

**Exh. JDW-18
Docket UT-240029
Witness: John D. Webber**

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of the Petition of the

DOCKET UT-240029

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

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

EXHIBIT TO TESTIMONY OF

JOHN D. WEBBER

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

Response to Staff DR 10

April 3, 2024

Dockets UT-240029/UT-130477
Lumen Response to UTC Staff Data Request Nos. 1-47
March 1, 2024
Page 12

UTC STAFF DATA REQUEST NO. 10:

Please provide the dollar amount CenturyLink has invested in infrastructure in Washington, per year, from 2019 to 2023. Please also provide the locations of infrastructure investment in Washington State per year from 2019 to 2023.

RESPONSE:

CenturyLink objects to this data request on the basis that it is overly broad, unduly burdensome, vague and ambiguous and requires a special study. CenturyLink further objects on the basis that the request is not reasonably calculated to lead to the discovery of admissible evidence. The information sought is irrelevant to competitive classification. Among other things, this request appears to be seeking information regarding expenditures not relating to regulated services in Washington. Further, RCW 80.36.320 evaluates whether the company is subject to effective competition. It is unclear how scrutiny of the amount the company “has invested in infrastructure in Washington” addresses the question of whether the company has a substantial captive customer base or is otherwise subject to effective competition in the voice market.

Respondent: CenturyLink Legal