

**Exh. JDW-16
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 Nos. 58-59

April 3, 2024

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Lumen, by and through its counsel hereby objects and responds to UTC Staff Data Request Nos. 58-59:

GENERAL OBJECTIONS

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

1. Lumen objects to each data request to the extent that it seeks or purports to seek information protected by any applicable privilege or immunity, including the attorney-client privilege and work-product doctrine. Any inadvertent production of privileged or work-product protected material is not a waiver of the status of such work product, nor is any response herein to be deemed a waiver of any privilege, doctrine, or immunity.

2. Lumen objects to any data request or instruction that purports to require more than is required by the applicable rules of the Commission.

3. Lumen objects generally to each data request to the extent (i) that the information requested is known to UTC Staff or their counsel; (ii) the request requires disclosure of information, documents, writings, records, or publications in the public domain; or (iii) the information requested is equally available to UTC Staff or their counsel from sources other than Lumen.

4. Lumen objects to each data request to the extent that it is overly broad, vague and ambiguous, unduly burdensome, and calling for information that is irrelevant or not proportional to the needs of the case.

5. These responses are provided on the basis of the best information currently available to Lumen after diligent effort to gather such information within its possession, custody or control. Lumen reserves the right to amend these responses as new information is gathered.

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UTC STAFF DATA REQUEST NO. 58:

Provide the following information, separately for each of the five CenturyLink incumbent ILECs in Washington, i.e., Qwest Corporation ("QC"), CenturyTel of Washington ("CTEL"), CenturyTel of Interisland ("CTEL-I"), CenturyTel of Cowiche ("CTEL-C"), and United Telephone Company of the Northwest ("United").

During the past five years, has the ILEC prepared reports for purposes of internal monitoring of the telephone service quality it provides to its retail, single line basic local exchange customers in Washington (residential and business), on any of the following typical industry metrics?

- Trouble Report Rates
- Repeat Trouble Report Rates
- Customer Out-of-Service Restoration Intervals
- Customer Repair Appointment Commitments Met
- Service Installation Intervals

If the answer is yes for any of the metrics listed above, provide all such reports that were prepared by the ILEC that address its service quality within the timeframe of January 2019 through December 2023, including reports that address specific months or quarters within that overall timeframe.

If the answer is no, explain in detail why the ILEC has not prepared such reports to monitor the service quality it has been providing to those customers.

RESPONSE:

CenturyLink objects to this data request on the basis that it is overly broad, unduly burdensome, and seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. This proceeding concerns whether CenturyLink is subject to effective competition in its ILEC serving territories. This request seeks voluminous, granular and highly confidential information seemingly intended to evaluate the company's retail service quality and facilities over the past five years. CenturyLink's petition does not seek to modify the Commission's purview over the company's retail service quality as compared to the period the AFOR has been in effect. The 2014 AFOR contained a commitment (Condition B) that pertained to reporting pursuant to WAC 480-120-439(1), yet those requirements were repealed by the Commission in 2015.

Respondent: CenturyLink Legal

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UTC STAFF DATA REQUEST NO. 59:

Respond to this request separately for each of the five CenturyLink incumbent LECs in Washington, i.e., Qwest Corporation ("QC"), CenturyTel of Washington ("CTEL"), CenturyTel of Interisland ("CTEL-I"), CenturyTel of Cowiche ("CTEL-C"), and United Telephone Company of the Northwest ("United").

For the ILEC's retail, single line basic local exchange customers in Washington (residential and business), provide the following information, by month, by wire center, for the period January 2019 through December 2023.

- a. Number of access lines;
- b. Number of trouble reports;
- c. Number of trouble reports opened within 30 days of a previous trouble report on the same access line;
- d. Total out-of-service tickets;
- e. Total out-of service tickets cleared within 24 hours;
- f. Total repair tickets;
- g. Percentage of repair commitments met; for this response, also indicate how the ILEC sets its repair commitments timeframes;
- h. Number of new service orders; and
- i. Number of new service orders completed within 3 days of the order's receipt. If the ILEC tracks new service order completion using a different timeframe, please identify the timeframe and provide the number of service orders completed within the timeframe.

RESPONSE:

CenturyLink objects to this data request on the basis that it is overly broad, unduly burdensome, seeks a special study, and seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. This proceeding concerns whether CenturyLink is subject to effective competition in its ILEC serving territories. This request seeks voluminous, granular and highly confidential information seemingly intended to evaluate the company's retail service quality and facilities over the past five years. CenturyLink's petition does not seek to modify the Commission's purview over the company's retail service quality as compared to the period the AFOR has been in effect. The 2014 AFOR contained a commitment (Condition B) that pertained to reporting pursuant to WAC 480-120-439(1), yet those requirements were repealed by the Commission in 2015. CenturyLink further objects on the basis that this question seeks information already provided in response to Staff's discovery (see CenturyLink's response and three supplemental responses to Staff Data Request 19).

Respondent: CenturyLink Legal