

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION,

Complainant,

v.

QWEST CORPORATION D/B/A  
CENTURLINK QC,

Respondent.

DOCKET UT-171082

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RULEMAKING TO CONSIDER  
POSSIBLE CHANGES TO RULES IN  
CHAPTER 480-120 WAC, RELATING TO  
SERVICE OBLIGATIONS OF  
TELEPHONE COMPANIES

DOCKET UT-180831

STAFF RESPONSE IN SUPPORT OF  
CENTURYLINK REQUEST TO STOP  
TRACKING SERVICE DENIALS

**I. INTRODUCTION**

1 Staff of the Washington Utilities and Transportation Commission (Commission), as an independent party in Docket UT-171082, files this response pursuant to WAC 480-07-375 to the motion of Qwest Corp. d/b/a CenturyLink QC (CenturyLink or Company) filed April 17, 2019, renewing the Company's request to stop tracking service denials. CenturyLink's motion was filed in Docket UT-171082 and Docket UT-180831, and this response is being filed in both dockets as well.

**II. BACKGROUND**

2 On January 31, 2019, CenturyLink filed a letter in both Docket UT-171082 and Docket UT-180831 requesting that the Commission terminate CenturyLink's obligation to track service denials. Commission Staff (Staff) as well as the Public Counsel Unit of the Washington State Attorney General's Office filed responses opposing CenturyLink's

request. The Commission served a notice March 6, 2019, stating that it would hold CenturyLink's request in abeyance until the Company had collected and submitted six months of the requisite data. In the notice, the Commission also stated that the Company could renew its request once it met the data collection and submission requirements.

3 CenturyLink filed a letter April 17, 2019, "renew[ing] its request to be relieved of the obligation to collect data regarding requests for service that are denied due to a lack of facilities." The Company's filing included a spreadsheet containing records of service denials for October 2018 through March 2019. This filing was made in the rulemaking docket (UT-180831) as well as in the complaint docket (UT-171082).

### III. DISCUSSION

4 CenturyLink has met the conditions of the Commission's notice of March 6, 2019. The Company has collected and submitted to the Commission six months of data concerning service denials. As these records are now on file in the rulemaking docket, Staff will be able to examine and evaluate the data as part of the rulemaking. It is appropriate to relieve CenturyLink of the obligation to retain service denial records. As a matter of fairness, Staff believes that it is appropriate to also relieve the other telecommunications companies regulated by the Commission of the obligation to track and retain records of service denials. Staff proposes that the Commission require all carriers to submit six months of service denial data to the Commission at this time. Once a company has provided the six months of service denial data to the Commission, it is appropriate to allow the company to cease tracking these records.

#### IV. CONCLUSION

5 Staff supports granting CenturyLink's request at this time. Because CenturyLink has collected the data required by the Commission in its notice, it is appropriate to relieve the Company of the obligation to retain service denial records and, further, it is appropriate to extend this relief to any other carrier that has collected and submitted to the Commission six months of service denial data.

DATED April 24, 2019.

Respectfully submitted,

ROBERT W. FERGUSON  
Attorney General

/s/ Jennifer Cameron-Rulkowski, WSBA No. 33734  
Assistant Attorney General  
Office of the Attorney General  
Utilities and Transportation Division  
P.O. Box 40128  
Olympia, WA 98504-0128  
(360) 664-1186  
jennifer.cameron-rulkowski@utc.wa.gov