

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,

Complainant,

v.

QWEST CORPORATION d/b/a
CENTURYLINK QC,

Respondent.

DOCKET UT-171082

ORDER 04

GRANTING REQUEST TO CEASE
TRACKING DENIALS OF LOCAL
SERVICE REQUESTS

BACKGROUND

- 1 On August 23, 2018, the Washington Utilities and Transportation Commission (Commission) entered Order 03, Final Order (Order 03). That Order, among other provisions, required Qwest Corporation d/b/a CenturyLink QC (CenturyLink or Company) to keep a record of requests for local exchange service the Company denies on the basis of lack of facilities to provide the requested service pending completion of the rulemaking in Docket UT-180831.
- 2 On January 31, 2019, CenturyLink submitted a letter requesting that the Commission relieve the Company of the obligation to track local service denials. CenturyLink stated that it does not track or retain this information in an easily identifiable and searchable way as part of the Company's regular business operations. CenturyLink contended that the manual processes it must use to comply with this record keeping requirement is time-consuming and burdensome and unduly takes Company employees away from their usual responsibilities.
- 3 Commission staff (Staff) and the Public Counsel Section of the Washington Attorney General's Office (Public Counsel) opposed CenturyLink's request. Staff and Public Counsel maintained that the required information is necessary to understand how CenturyLink is operating under the Commission's current line extension rule and whether the Commission should consider changes to that rule in Docket UT-180831.

- 4 On March 6, 2019, the Commission issued a notice holding CenturyLink's request in abeyance (Notice). The Notice provided that the Company could renew its request after it had collected and submitted six months of the required data.
- 5 On April 17, 2019, CenturyLink renewed its request to be relieved of the obligation to track local service denials. The Company contends that it has complied with the terms of the Notice and is continuing to spend 20 hours per month and divert four employees from their normal duties to collect this data, and CenturyLink questions the value of such resource expenditures.
- 6 On April 24, 2019, Staff filed a response in support of the Company's renewed request. Staff states that CenturyLink has provided six months of data as required in the Notice, and that it is appropriate to relieve the Company of its obligation to collect additional data. Staff also observes that the Commission should similarly relieve other local exchange companies of that same obligation. Public Counsel did not file a response.

DISCUSSION AND DECISION

- 7 We agree with Staff that the Commission now has initially sufficient data on CenturyLink's local service request denials and that the Company should no longer be required to collect such information at this time. Staff will analyze the data the Company has provided for purposes of the rulemaking in Docket UT-180831, and the Commission will consider in that docket whether any further record keeping is needed. The Commission will also issue a notice in the rulemaking that the other local exchange companies, too, may cease reporting local service denials once the companies have submitted six months of data.

ORDER

- 8 **THE COMMISSION ORDERS:**

- 9 (1) The Commission grants the request of Qwest Corporation d/b/a CenturyLink QC to cease tracking requests for local exchange service the Company denies on the basis of lack of facilities to provide the requested service.

- 10 (2) The Commission will review the data that Qwest Corporation d/b/a CenturyLink QC has provided in compliance with Order 03 and will determine in Docket UT-180831 whether any further or additional record keeping is necessary.

Dated at Olympia, Washington, and effective May 3, 2019.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

DAVID W. DANNER, Chairman

ANN E. RENDAHL, Commissioner

JAY M. BALASBAS, Commissioner