, the Company has and will incur nearly \$3 million in new investments and customer credits as a consequence of its own efforts and certain provisions of the Settlement.

34 Because of the Company's combined outlay to resolve the outage quickly and make investments in redundant systems to ensure more reliable service, the Commission is willing to suspend application of the full penalty resulting in a reduction to \$50,000. The remainder of the penalty amount, \$123,210, is suspended for a one year period following Commission review and approval of the Emergency Communications Plans. The suspended amount will be waived in full if, at the end of the one year period following Commission approval of the Emergency Communications Plans, CenturyLink has complied with WAC 480-120-412 and all details of the plans. In the alternative, should the Commission determine during the one year suspension period that the Company has violated WAC 480-120-412 or any provision of the approved Emergency Communications Plans, the suspension may be lifted, thereby subjecting CenturyLink to full imposition of the remaining penalty amount.

35 We find that the Settlement as conditioned above is lawful, supported by the evidentiary record, and in the public interest. We accept and approve the Settlement as conditioned in paragraphs 30 through 34.

FINDINGS OF FACT

36 Having discussed above in detail the evidence received in this proceeding concerning all material matters, and having stated findings and conclusions upon issues in dispute among the parties and the reasons therefore, the Commission now makes and enters the following summary of those facts, incorporating by reference pertinent portions of the preceding detailed findings:

- 37 (1) The Washington Utilities and Transportation Commission is an agency of the State of Washington, vested by statute with authority to regulate rates, rules, regulations, practices, and accounts of public service companies, including telecommunications companies.
- 38 (2) CenturyLink provides telecommunications services including, but not limited to, basic local exchange service to the public for compensation within the state of Washington.
- 39 (3) On November 5, 2013, CenturyLink customers on the San Juan Islands experienced a loss of toll calls, data communications, and local calls due to a break in an underwater fiber cable connecting Lopez Island with the main switch

on San Juan Island. The outage affected 15,921 access lines, and CenturyLink fully restored service on November 15, 2013.

- 40 (4) Staff brought a complaint against CenturyLink on November 5, 2014, alleging 15,935 violations of WAC 480-120-412, the Major Outages rule, and recommending a penalty of up to \$173,210.
- 41 (5) On June 2, 2015, the Company, Staff, and Public Counsel filed a full Settlement Agreement (Settlement). On June 26, 2015, the parties filed a revised Settlement which is attached to, and adopted by reference into this Order, and supporting Joint Testimony.
- 42 (6) The Settlement provides for, among others, (1) CenturyLink's admission of violations of WAC 480-120-412 in connection with the San Juan Islands major outage and agreeing to pay a penalty of \$50,000; (2) the development of a San Juan County Emergency Communication Plan within eight months from the effective date of this Order; (3) the development of a Washington State Emergency Communications Plan, in collaboration with Staff and Public Counsel, within eight months from the effective date of this Order; (4) annual inspection and maintenance plans submitted to the Commission for the San Juan Submarine Facilities, the underwater cable, and microwave facilities; (5) CenturyLink agrees to petition the Commission for approval of any plans to reduce or eliminate redundant services between the islands and between the islands and the mainland; and (6) facility replacements in six counties around the state, to be completed by December 31, 2015.
- 43 (7) The Commission convened a settlement hearing on August 27, 2015.

CONCLUSIONS OF LAW

- 44 Having discussed above all matters material to this decision, and having stated detailed findings, conclusions, and the reasons therefore, the Commission now makes the following summary conclusions of law, incorporating by reference pertinent portions of the preceding detailed conclusions:
- 45 (1) The Washington Utilities and Transportation Commission has jurisdiction over the subject matter of, and parties to, these proceedings.

- 46 (2) The Commission will approve a settlement that is lawful, supported by the evidentiary record, and in the public interest. The Commission may approve a settlement, approve with conditions, or reject a settlement.
- 47 (3) The Commission concludes that the Washington Military Department should be fully included in all meetings and discussions regarding the Washington State emergency communications plan.
- 48 (4) Contemporaneously with the filing of the Emergency Communications Plans, the parties shall submit a document which provides a sufficiently detailed account of the meetings, calls, and other efforts undertaken by the parties to develop each plan.
- 49 (5) While the Settlement provides the parties with eight months to draft two Emergency Communications Plans, the evidentiary record does not support this lengthy delay. The Company stated it is not opposed to working with Staff on a quicker time frame. The Commission concludes that the parties should file the Emergency Communications Plans with the Commission within three months of the effective date of this Order.
- 50 (6) The Commission will approve or reject the Emergency Communications Plans at an open meeting.
- 51 (7) Based on CenturyLink's investment to-date, the Commission concludes that the public interest is best served by imposing the original penalty of \$173,210 in full and suspending all but \$50,000 of the penalty for one year following the Commission's approval of the Emergency Communications Plans. The suspended amount will be waived completely if, during this one year period, CenturyLink complies with WAC 480-120-412 and the details of the approved Emergency Communications Plans. Should the Commission determine, during this one year suspension, that the Company has again violated WAC 480-120-412 or the provisions of the approved emergency communications plan, the suspension will be lifted, and the Commission will impose the remaining \$123,210.

ORDER

THE COMMISSION ORDERS THAT:

- 52 (1) The revised Settlement Agreement, which is attached to, and adopted by reference into this Order, and entered into by CenturyTel of Inter Island, Inc. d/b/a CenturyLink (CenturyLink), the Commission's regulatory staff (Staff), and the Public Counsel Section of the Washington Office of the Attorney General (Public Counsel), is accepted and adopted with the conditions set forth in paragraphs 30 through 34 above.
- 53 (2) CenturyLink, Staff, and Public Counsel will file the San Juan County Emergency Communications Plan and the Washington State Emergency Communications Plan in this docket within three months of the effective date of this Order. At this same time, CenturyLink will file a reasonably detailed register of all meetings, calls, and other ancillary steps taken to develop such plans.
- 54 (3) CenturyLink is assessed a penalty in the amount of \$173,210, and the Company shall remit \$50,000 of the penalty to the Commission within thirty days of the effective date of this Order.
- 55 (4) The remaining \$123,210 penalty will be suspended for one year following the Commission's approval of both Emergency Communications Plans. If, during that annum, the Commission has not found CenturyLink to have violated either WAC 480-120-412 or the details of the emergency communications plan, the \$123,210 will be waived. Conversely, if the Commission finds the Company has violated WAC 480-120-412 or the details of the emergency communications plan during the year following Commission approval of the Emergency Communications Plans, the Commission will impose the remaining \$123,210 penalty.

- 56 (5) The Commission retains jurisdiction to effectuate the terms of this Final Order.

Dated at Olympia, Washington, and effective October 20, 2015.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

DAVID W. DANNER, Chairman

PHILIP B. JONES, Commissioner

ANN E. RENDAHL, Commissioner

NOTICE TO PARTIES: This is a final order of the Commission. Any stipulating party may within 10 days reject the condition(s) proposed in this order, pursuant to WAC 480-07-750(2), in which case this order will become void and the matter set for hearing. If this order is not voided by rejection of the condition(s), judicial review may be available. Administrative relief from the terms of this order may be available through a petition for reconsideration, filed within 10 days of the service of this order pursuant to RCW 34.05.470 and WAC 480-07-850, or a petition for rehearing pursuant to RCW 80.04.200 or RCW 81.04.200 and WAC 480-07-870.

ATTACHMENT C

[Service date November 17, 2015]

BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND)	
TRANSPORTATION COMMISSION,)	DOCKET UT-132234
)	
Complainant,)	
)	ORDER 04
)	
v.)	
)	
)	ORDER GRANTING
CENTURYTEL OF INTER ISLAND,)	PETITION TO CLARIFY
INC. D/B/A CENTURYLINK,)	FINAL ORDER
)	
Respondent.)	
.....)	

MEMORANDUM

1 **PROCEEDING:** The Commission entered Order 03 in these proceedings on October 20, 2015, fully resolving the issues in Docket UT-132234. Order 03, among other things, assessed the full original penalty of \$173,210 against CenturyTel of Inter Island, Inc. d/b/a CenturyLink (CenturyLink or the Company) and suspended all but \$50,000 for one year following the Commission’s approval of the Emergency Communications Plans.¹ The Commission would waive the suspended penalty, \$123,210, after this one year period if CenturyLink was not found to have violated WAC 480-120-412 or the provisions of either Emergency Communications Plan during the time.

¹ CenturyLink, the Commission’s regulatory staff (Staff), and the Public Counsel Section of the Washington Office of the Attorney General (Public Counsel) filed a full settlement stipulation (Settlement) with the Commission on June 2, 2015. The Settlement established a framework for development and implementation of two Emergency Communications Plans, one to address San Juan County and the other to address the entire state. Collectively the Washington State Emergency Communications Plan and the San Juan County Emergency Communications Plan will be referred to in this Order as the Emergency Communications Plans.

- 2 **MOTION:** On October 30, 2015, CenturyLink filed a Petition for Clarification of Order 03. Specifically, CenturyLink notes a potential ambiguity in paragraphs 51 and 55, the latter of which reads:

The remaining \$123,210 penalty will be suspended for one year following the Commission's approval of both Emergency Communications Plans. If, during that annum, the Commission has not found CenturyLink to have violated either WAC 480-120-412 or the details of the emergency communications plan, the \$123,210 will be waived. Conversely, if the Commission finds the Company has violated WAC 480-120-412 or the details of the emergency communications plan during the year following Commission approval of the Emergency Communications Plans, the Commission will impose the remaining \$123,210 penalty.²

- 3 The Company seeks confirmation of its interpretation of Order 03 that the suspended penalty amount will be triggered only based on when that violation actually occurred, not on the timing of a Commission finding of a violation. CenturyLink contends that the suspended penalty provision is meant to apply only to violations that might occur after the submission of the Emergency Communications Plans, and not to violations that may be found during the upcoming year based on prior conduct such as the recent settlement agreement filed in Docket UT-140597, which pertains to a separate matter.
- 4 CenturyLink suggests that it was not the Commission's intent to automatically impose the suspended penalty in this proceeding based on pending matters in other proceedings at the time Order 03 was adopted. Instead, CenturyLink contends that the Commission's true intent in adopting the suspended penalty provision of Order 03 was to deter future violations and encourage compliance with WAC 480-120-412 and the Emergency Communications Plans. CenturyLink thus seeks clarification that paragraphs 51 and 55 of Order 03 will operate only prospectively.
- 5 **COMMISSION DETERMINATION:** We agree with CenturyLink's interpretation of Order 03. When the Commission imposed the potential application of the suspended penalty in this proceeding, it did so as a means to encourage compliance with our major outage rules prospectively and subsequent to adoption of the emergency communications

² Both paragraph 51 and paragraph 55 impose the same condition upon the Commission's approval of the Settlement, albeit with slightly different language.

plans to be developed and implemented in this proceeding. The Commission's decision to impose the condition did not include or encompass other potential violations of rules that were pending, under consideration, or had already been agreed to by the Company in other Commission proceedings. Accordingly, we approve CenturyLink's Petition for Clarification.

ORDER

THE COMMISSION ORDERS THAT:

- 6 (1) The Petition for Clarification filed by CenturyTel of Inter Island, Inc. d/b/a CenturyLink on October 30, 2015, is granted.
- 7 (2) The Commission retains jurisdiction to effectuate the terms of this Order.

Dated at Olympia, Washington, and effective November 17, 2015.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

DAVID W. DANNER, Chairman

PHILIP B. JONES, Commissioner

ANN E. RENDAHL, Commissioner

ATTACHMENT D

ATTACHMENT A

SECOND REVISED

Washington State Outage Communications Plan of CenturyLink

INTRODUCTION

In accordance with the approved Settlement in the case, CenturyLink met with representatives from Commission Staff and Public Counsel to develop an emergency communications plan for use during major outages in Washington State consistent with the requirements of WAC 480-120-412.

WAC 480-120-412 regulates the actions of companies subject to the Commission's jurisdiction during Major Outages as that term is defined in WAC 480-120-021.

This document serves as CenturyLink's statewide communications plan for use by CenturyLink personnel during major outages in Washington ("Statewide Outage Communications Plan" or "SOCP"). The SOCP also provides the Commission, emergency management officials and the public an understanding of the communications to expect from CenturyLink in the event of a major outage of telephone service. The procedures set forth in the SOCP are intended to explain CenturyLink's communications procedures but are not intended to limit CenturyLink's ability or prerogative to communicate with the Commission, emergency management officials and/or the public in other ways and at other times not specified in the SOCP. These procedures are in addition to standard outage reporting procedures involving the Washington State Military Department.

GOAL/OBJECTIVE

The goal of the SOCP is for CenturyLink to make information about a major outage of telephone service in Washington available to the people who need to know that is as timely and accurate as reasonably possible so that they can plan for and adapt to the effects of the outage.

DEFINITIONS

"**Communicator**" is an organization within CenturyLink that is tasked with communicating pertinent information about a major outage to one or more target audiences. This SOCP identifies the following CenturyLink organizations as communicators:

1. **Community Relations & External Communications resides in CenturyLink's Brand Management, Corporate Communications & Investor Relations organization and is responsible for external communications through conventional and social media.**

2. **Network Events Management Center (NEMC)** resides in CenturyLink's Public Safety Services and NEMC organization and serves all states where CenturyLink provides telephone service.

The NEMC e-mails the Washington Utilities and Transportation Commission, the State E911 Coordinator's Office of the Emergency Management Division of the Washington Military Department **PUC reports** of major outages that contain the following pertinent information, as and when available:

Report Number
Impacted Company
Date and Time
Time Zone
For Questions Contact
Reason for Outage Notification
Cause of Outage
Location of Outage
Exchange Name / Wire Center
Expected Duration
Actual Duration
Number of Customers/ Cable pair impacted
Services Affected
Agencies Notified
Significant Update
Resolution
Restore Date/Time

3. **9-1-1 Network and Center Operations** residing in CenturyLink's Public Safety Services (PSS) organization. The 9-1-1- Network and Center Operations is responsible for, among other things, telephone service outage notifications to the State E911 Coordinator's Office of the Emergency Management Division of the Washington Military Department and Public Service Access Points (PSAPS) in all states where CenturyLink provides telephone service.

"Major outage" has the same definition as in WAC 480-120-021, which is:

1. A service failure lasting for thirty or more minutes that causes the disruption of local exchange or toll services to more than one thousand customers;
2. Total loss of service to a public safety answering point or emergency response agency;

3. Intercompany trunks or toll trunks not meeting service requirements for four hours or more and affecting service; or
4. An intermodal link blockage (no dial tone) in excess of five percent for more than one hour in any switch or remote switch.

“**Target audience**” is an organization or group of people that is interested in, affected by or has a need to know about a major outage. This SOCP defines the following target audiences:

1. The Washington Utilities and Transportation Commission;
2. State E911 Coordinator’s Office of the Emergency Management Division of the Washington Military Department;
3. Public Service Access Points (PSAPs);
4. The general public, including CenturyLink telephone service customers who are out of service.

COMMUNICATIONS PROCEDURES BY TARGET AUDIENCE

1. Washington Utilities and Transportation Commission.

CenturyLink communicates available pertinent information about major outages to the WUTC by e-mail distribution of PUC Reports issued by the NEMC. The NEMC updates the reports frequently until the outage is resolved.

2. State E911 Coordinator’s Office of the Emergency Management Division of the Washington Military Department.

CenturyLink communicates available pertinent information about major outages to the State E911 Coordinator’s Office by e-mail distribution of PUC Reports issued by the NEMC. The NEMC updates the reports frequently until the outage is resolved.

3. Public Service Access Points (PSAPs).

In compliance with federal regulations, CenturyLink communicates available pertinent telephone service outage information to potentially affected PSAPs by e-mail notification and, when possible, contact by telephone.

Although communication with PSAPS is governed by federal regulations that establish protocols and requirements for outage notification to PSAPs nationwide, CenturyLink will modify its outage notification system so that it provides e-mail notification to PSAPs of major outages as defined in WAC 480-120-021. The system will identify major

outages by Common Language Location Identifier (CLLI) code¹ and notify all PSAPs served in that CLLI of a major outage in the CLLI. CenturyLink anticipates completing the modification by June 30, 2016.

4. The general public including CenturyLink telephone service customers who are out of service.

CenturyLink does and will communicate information about prolonged and widespread telephone service outages to the public through use of conventional media, social media and monitor media targeted to affected communities to the extent possible and as warranted. Examples of the targeted communications are provided in Appendix A.

Conventional media outlets include:

- Radio stations
- Television stations
- Newspapers
- Local Media (blogs, etc)

Social Media outlets include:

- Facebook (geo-targeted to the state)
- Twitter (geo-targeted to the state)

In addition CenturyLink maintains a website called “Service Troubleshooter” that provides residential telephone service customers information about their particular telephone service. Customers who access the website and input their account or billing telephone number and ZIP code can find out if their telephone service is out and if a repair ticket for the service is open. They may also opt into a notification by their choice of text, e-mail or telephone call to a telephone number of their choosing when service is restored.

In the event of a prolonged major outage, defined as a Major Outage lasting more than 72 hours, CenturyLink can establish a special website that provides information about the outage to its customers and the public. Known as a Dark Site, this website is able to provide:

¹ CLLI is a standardized way of describing locations and significant pieces of hardware at those locations. The short eight-character CLLI is broken down as follows: The first four describe the city; the next two are the state, the last two are a specific office in that city and state.

- Any available facts about what happened as part of an opening or initial statement describing the crisis event and the organization's response.
- Any relevant special instructions regarding the outage.
- What steps are being taken to get the situation back to normal.
- Relevant background information describing the organization, the causes, nature and likely impact of the crisis; in short, anything that promotes clear understanding of the situation.
- Contact information for the news media.

In addition to the foregoing, CenturyLink may communicate with communities of interest as conditions warrant through other means, including, but not limited to, e-mail updates, conference calls, or in person meetings with government officials and members of the community. These ad hoc communications occur as and when CenturyLink determines unique circumstances call for additional communication about an outage.

Appendix A

Communications to the public through traditional, social and monitor media

Key Messages

This appendix contains key messages which are the pertinent information that is important to communicate to target audiences. Key messages are the broad overall messages that can be tailored to a specific event.

Communications Timing

Corporate Communications distributes notifications and updates on the specific outage situation to media described in the media distribution below.

The frequency of communications will vary depending on the severity of the outage, but should be delivered at least once every 24 hours throughout the event.

Unplanned Outage

Media Distribution

- **Traditional Media** – updates provided to media in impacted markets and on a reactive basis to other media outlets.
- **Social Media** – updates posted to Facebook and Twitter (Geo targeting impacted areas).
- **Monitor Media** – leverage Hootsuite and #hashtag where applicable.

Traditional media messaging

“CenturyLink technicians continue to work around the clock in (STATE or REGION) to repair residential and business services impacted by (TYPE of OUTAGE – If known)”. *(For weather-related outages, provide situational information including generator use, locations with restored service, locations hardest hit, ETR – if known, phone numbers to call to report outages or to activate Emergency Call Forwarding.)* We apologize for any inconvenience this has created for our customers.”

Facebook post

“CenturyLink technicians continue to work around the clock in (STATE or REGION) to repair residential and business services impacted by (TYPE of OUTAGE – If known). We apologize for any inconvenience this has created for our customers.” *(For weather-related outages, provide situational information including generator use, locations with restored service, locations hardest hit, ETR – if known, phone numbers to call to report outages or to activate Emergency Call Forwarding.)*

Twitter post

“CenturyLink technicians continue to work around the clock in (STATE or REGION) to repair services impacted by (TYPE of OUTAGE – If known).” *Additional posts for weather-related outages could also include: (Situational information including generator use, locations with restored service, locations hardest hit, ETR – if known, phone numbers to call to report outages or to activate Emergency Call Forwarding.)*

Calls to Actions can include

- Advising customers to call the number on their bill and select the “repair” prompt during the automated options. Website for customer inquiry in the case of an outage to be notified by text, email, phone for updates
- Local Emergency Management in the case of 911 impacted (Fire/Police)

Unplanned Post-Event Reactive Response (resolution messaging)

Media Distribution

- **Traditional Media** – updates provided to media in impacted markets and on a reactive basis to other media outlets
- **Social Media** – updates posted to Facebook and Twitter (Geo targeting impacted areas)
- **Monitor Media**- leverage hootsuite and #hashtag where applicable

Traditional Media Messaging

“Due to a (fiber cut/equipment malfunction) on (DATE), CenturyLink customers in (STATE or REGION) may have experienced disruptions to their services. CenturyLink technicians worked quickly to identify and restore impacted services. All services were restored on/by (TIME/DATE). CenturyLink is committed to providing reliable services to its customers and we apologize for any inconvenience this may have caused our customers.”

Facebook post

“Due to a (fiber cut/equipment malfunction) on (DATE), CenturyLink customers in (STATE or REGION) may have experienced disruptions to their services. CenturyLink technicians worked quickly to identify and restore impacted services. All services were restored on/by (TIME/DATE). We apologize for any inconvenience this may have caused our customers.”

Twitter post:

“CenturyLink has restored services in (STATE or REGION) due to a (REASON). We apologize to customers for the inconvenience.”

ATTACHMENT E

From: Regulatory NEMC
Sent: Sunday, November 06, 2016 4:00 AM
To: Regulatory NEMC
Subject: PUC_OR.110616.002_I



PUC Report

Report Number : OR.110616.002
Impacted Company : CenturyLink
Date and Time : 06-NOV-2016 03:06:00
TIMEZONE : PST
For Questions : Phil Grate 206 345 6224
Contact :
Reason for Outage : The Dalles Switch is not processing toll calls.
Notification :
Cause of Outage : Under investigation.
Location of Outage : The DALLES/OR
Exchange Name / : THDLORXADS0
Wire Center :
Expected Duration : 06-NOV-2016 09:00:00
Duration : 00:45:51
Number of
Customers/ Cable : 2666
pair impacted :
Services Affected : TOLL SWITCH ISOLATION
Agencies Notified : PSAP
Significant Update :
Resolution :
Restore Date/Time :

--Disclaimer--

ATTACHMENT F

From: Leneweaver, William A (MIL)
Sent: Sunday, November 6, 2016 8:59 AM
To: MIL DL E911 Outages; 911 Outage Report; Hyett, Vicki; Fritts Jason; Ward Jamie; Klickitat 911; Brad Coughenour (Yakima County); Becky Rasmusson (becky.rasmusson@yakimawa.gov); Doug deGraaf (Benton); Kim Lettrick (Benton) Fuller, Dave (CRESA); Phil Grate; Mark Reynolds; UTC DL Telecom-Outage
Subject: Large Scale Outage - Yakima, Benton, Skamania & Klickitat County plus parts of OR
Importance: High

All,

There appears to be a large scale outage effecting the former Untied Telecom areas of our state - Parts of Yakima and Benton plus all of Skamania and Klickitat Counties. There are also reports of this extending into Oregon.

Both Klickitat and Skamania have had their calls re-routed to Clark and Clark has received at least one call from Hood River, OR.

I have heard only that our CenturyLink Service Manager, Vicki Hyett has received word that Klickitat and Skamania have failed-over to Clark.

COUNTIES LISTED: Please provide any missing detail when you are able. Please let us know if we can help or provide any assistance.

CENTURYLINK: we have not received any notification as required by the agreed-to State-wide Outage Notification Plan. Please remedy this and provide information - scope, initial cause, time to restore, etc.

CENTURYLINK: Vicki, Klickitat reports that 911 remains up. Please verify whether the ESInet trunks are effected or not. In other words, can you "see" the PGMs?

UTC: this appears to meet the criteria of a Major Outage.

SEOO: Thank you, your previous emails have been received. Please continue to monitor this situation.

CLARK: please forward this to your OR contacts.

Andy

William Andrew Leneweaver
Deputy State E911 Coordinator for Enterprise Services
Washington State E911 Coordinator's Office
20 Aviation Drive, Camp Murray, WA 98430-5020

Desk: 253-512-7039



Mobile: 253-302-9214



andy.leneweaver@mil.wa.gov

Professional Entrepreneurial Leadership! Trusted, Decisive, Intuitive & Creative!
SENT THRU mobile.wa.gov OWA

ATTACHMENT G

From: Beaton, Rebecca (UTC)
Sent: Sunday, November 6, 2016 10:38 AM
To: Mark CTL Reynolds; phil. grate
Cc: Vasconi, Mark (UTC); Roth, Jing (UTC)
Subject: Fwd: Large Scale Outage - Yakima, Benton, Skamania & Klickitat County plus parts of OR

UTC staff has received verbal and Email information from WMD but no notice directly from CTL to outage notification contact emails or designated staff. Please update information on this outage and contact the UTC outage email and UTC staff with progress.

Thank you,
Rebecca Beaton
Office 360 664 1286
Mobile 360 464 7236
Email rbeaton@utc.wa.gov

ATTACHMENT H

From: Hyett, Vicki
Sent: Sunday, November 06, 2016 11:20 AM
To: Andy.Leneweaver@mil.wa.gov
Cc: Brad Coughenour (Yakima County); Reynolds, Mark; MIL DL E911 Outages; Doug deGraaf (Benton); Fuller, Dave (CRESA); Klickitat 911; Grate, Phil; Becky Rasmusson (becky.rasmusson@yakimawa.gov); 911 Outage Report; mark.tennyson@mil.state.or.us; Beaton, Rebecca (UTC); Jamie Ward (Klickitat County); Jason Fritz (Skamania County); Kim Lettrick (Benton)
Subject: RE: Large Scale Outage - Yakima, Benton, Skamania & Klickitat County plus parts of OR

All -

I am requesting RFO and why there was lack of notification.

Vicki

Vicki Hyett
Service Manager
Centurylink
206-224-1077 Office
206-930-4100 Mobile
Vicki.Hyett@Centurylink.com

ATTACHMENT I

From: Reynolds, Mark [mailto:Mark.Reynolds3@CenturyLink.com]
Sent: Sunday, November 6, 2016 2:02 PM
To: Thomas, Brian (UTC) <bthomas@utc.wa.gov>
Cc: Grate, Phil <Phil.Grate@CenturyLink.com>; Anderl, Lisa <Lisa.Anderl@CenturyLink.com>; Hyett, Vicki <Vicki.Hyett@CenturyLink.com>
Subject: Outage - Yakima, Benton, Skamania & Klickitat County plus parts of OR

Hi Brian,

Sorry for the delay. I was up in the mountains when we last talked and I wanted to get to a better communications source to find out what was going on. As far as I know we are still working on the problems and it appears to be centered in an OC-192 transport system and a network card in our CTL Wasco central office. We have requested an RFO and are investigating why no formal notification has been sent out. I'm still pursuing and will let you and the others on our distribution list know as soon as we

Mark S. Reynolds
NW Region Vice President - Public Policy
1600 7th Ave., Rm. 1506, Seattle, WA 98191
206-345-1568 (office)
206-478-4825 (cell)

mark.reynolds3@centurylink.com

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ATTACHMENT J

From: Leneweaver, William A (MIL)
Sent: Sunday, November 6, 2016 8:34 PM
To: Jamie Ward; Vicki Hyett; 911 Outage Report; Phil Grate; Mark Reynolds
Cc: Jason Fritz; Tennyson, Mark; MIL DL E911 Outages; Klickitat 911; Fuller, Dave (CRESA); Beaton, Rebecca (UTC)
Subject: Re: Large Scale Outage - Yakima, Benton, Skamania & Klickitat County plus parts of OR

KLICKITAT: Jamie, have you been down all day? 911 and admin? Have you had any comms with CenturyLink? Are your calls failing over to another PSAP?

CENTURYLINK: what's going on here? Any idea of restoration time. We have heard little or nothing!

Andy Leneweaver
Deputy State E911 Coordinator for Enterprise Systems
State E911 Coordinator's Office
Camp Murray, WA 98430
(W) 253-512-7039
(C) 253-302-9214
"Do No Harm!"
Sent from my iPhone

ATTACHMENT K

From: Hyett, Vicki <Vicki.Hyett@CenturyLink.com>
Sent: Sunday, November 6, 2016 9:47 PM
To: Leneweaver, William A (MIL)
Cc: 911 Outage Report; Beaton, Rebecca (UTC); Tennyson, Mark; Reynolds, Mark; MIL DL E911 Outages; Jason Fritz; Fuller, Dave (CRESA); Klickitat 911; Jamie Ward; Grate, Phil
Subject: Re: Large Scale Outage - Yakima, Benton, Skamania & Klickitat County plus parts of OR

All should again be restored. They have had trouble with a shelf and cards in the CO, but believe all is stable now.

Vicki

Vicki Hyett
Service Manager
Centurylink
206-224-1077 Office
206-930-4100 Mobile
Vicki.Hyett@Centurylink.com

ATTACHMENT L

From	Date and Time	To	Subject	Contents	CP
					CP
					CP4
Brown, Carolyn	Mon 11/7/2016 6:05 AM	Garcia, Laura T CC: Atencio, Ted; Grate, Phil; Hyett, Vicki; Reynolds, Mark	FW: Large Scale Outage - Yakima, Benton, Skamania & Klickitat County plus parts of OR	I'm seeing impacts to WA PSAPs with this outage in OR (OR.1:0616.002) – but I don't see a WA PUC outage report – shouldn't there be one? What can Mark and Phil share?	CP4
					CP4

ATTACHMENT M

Paul, Susie (UTC)

From: Regulatory.NEMC@CenturyLink.com
Sent: Monday, November 7, 2016 7:27 AM
To: UTC DL Telecom-Outage
Subject: PUC_OR.110616.002_U



PUC Report

Report Number : OR.110616.002
Impacted Company : CenturyLink
Date and Time : 06-NOV-2016 03:06:00
TIMEZONE : PST
For Questions Contact : Phil Grate 206 345 6224
Reason for Outage Notification : The Dalles Switch is not processing toll calls.
Cause of Outage : TRANSPORT Failure
Location of Outage : THE DALLES/OR, HOOD RIVER/OR, WHITE CITY/OR
Exchange Name / Wire Center : THDLORXADS0
Expected Duration : 07-NOV-2016 10:00:00
Duration : 0028:15:48
Number of Customers/ Cable pair impacted : 7042
Services Affected : DSL,911,FACILITY,TOLL SWITCH ISOLATION
Agencies Notified :
Significant Update :
Resolution :
Restore Date/Time :

--Disclaimer--

ATTACHMENT N

Paul, Susie (UTC)

Subject: CenturyLink Outage - SW WA
Location: 212 (360-664-1358)

Start: Mon 11/7/2016 10:30 AM
End: Mon 11/7/2016 11:00 AM

Recurrence: (none)

Meeting Status: Accepted

Organizer: Beaton, Rebecca (UTC)
Required Attendees: Jing Roth (UTC) (JRoth@utc.wa.gov); Reynolds, Mark; Feeser, Bridgit (UTC); Paul, Susie (UTC); Grate, Phil; Maxwell, Amanda (UTC)

Discuss CenturyLink outage 11-6-16

ATTACHMENT O

From: Hyett, Vicki <Vicki.Hyett@CenturyLink.com>
Sent: Monday, November 7, 2016 9:54 AM
To: 'Jason Fritz'; Leneweaver, William A (MIL); Jamie Ward; 911 Outage Report
Cc: Tennyson, Mark; MIL DL E911 Outages; Klickitat 911; Fuller, Dave (CRESA); Beaton, Rebecca (UTC); Grate, Phil; Reynolds, Mark
Subject: RE: Large Scale Outage - Yakima, Benton, Skamania & Klickitat County plus parts of OR

All -

My apologies on behalf of Centurylink for the lack of detailed information on this continuing outage/issue. We have had a difficult time getting all of the information needed to provide accurate information and status. A fiber terminal out of the Dalles Central Office has been in and out of service for the last 36 hours and is now down hard. The operations folks are working diligently to move all affected services to a new shelf/mux which is taking several hours to accomplish. West reports no misses on 911 calls that were attempted.

I will do a much better job at sending updates today as I receive them.

Thank you,

Vicki

Vicki Hyett
Customer Lifecycle Management Sales Engineer / Service Manager Centurylink
206-224-1077 (Office)
206-930-4100 (Mobile)

ATTACHMENT P

From	Date and Time	To	Subject	Contents	CP
				<p>REDACTED</p>	CP4
Brittany Allen	Nov. 7 3:11 PM	Kerry Zimmer	Request for Statement	<p>Hi, Kerry,</p> <p>I am the news editor at the Goldendale Sentinel in Goldendale, WA and I am contacting you to ask if you might be able to release a statement about the outage that occurred throughout the Columbia River Gorge today. If so, please email me back at this address. I am also available by phone between the hours of 9 p.m. and 5 p.m. if that would be more convenient for you.</p> <p>All the best, Brittany Allen</p> <p>-- Brittany Allen The Goldendale Sentinel, News Editor brittany@goldendalesentinel.com (509) 773-3777</p>	CP5

CP-5 ATTACHMENT A - The Dalles

From	Date and Time	To	Subject	Contents	Q
Kerry Zimmer	Nov. 7 3:14 PM	newstips@thenewtribune.com; newsroom@seattletimes.com; apseattle@ap.org; newstips@nwcn.com; newstips@king5.com; newstips@kirotv.com; tips@komonews4.com; tips@q13fox.com; brittany@goldendalesentinel.com	Subject: CenturyLink Service Outage Media Update 3:15 PM	An equipment issue is impacting 911, voice and long distance services for more than 18,000 customers in Klickitat and Skamania counties in Washington. Services previously impacted in Poulsbo, WA have been restored as of 2:20 this afternoon. 911 in other areas has been re-routed. Technicians are working to restore all services as quickly as possible. In case of an emergency, customers should drive to the nearest fire station or emergency facility. We will provide additional information as it becomes available. We apologize for this inconvenience	Q

Q

ATTACHMENT Q

From: Leneweaver, William A (MIL)
Sent: Monday, November 7, 2016 7:51 AM
To: Fritts Jason; Ward Jamie; Vicki Hyett; 911 Outage Report; Phil Grate; Mark Reynolds; David Simpson; David Furth; Marty.Leavengood@centurylink.com; Scott Mckenzie (CenturyLink); UTC DL Telecom-Outage
Cc: Tennyson, Mark; MIL DL E911 Outages; Klickitat 911; Fuller, Dave (CRESA); Beaton, Rebecca (UTC); Cortez, Dawn (ATG)
Subject: RE: Large Scale Outage - Yakima, Benton, Skamania & Klickitat County plus parts of OR
Importance: High

Quite right you are Jason...this is ridiculous!

CENTURYLINK: the fact that a PSAP's calls have failed over to another PSAP does not obviate the fact that the other PSAP may not be able to do anything constructive with the calls and does not mean you have some "breathing room" in order to fix this issue. Over 24 hours to fix this issue is absolutely unacceptable!

CENTURYLINK: You have failed completely to provide your customers, the PSAPs and the two states information on what has happened and what is being done! You have failed to meet the conditions of the communication plan agreed to by yourselves, the State of Washington and the WUTC. You have placed lives in danger!

CENTURYLINK: Immediately provide to all concerned a write-up of EXACTLY what the problem is, EXACTLY who/what is being effected, EXACTLY what is being done to correct the problem, and an estimate of when this will be resolved!

I have included the full UTC Telecom Outage email address, plus the Director and Deputy Director of the FCC Public Safety and Homeland Security Branch for their visibility of this outage. I will be requesting of the latter if/when this outage made it to the NORS because this certainly qualifies as a Major Outage by any measure.

Please respond, at very least, to the WA and OR counties because they retain responsibility over 911 in their counties, regardless of where the calls go.

Andy

William Andrew Leneweaver

Deputy State E911 Coordinator for Enterprise Services Washington State E911 Coordinator's Office

20 Aviation Drive, Camp Murray, WA 98430-5020

Desk: 253-512-7039 | Mobile: 253-302-9214 andy.leneweaver@mil.wa.gov Professional Entrepreneurial Leadership!

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SENT THRU mobile.wa.gov OWA

ATTACHMENT R



CenturyLink
1600 7th Avenue,
Seattle, Washington 98191
(206) 345-6224

Philip Grate
State Regulatory Affairs Director
Public Policy

Via E-mail

December 6, 2016

Rebecca Beaton
Regulatory Services Division, Utilities and Transportation Commission
1300 S. Evergreen Park Drive Southwest
Olympia, WA 98504

Ms. Beaton:

Provided below is a report compiled at my request by our network outage team regarding CenturyLink's transport shelf failure in The Dalles, OR on November 6, 2016 that affected Washington customers:

Overview

On November 6, 2016 at 2:50 a.m. (PST), CenturyLink began experiencing issues on a transport shelf in The Dalles, OR office that impacted the Klickitat and Skamania County Public Safety Answering Points (PSAPs). As a result of these issues, a CenturyLink Technician was dispatched to The Dalles office and initiated trouble shooting efforts. While the Technician was able to restore the impacted facilities to a simplex condition at 2:40 p.m., it was ultimately determined that the shelf could not be repaired to restore service to duplex. Therefore, plans were made to redesign and move the impacted circuits to a new platform later that week.

Unfortunately, at 6:00 p.m. that day, service again failed. The impacted cards were then moved to slots on the other side of the shelf, and service temporarily restored at 11:00 p.m. CenturyLink also brought a new controller to The Dalles office and attempted to power the impacted multiplexer down and up. Unfortunately, the multiplexer would not re-start. In an effort to restore service as quickly as possible, CenturyLink initiated work to build a temporary new system so that circuits could be groomed to it. Once the system was built, circuit grooming began and service started restoring at 12:33 p.m. on November 7, 2016. All service was restored to simplex when the circuit grooming was complete at 3:40 p.m. On November 17, 2016 work was completed to restore the service to duplex.

Service Impacts:

- 18,946 CenturyLink customers and 83,456 non-CenturyLink customers served by the Klickitat County PSAP were 911 isolated on November 6, 2016 from 8:00 a.m. until they were rerouted at 11:05 a.m.

- CenturyLink's Central Office in White Salmon, WA was toll isolated on November 6, 2016 from 2:50 a.m. to 2:40 p.m., which resulted in 911 services being unavailable for 1,792 customers during this time.
- 5,506 CenturyLink customers served by the Skamania County PSAP were 911 isolated from 3:06 a.m. to until they were rerouted at 5:02 a.m.
 - CenturyLink's Central Offices in White Salmon, WA, Willard, WA and Stevenson, WA were toll isolated on November 6, 2016 from 2:50 a.m. to 2:40 p.m., which resulted in 911 services being unavailable for 3,259 customers during this time.
 -
- CenturyLink was unable to determine the number of 911 test calls.

Additional Information

- The Dalles, OR and White Salmon, WA are served by both Klickitat **and** Skamania County PSAPs.
- Copies of the most current Network Outage Reporting System (NORS) reports requested are attached and marked "CONFIDENTIAL pursuant to WAC 480-07-160" and should be protected as such. Redacted versions are also provided.

If you have any questions regarding this report, please don't hesitate to contact me.

Sincerely,

Phil Grate