



**UTC**

Washington Utilities  
and Transportation  
Commission

# **Investigation Report**

**CenturyLink Communications LLC, d/b/a Lumen Technologies Group, Qwest Corporation, CenturyTel of Washington, Inc., CenturyTel of Inter Island, Inc., CenturyTel of Cowiche, United Telephone Company of the Northwest**

UT-240117

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March 2025

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## **PURPOSE, SCOPE, AND AUTHORITY**

### **Purpose**

The purpose of this investigation is to determine whether CenturyLink Communications, LLC d/b/a Lumen Technologies, Qwest Corporation; CenturyTel of Washington, Inc.; CenturyTel of Inter Island, Inc.; CenturyTel of Cowiche; and United Telephone Company of the Northwest (collectively CenturyLink or Company) complied with laws and rules enforced by the Washington Utilities and Transportation Commission (Commission) set forth in chapter 80.36 Revised Code of Washington (RCW) and chapter 480-120 Washington Administrative Code (WAC).

### **Scope**

The scope of this investigation focuses on two areas. First, Commission Staff (Staff) investigated CenturyLink's business practices related to services rendered and if they are provided in a sufficient, prompt, and reasonable manner, ensuring equipment and facilities are in good condition and repair, modern, adequate, sufficient, and efficient.

Second, Staff investigated the Company's responsiveness to Commission-referred complaints, and whether it provided adequate, complete, and timely responses to Staff.

### **Authority**

Staff undertakes this investigation pursuant to RCW 80.01.040, which grants the Commission authority to regulate in the public interest the rates, services, facilities, and practices of all entities operating under public service laws; RCW 80.04.070, which grants any person employed by the Commission the right to inspect the accounts, books, papers, and documents of public service companies; and RCW 80.04.380, which authorizes the Commission to penalize public service companies for violations of state law, Commission rules, and other requirements.

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## EXECUTIVE SUMMARY

As a result of the increasing number of service quality informal consumer complaints filed with the Commission against CenturyLink, Staff concluded an investigation was necessary to determine if CenturyLink is in compliance with state laws and rules administered by the Commission. Staff reviewed service quality, service outages, and service interruptions data provided by the Company for the period of April 1, 2023, through March 12, 2024. Staff also reviewed informal consumer complaints filed with the Commission regarding service quality for the period of March 13, 2024, through January 1, 2025. As a result of this investigation, Staff documented a total of 1,663,664 violations. Staff found CenturyLink violated the following state laws and rules:

- RCW 80.36.080, Rates, services, and facilities
- WAC 480-120-411, Network Maintenance
- WAC 480-120-166, Commission-referred complaints

### Staff Recommendation

RCW 80.04.380 states that any public service company that fails to comply with provisions of this title or fails to comply with any order or rule shall be subject to a penalty of not more than \$1,000 for each and every offense, and every violation shall be a separate and distinct offense. In cases of a continuing violation, every day's continuance shall be deemed to be a separate and distinct offense.

Maximum penalties in this matter would be \$1.6 billion for a total of 1,663,664 violations. Staff does not recommend this level of penalties.

While the law allows the Commission to assess a penalty of up to \$1,000 per violation, Staff believes the full penalty would be overly burdensome due to the excessive number of violations. Staff recommends a penalty amount that results in an overall penalty level that appropriately addresses the seriousness of violations, provides a significant incentive to achieve compliance, and sufficiently encourages the Company to avoid repeat violations.

Staff recommends the Commission issue a formal complaint against CenturyLink and assess a total penalty of \$15,567,770 for the following violations:

- 827,828 violations of RCW 80.36.080 for failing to provide services in a sufficient, prompt, and reasonable manner and ensuring equipment and facilities were in good condition and repair, modern, adequate, sufficient, and efficient. Staff's penalty recommendation is based on an escalating methodology based on length of time the violations existed for the infrastructure violations. Staff breaks the violations into four-week increments. The penalties range from \$5 to \$100 per violation as follows, and totals \$7,183,285:

Weeks (Days)	Violations	Penalty per violation	Total penalty
1 to 4 (3 to 30)	698,637	\$5	\$3,493,185
5 to 8 (31 to 60)	58,107	\$15	\$871,605
9 to 12 (61 to 90)	31,033	\$25	\$775,828
13 to 16 (91 to 120)	15,636	\$35	\$547,260
17 to 20 (121 to 150)	8,578	\$45	\$386,010

21 to 24 (151 to 180)	5,225	\$55	\$287,375
25 to 28 (181 to 210)	2,956	\$65	\$192,140
29 to 32 (211 to 240)	4,225	\$75	\$316,875
33 to 36 (241 to 270)	2,006	\$85	\$170,510
37 to 42 (271 to 315)	1,425	\$100	\$142,500
<b>TOTALS:</b>	<b>827,828</b>		<b>\$7,183,285</b>

- 827,828 violations of WAC 480-120-411 for failing to provide adequate maintenance to ensure that all facilities are in safe and serviceable condition, failing to immediately correct conditions endangering continuity of service, and failing to promptly repair or replace broken, damaged, or deteriorated equipment when found to no longer be capable of providing adequate service. Staff’s penalty recommendation is based on an escalating methodology based on length of time the violations existed for the infrastructure violations. Staff breaks the violations into four-week increments. The penalties range from \$5 to \$100 per violation as follows, and totals \$7,183,285:

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29 to 32 (211 to 240)	4,225	\$75	\$316,875
33 to 36 (241 to 270)	2,006	\$85	\$170,510
37 to 42 (271 to 315)	1,425	\$100	\$142,500
<b>TOTALS:</b>	<b>827,828</b>		<b>\$7,183,285</b>

- \$150 for each of the 8,008 violations of WAC 480-120-166 for failing to thoroughly investigate all issues raised in a commission-referred complaint and provide a complete report of the results of its investigation to the commission, and for failing to respond to urgent complaints within two business days and to respond to Staff’s requests for additional information within three business days. The penalty recommendation for these violations is \$1,201,200.

## **BACKGROUND**

CenturyLink operates as a public service company regulated by the Commission, providing service as telecommunications companies. The table below shows each of the operating companies and their annual regulated intrastate revenue in 2023.

**Table 1 – Intrastate Revenue (2023)**

<b>Company Name</b>	<b>Washington Regulated Intrastate Revenue</b>	<b>Year</b>
CenturyLink Communications, LLC dba Lumen Technologies Group	\$14,899,939.59	2023
Qwest Corporation	\$166,467,953.03	2023
CenturyTel of Washington, Inc.	\$15,741,160.54	2023
CenturyTel of Inter Island, Inc.	\$2,098,758.32	2023
CenturyTel of Cowiche, Inc.	\$308,339.44	2023
United Telephone Company of the Northwest	\$8,558,929.15	2023
<b>TOTAL WA Regulated Intrastate Revenue</b>	<b>\$208,075,080.07</b>	<b>2023</b>

### **Compliance History**

A review of CenturyLink’s recent compliance history reveals the Commission has filed several complaints against the Company resulting in violations and penalties.

#### ***Docket UT-240078***

Penalty assessment of \$133,500 assessed against CenturyLink Communications, LLC d/b/a Lumen Technologies Group, Qwest Corporation, CenturyTel of Washington, Inc., CenturyTel of Inter Island, Inc., CenturyTel of Cowiche, Inc., and United Telephone Company of the Northwest for a total of 178 violations - 9 violations of WAC 480-120-133(2)(c) for failing to maintain an average time of 60 seconds or less from the time a caller selects the appropriate option to speak to a representative, and 169 violations of WAC 480-07-175(2)(b) for failing to respond to Staff’s request for information.

#### ***Docket UT-220397***

Penalty assessment of \$226,600 assessed against CenturyLink Companies – Qwest Corporation, CenturyTel of Washington, CenturyTel of Inter Island, CenturyTel of Cowiche, and United Telephone Company of the Northwest for 2,266 violations of Commission Order 04 in Docket UT-130477 with respect to the “Rate Change Notification” requirement.

#### ***Docket UT-210902***

Penalty assessment of \$692,250 assessed against CenturyLink Communications, LLC d/b/a Lumen Technologies Group, Qwest Corporation, CenturyTel of Washington, Inc., CenturyTel of Inter Island, Inc., CenturyTel of Cowiche, Inc., and United Telephone Company of the Northwest for 923 violations of WAC 480-120-172(3)(a). The Company disconnected or suspended telecommunications service to 923 residential customers from March 23, 2020, through Sept. 30, 2021.

#### ***Docket UT-181051***

Penalty assessment of \$1,315,000 assessed against CenturyLink Communications, LLC for 13,000 violations of RCW 80.36.080 for failure to provide E911 services, and 15 violations of WAC 480-120-412(2) for failing to promptly notify Public Safety Answering Points (PSAPs) and the Commission of a major outage.

***Docket UT-140597***

Penalty assessment of \$2,854,750 assessed against Qwest Corporation d/b/a CenturyLink QC for failing to route 911 calls as required; for 5,840 violations of RCW 80.36.080 and WAC 480-120-450(1) for failure to provide E911 services, and 51 violations of WAC 480-120-412(2) for failing to promptly notify Public Safety Answering Points (PSAPs) of a major outage.

***Docket UT-132234***

Penalty assessment of \$173,210 against CenturyLink for failing to notify the Commission and Public Safety Answering Points of a major outage. \$123,210 was suspended then waived after one year if CenturyTel of Inter Island, Inc. d/b/a CenturyLink does not violate WAC 480-120-412 or the provisions of the Emergency Communications Plans during that time. This left \$50,000 due and payable for 15,935 violations of WAC 480-120-412, due to a San Juan Island major outage. The Commission later imposed the \$123,210 portion of the assessed penalty that was previously suspended in Order 03 because the Company violated WAC 480-120-412 and the Emergency Communications Plans.

***811 Washington State Dig Law***

There have also been several penalty assessments issued against the Company for violation of Washington State Dig Law, RCW 19.122 resulting in penalties ranging from \$5,000 to \$15,000.

**Technical Assistance**

Consistent with [RCW 43.05](#), the Commission attempts to ensure compliance with statutes, rules, orders and tariffs by providing technical assistance to encourage voluntary compliance by companies it regulates. The Commission’s technical assistance program includes but is not limited to, informing companies of Commission requirements by telephone, in writing, or through electronic means in the context of resolving customers’ informal complaints. Each contact provides an opportunity for Staff to provide the Company with technical assistance.

*Informal Consumer Complaints* – Through the informal consumer complaint process, Staff provides technical assistance to companies when they are found to be violating Commission laws or rules. The technical assistance describes each violation and how it conflicts with laws and rules. When Staff finds the actions of the company to be improper, the consumer complaint is “Consumer Upheld” and technical assistance is provided. The following table shows the steady increase over the past five years to 1) the total number of CenturyLink consumer complaints that Staff closed, 2) the number of complaints filed that were related to service quality, and 3) the number of total complaints that were closed as “Consumer Upheld,” resulting in a significant amount of technical assistance being provided to the Company by Staff.

**Table 2 – CenturyLink Complaints: Service Quality**

<b>Year</b>	<b>Total Complaints Closed</b>	<b>Total Complaints Related to Service Quality</b>	<b>Total Complaints that Were Consumer Upheld</b>
2020	200	116	54
2021	326	211	159
2022	490	373	316
2023	510	427	384
2024	661	597	587

# INVESTIGATION

On March 12, 2024, Staff initiated this investigation to determine if 1) CenturyLink's equipment and facilities are adequate, sufficient and efficient, and kept in good condition and repair and 2) the Company promptly repairs or replaces broken, damaged, or deteriorated equipment and promptly restores services.

## **CenturyLink Consumer Complaint Trends**

The number of consumer complaints, as well as complaints related to service quality, filed against CenturyLink has steadily increased over the past five years (shown in Table 2). Consumer Protection Staff generally meet with CenturyLink representatives on an annual basis to discuss what is working well, areas of concern, Company's consumer complaint trend reports, and other industry issues that may arise.

On September 28, 2022, the Commission's Consumer Protection Staff and the Company met. CenturyLink attendees were Scott Belka, Peter Gose, and Cindy Girtman. Commission Staff attendees were Anna Gill, Bridgit Feeser, Sheri Hoyt, and Andrew Sellards. Staff expressed concerns to the Company about an 80% increase in service quality complaints. At that point, there were still three months remaining in the year that would likely result in a higher increase. The 2022 end-of-year company consumer trend report ended with an 89% increase in service quality complaints.

On December 20, 2023, Consumer Protection Staff and the Company met. CenturyLink attendees were Peter Gose, Director State and Local Government Affairs; Cindy Girtman, Manager Customer Service; Channing Williams, Supervisor Operations; Monica Echevarriagarcia, Associated general counsel. Commission Staff attendees were Bridgit Feeser, Consumer Protection Director; Sheri Hoyt, Consumer Protection Manager; Andrew Roberts, Regulatory Analyst; and Kris Irelan, Regulatory Analyst. At the meeting Staff presented and discussed the Company's consumer complaint trends. The Company concurred with Staff that there has been a big jump in consumer complaint numbers from 2019 to now. The Company attributed the increase in complaints regarding lack of service to more people working from home than pre-pandemic and that customers care more that their phone service is not working, that out of service complaints were due to copper wire theft, and the Company's equipment is aging as it was installed 30, 40, to 50 years ago. CenturyLink representatives also stated they would like to have zero complaints but that is not reality with an old system that requires electronics.

## **Data Request**

On March 12, 2024, Staff sent the Company a data request letter requesting data and information for the period of January 1, 2023, through March 12, 2024, pertaining to each of the following CenturyLink companies: CenturyLink Communications, LLC d/b/a Lumen Technologies Group, Qwest Corporation, CenturyTel of Washington, Inc., CenturyTel of Inter Island, Inc., CenturyTel of Cowiche, Inc., and United Telephone Company of the Northwest. The Company was asked to provide the following information by March 26, 2024:<sup>1</sup>

1. Lumen Technologies Corporate Structure
2. Maintenance and Repair Policies
3. Broken, Damaged, and Deteriorated Equipment
4. Line Quality Testing

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<sup>1</sup> Attachment A: Data Request dated March 12, 2023.



5. Test Apparatus
6. Monitoring Network Performance
7. Routine and Emergency Repairs
8. Customer Complaints
9. Outages and Interruptions
10. Battery and Power backup

On March 15, 2024, the Company requested and was granted an extension to April 9, 2024, to provide most of the requested information. The Company requested several due date extensions which Staff approved, and the Company provided the last set of responsive records on July 12, 2024.

Staff reviewed information and data provided by the Company and focused on service quality problems and service outages/interruptions.

Because the period of January 1, 2023, through March 31, 2023, is now outside the statute of limitations for a complaint with penalties to be filed, Staff only considered data provided by the Company for the period of April 1, 2023, through March 12, 2024, for this report and recommendation. Staff also only focused on service quality problems and outages that continued for three days or more for the same period.

## **NETWORK MAINTENANCE**

RCW [80.36.080](#), Rates, services, and facilities. This law requires telecommunication companies' service rendered and equipment and facilities supplied be fair, just, reasonable and sufficient, and services performed in a prompt expeditious and efficient manner, and facilities and equipment be safe, kept in good condition and repair, be modern, adequate, sufficient, and efficient.

RCW [80.36.220](#), Duty to transmit messages—Penalty for refusal or neglect. This law requires telecommunications companies to receive, exchange and transmit messages without delay or discrimination, and all telecommunications companies shall receive and transmit messages for any person.

WAC [480-120-401](#), Network Performance Standards. This rule requires companies to meet network performance standards at a minimum acceptable quality of service under normal operating conditions.

WAC [480-120-411](#), Network Maintenance. This rule requires companies to provide adequate maintenance to ensure that all facilities are in safe and serviceable condition and to promptly repair or replace broken, damaged, or deteriorated equipment when found to be no longer capable of providing adequate service.

General Order R-578, Docket UT-160196.<sup>2</sup> Staff initiated a rulemaking to, among other things, reinstate WAC 480-120-440 that included a 48-hour repair standard for service interruptions impairments, excluding major outages, that was repealed in 2015 (Docket UT-140680). While the Commission did not find sufficient evidence that WAC 480-120-440 was inadvertently removed, it stated, "we find that, in the absence of extenuating circumstances, 48 hours is an appropriate benchmark for determining whether a company has "promptly" repaired or restored service problems in compliance with WAC 480-120-411."

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<sup>2</sup> Attachment B: General Order R-578, Docket UT-160196.

## Service Quality

Staff requested the Company identify the number of customer complaints received by CenturyLink regarding service quality from January 1, 2023, through March 12, 2024, including when the complaint was received and resolved. In its response, the Company referred Staff to “Attachment Staff 39a,” a spreadsheet that CenturyLink provided on April 23, 2024.<sup>3</sup>

As stated above, Staff only considered data provided by the Company for the period of April 1, 2023, through March 12, 2024. Also, Staff only focused on service quality problems that continued for three days or more for the same period.

Data shows 1,237 customers continued to have service quality problems for three days and longer. The table below sets forth the data for customers whose service quality problems continued for longer than 48 hours, showing the number of customers affected and the total number of days the service quality problem continued before it was resolved.

**Table 3 – Service Quality Problems**

<b>Service Quality Problems - number of days (after 48 hours) measured in 4-week increments</b>	<b>Number of Customers Impacted</b>	<b>Total Days to Resolve Service Problem (after 48 hours)</b>
3-30	856	14,534
31-60	228	9,918
61-90	93	6,839
91-120	38	3,921
121-150	15	1,983
151-180	3	502
181-210	0	0
211-240	4	945
<b>TOTAL:</b>	<b>1,237</b>	<b>38,642</b>

In this data set, a total of 1,237 customers were negatively impacted by having inadequate service for the period of April 1, 2023, through March 12, 2024. In addition, service quality problems continued for 38,642 days beyond 48 hours. It is alarming that inadequate service continued for up to eight months for some customers.

Staff finds a total of 38,642 violations of RCW 80.36.080 and a total of 38,642 violations of WAC 480-120-411. Violations are assessed for each day that service problems continued beyond 48 hours for the period of April 1, 2023, through March 12, 2024.

## Service Outages/Interruptions

In the data request to the Company, Staff requested the number of “service outages” and “service interruptions” experienced from January 1, 2023, through March 12, 2024, including the number of customers affected and when the service outages and interruptions were received and resolved. In its

<sup>3</sup> “Attachment Staff 39a” contains a large data set. Due to the size and format, it is not attached to this Investigation Report.

response the Company referred Staff to spreadsheets “Attachment 3b1” for a listing of every dispatched repair involving voice services or voice-related facilities, and “Attachment 3b2” for a listing of all Network Operations Center dispatches. The company provided these spreadsheets on April 23, 2024.<sup>4</sup> As stated previously, Staff only considered data provided by the Company for the period of April 1, 2023, through March 12, 2024.

Data shows that 29,416 customers had no service and experienced service interruptions for three days and longer. The total number of days over 48 hours that customers had no service was 769,627. In Attachment 3b1, the Company coded 616 complaints as “vandalism.” Of those 616 complaints, 422 customers had no service for three days and longer. Staff understands that cable theft is an extenuating circumstance that may require longer than 48 hours to restore service; therefore, Staff elected to deduct the 422 vandalism complaints that exceeded a 48-hour restoral time from the 29,416 total customers who had no service and experienced service interruptions for three days and longer. This leaves 28,994 customers who were adversely affected. Removing the 422 vandalism complaints from consideration also reduces the total number of days over 48 hours to restore service from 769,627 days to 762,649.

Even though Staff does not recommend penalties for the 422 vandalism complaints that exceeded a 48-hour restoral time, this does not negate Staff’s great concern with the Company’s lack of timeliness and proactiveness in repairing and restoring service outages, even those due to cable theft. During consumer complaint investigations, the Company has advised Staff that repair tickets are in “unscheduled status,” and Staff’s understanding of “unscheduled status” is that the repair ticket has not been assigned to a technician or scheduled for a repair. Excerpts from a consumer complaint is included with this report as an example of where CenturyLink reported to Staff that the repair ticket status was “unscheduled” numerous times. (CAS-44715)<sup>5</sup>

In other service outage complaints, stolen cable may eventually be replaced but outages continue until the Company has staff, trucks, etc., available to complete the service restoration. An example, which is representative of what Staff hears from CenturyLink customers, is a CenturyLink customer reported to Staff their original repair ticket for a service outage was generated on January 26, 2024, and was closed on August 21, 2024. CenturyLink sent a notice to the customer informing them their landline had been restored. The customer contacted CenturyLink that same day to report that their landline had not been restored. CenturyLink then opened a new repair ticket and the customer's landline continues to be out of service. (CAS-47069)<sup>6</sup>

The table below sets forth the data for customers whose service outages and interruptions continued for longer than 48 hours, showing the number of customers affected and the total number of days the service outage/interruption continued before it was resolved.

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<sup>4</sup> “Attachment 3b1” and “Attachment 3b2” contains a large data set. Due to the size and format, it is not attached to this Investigation Report.

<sup>5</sup> Attachment C: excerpt from consumer complaint record CAS-44715.

<sup>6</sup> Attachment D: excerpt consumer complaint record CAS-47069.

**Table 4 – Service Outages and Interruptions**

<b>Service Outages/Interruptions - number of days (after 48 hours) measured in 4-week Increments</b>	<b>Number of Customers Impacted</b>	<b>Total Days to Restore Service (after 48 hours)</b>
3-30	27,545	680,410
31-60	1,037	43,098
61-90	263	19,048
91-120	88	9,177
121-150	26	3,503
151-180	11	1,834
181-210	5	963
211-240	8	1,759
241-270	7	1,736
271-300	4	1,121
<b>TOTAL:</b>	<b>28,994</b>	<b>762,649</b>

In this data set, a total of 28,994<sup>7</sup> customers were negatively impacted by having no phone service for the period of April 1, 2023, through March 12, 2024. In addition, service outages/interruptions continued for 762,649 days<sup>8</sup> beyond 48 hours. Staff is extremely alarmed at the number of customers who did not have phone service due to outages and interruptions. Data shows that outages/interruptions continued for up to 10 months for some customers.

Staff finds a total of 762,649 violations of RCW 80.36.080 and a total of 762,649 violations of WAC 480-120-411. Violations are assessed for each day that outages and interruptions continued beyond 48 hours for the period of April 1, 2023, through March 12, 2024.

### **Consumer Complaint – Service Quality/Outages/Interruptions**

Staff reviewed informal consumer complaints filed with the Commission against CenturyLink regarding service quality, outages, and service interruptions for the period of March 13, 2024, to January 31, 2025. Data shows Staff recorded violations in 505 consumer complaints for CenturyLink’s failure to promptly repair or restore service as required by WAC 480-120-411.

It should be noted that as of March 24, 2025, there are 327 service quality complaints against CenturyLink that are still open and unresolved. The oldest unresolved quality of service complaint was opened on October 26, 2023. Because the Company continues to fail to promptly repair or restore service as required by WAC 480-120-411, these complaints will continue to accrue numerous violations of WAC 480-120-411.

The table below sets forth the data for customers whose service quality problems and service outages/interruptions continued longer than 48 hours, showing the number of customers affected and total days the service problems/outages continued before it was resolved.

<sup>7</sup> 29,416 minus 422 for cable theft/vandalism.

<sup>8</sup> 769,627 minus 6,978 days for cable theft/vandalism.

**Table 5 – Consumer Complaint Data: Service Quality Problems / Outages / Interruptions**

<b>Service Quality Problems/Outages - number of days (after 48 hours) measured in 4-week increments</b>	<b>Number of Customers Impacted</b>	<b>Total Days to Restore Service Quality/Outages (after 48 hours)</b>
3-30	233	3,693
31-60	118	5,091
61-90	69	5,146
91-120	25	2,538
121-150	23	3,092
151-180	18	2,889
181-210	10	1,993
211-240	7	1,521
241-270	1	270
271-300	0	0
301-315	1	304
<b>TOTAL:</b>	<b>505</b>	<b>26,537</b>

In this data set, 505 customers were negatively impacted by having inadequate service and no phone service for the period of March 13, 2023, through January 31, 2025. In addition, service quality problems and service outages/interruptions continued for 26,537 days beyond 48 hours.

Staff finds a total of 26,537 violations of RCW 80.36.080 and a total of 26,537 violations of WAC 480-120-411. Violations are assessed for each day that service problems, outages, and interruptions continued beyond 48 hours for the period of March 13, 2023, through January 31, 2025.

**Findings Related to Service Quality, Outages, and Interruptions**

Staff finds CenturyLink committed 827,828 violations of RCW 80.36.080, Rates, services, and facilities and 827,828 violations of WAC 480-120-411, Network Maintenance, for a total of 1,655,656 violations related to service quality, outages, and interruptions. The violations for each RCW 80.36.080 and WAC 480-120-411 are as follows:

- Failure to promptly resolve service quality problems for 1,237 customers for the period of April 1, 2023, through March 12, 2024, for a total of 38,642 violations, one for each day beyond 48 hours that service quality problems continued. The violations were distributed over four-week increments as follows:

<b>Weeks (Days)</b>	<b>Violations</b>
1 to 4 (3 to 30)	14,534
5 to 8 (31 to 60)	9,918
9 to 12 (61 to 90)	6,839
13 to 16 (91 to 120)	3,921
17 to 20 (121 to 150)	1,983

21 to 24 (151 to 180)	502
25 to 28 (181 to 210)	0
29 to 32 (211 to 240)	945
<b>TOTAL:</b>	<b>38,642</b>

- Failure to promptly restore service outages/interruptions for 28,994 customers for the period of April 1, 2023, through March 12, 2024, for a total of 762,649 violations, one for each day beyond 48 hours that the service outages/interruptions continued. The violations were distributed over four-week increments as follows:

<b>Weeks (Days)</b>	<b>Violations</b>
1 to 4 (3 to 30)	680,410
5 to 8 (31 to 60)	43,098
9 to 12 (61 to 90)	19,048
13 to 16 (91 to 120)	9,177
17 to 20 (121 to 150)	3,503
21 to 24 (151 to 180)	1,834
25 to 28 (181 to 210)	963
29 to 32 (211 to 240)	1,759
33 to 36 (241 to 270)	1,736
37 to 42 (271 to 315)	1,121
<b>TOTAL:</b>	<b>762,649</b>

- Failure to promptly resolve service quality problems and restore service outages for 505 customers for the period of March 13, 2024, through January 31, 2025, for a total of 26,537 violations, one for each day beyond 48 hours that the service problems and service outages/interruptions continued. The violations were distributed over four-week increments as follows:

<b>Weeks (Days)</b>	<b>Violations</b>
1 to 4 (3 to 30)	3,693
5 to 8 (31 to 60)	5,091
9 to 12 (61 to 90)	5,146
13 to 16 (91 to 120)	2,538
17 to 20 (121 to 150)	3,092
21 to 24 (151 to 180)	2,889
25 to 28 (181 to 210)	1,993
29 to 32 (211 to 240)	1,521
33 to 36 (241 to 270)	270
37 to 42 (271 to 315)	304
<b>TOTAL:</b>	<b>26,537</b>

### **Recommendation**

Staff recommends that CenturyLink be assessed a penalty of \$7,183,285 for 827,828 violations of RCW 80.36.080 for failing to provide services in a sufficient, prompt, and reasonable manner and ensuring

equipment and facilities were in good condition and repair, modern, adequate, sufficient, and efficient. Staff's penalty recommendation is based on an escalating methodology based on length of time the violations existed for the infrastructure violations. Staff breaks the violations into four-week increments. The penalties range from \$5 to \$100 per violation as follows:

<b>Weeks (Days)</b>	<b>Violations</b>	<b>Penalty per violation</b>	<b>Total penalty</b>
1 to 4 (3 to 30)	698,637	\$5	\$3,493,185
5 to 8 (31 to 60)	58,107	\$15	\$871,605
9 to 12 (61 to 90)	31,033	\$25	\$775,825
13 to 16 (91 to 120)	15,636	\$35	\$547,260
17 to 20 (121 to 150)	8,578	\$45	\$386,010
21 to 24 (151 to 180)	5,225	\$55	\$287,375
25 to 28 (181 to 210)	2,956	\$65	\$192,140
29 to 32 (211 to 240)	4,225	\$75	\$316,875
33 to 36 (241 to 270)	2,006	\$85	\$170,510
37 to 42 (271 to 315)	1,425	\$100	\$142,500
<b>TOTALS:</b>	<b>827,828</b>		<b>\$7,183,285</b>

Staff further recommends that CenturyLink be assessed a penalty of 7,183,285 for 827,828 violations of WAC 480-120-411 for failing to provide adequate maintenance to ensure that all facilities are in safe and serviceable condition, failing to immediately correct conditions endangering continuity of service, and failing to promptly repair or replace broken, damaged, or deteriorated equipment when found to no longer be capable of providing adequate service. Staff's penalty recommendation is based on an escalating methodology based on length of time the violations existed for the infrastructure violations. Staff breaks the violations into four-week increments. The penalties range from \$5 to \$100 per violation as follows:

<b>Weeks (Days)</b>	<b>Violations</b>	<b>Penalty per violation</b>	<b>Total penalty</b>
1 to 4 (3 to 30)	698,637	\$5	\$3,493,185
5 to 8 (31 to 60)	58,107	\$15	\$871,605
9 to 12 (61 to 90)	31,033	\$25	\$775,828
13 to 16 (91 to 120)	15,636	\$35	\$547,260
17 to 20 (121 to 150)	8,578	\$45	\$386,010
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33 to 36 (241 to 270)	2,006	\$85	\$170,510
37 to 42 (271 to 315)	1,425	\$100	\$142,500
<b>TOTALS:</b>	<b>827,828</b>		<b>\$7,183,285</b>

## **COMMISSION-REFERRED COMPLAINTS**

WAC 480-120-166, Commission-referred complaints, requires telephone companies to thoroughly investigate all issues raised in a Commission-referred complaint and provide a complete report of the results of its investigation to the Commission, to respond to urgent complaints within two business days, and to respond Staff’s request for additional information within three business days. The Company must also keep Staff informed when relevant changes occur from what has been previously communicated, and when there is final resolution of the informal complaint.

In almost every CenturyLink consumer complaint regarding service quality and service outages/interruptions, the Company does not inform Staff about the cause of the service outage, actions the Company is taking to resolve the service problem, or when it expects to have the service repaired. In addition, the Company frequently does not provide a response to Staff by the date required by WAC 480-120-166. In many complaints, the Company conveys to Staff that the customer’s service has been repaired or restored, but when Staff contacts the customer to confirm their phone service is fixed, the customer relays there is no change to their service problems.

CenturyLink has advised Staff that its technicians do not confirm directly with the customer that service has been fixed for outages affecting more than one customer. CenturyLink instead relies on Staff to contact the customer and ask if their service issues are ongoing.

The Company’s failure to comply with WAC 480-120-166 has significantly increased the amount of time it takes for Staff to attempt to resolve and close consumer complaints. It also impairs Staff’s ability to provide substantive information to CenturyLink customers regarding when their service will be fixed.

The Company’s failure to provide substantive responses, or in many instances any response at all, about what the Company is doing to fix or restore customers’ service creates a negative perception of the Commission for the public. Customers file a complaint with the Commission to get assistance in resolving issues with their utility company and regularly contact Staff for updates regarding their complaint. Customers get frustrated with Staff and believe Staff are not doing enough to help restore their service when month after month Staff are unable to provide any updates or information to the customer.

The table below sets forth the data for the number of customers who experienced a lack or delay of information pertaining to their service quality complaint filed with the Commission between March 13, 2023, and January 31, 2025, showing the number of customers affected and total days the company failed to respond timely and adequately to Staff.

**Table 6 – Commission-Referred Complaint: Responses from CenturyLink**

<b>CenturyLink responses to requests for information beyond due date - measured in 4-week increments</b>	<b>Number of Customers Impacted</b>	<b>Total Days</b>
1-30	323	3,050
31-60	66	2,733
61-90	22	1,568



91-120	3	327
121-150	0	0
151-180	2	330
<b>TOTAL:</b>	<b>416</b>	<b>8,008</b>

In this data set, 416 customers were negatively impacted due to lack of responses and information from the Company for the period of March 13, 2023, through January 31, 2025. In addition, lack of information and responses continued for 8,008 days.<sup>9</sup> Staff is greatly concerned because after receiving thousands of violations and substantial technical assistance, CenturyLink has not changed its business practices and is still not providing substantive responses to Staff for the hundreds of consumer complaints currently pending.

Staff finds a total of 8,008 violations of WAC 480-120-166. Violations are assessed for each day that CenturyLink failed to provide adequate responses to Staff’s request for information related to Commission-referred complaints for the period of March 13, 2023, through January 31, 2025.

### **Findings Related to Commission-Referred Complaints**

Staff finds CenturyLink committed 8,008 violations of WAC 480-120-166, Commission-referred complaints, by failing to thoroughly investigate all issues raised in a Commission-referred complaint and provide a complete report of the results of its investigation to the Commission. In addition, the Company has failed to respond to urgent complaints within two business days and to respond to Staff’s requests for additional information within three business days.

### **Recommendation**

Staff recommends that CenturyLink be assessed a total penalty of \$1,201,200, which consists of \$150 penalty for each of the 8,008 violations of WAC 480-120-166 for failing to thoroughly investigate all issues raised in a Commission-referred complaint and provide a complete report of the results of its investigation to the Commission, to respond to urgent complaints within two business days, and to respond to Staff’s request for additional information within three business days.

## **TECHNICAL ASSISTANCE**

Consumers have expressed extreme frustration with CenturyLink regarding missed appointments. Customers regularly report to Staff that CenturyLink will schedule an appointment for a specific date and then never show up or call to cancel the appointment. Customers have reported it is a never-ending cycle of missed appointments, rescheduled appointments, and more missed appointments. Customers have reported this occurs time after time as they wait for their service to be fixed or restored, up to as many as 10 or more missed appointments. For example, one customer reported that the Company missed appointments without contacting the customer on July 13, July 23, July 25, August 7, September 6, September 9, September 13, September 17, September 24, October 8, and October 10, 2024. (CAS-46698)<sup>10</sup> In another example a customer reported that the Company missed appointments without contacting the customer on July 11, July 13, July 22, July 29, August 8, August 12, August 13, August 15,

<sup>9</sup> Attachment E: List of consumer complaints and the number of days beyond the response time requirement.

<sup>10</sup> Attachment F: excerpt from consumer complaint record CAS 46698.

and August 19, 2024. (CAS-46667)<sup>11</sup> These are just a couple of examples that have been reported to Staff by CenturyLink customers, but they are representative of what Staff has heard from customers.

The Company typically schedules appointments for anytime between 8 a.m. to 5 p.m., with some evening appointments. For many appointments, CenturyLink tells the customer someone over the age of 18 must be present in case the Company needs access to inside the home; therefore, customers stay home all day waiting for a technician to show up often taking time off from work. When the technician does not show up and does not cancel the appointment in advance, the negative impact to customers includes potential loss of pay for taking off from work, unproductive use of their time, and service problems continuing without timely resolution.

The Company is aware of the continuously missed appointments and customers' frustrations. In a February 2025 KIRO 7 news story, customers profiled shared their story about the number of appointments the Company missed without a phone call to cancel.<sup>12</sup> During consumer complaint investigations, Staff shared with CenturyLink customers' complaints about the missed appointments. Customers have also expressed those complaints directly to the Company. Regardless, the Company continues this practice. This is extremely poor customer service by the Company, deprives consumers of their time and effort to resolve company related issues. Moreover, it shows the Company's lack of concern for its customers.

Through this investigation report, Staff is providing technical assistance to CenturyLink to immediately change its business practices and correct its process for scheduling, canceling, and rescheduling customer appointments. Staff also requests the Commission order the Company to change their business practices with regard to scheduling, canceling, and rescheduling customer appointments and with regard to honoring appointments. Staff requests that the Commission require CenturyLink to keep data showing appointments scheduled, attended, and canceled or rescheduled. This data should be filed with the Commission on a yearly basis.

## SUMMARY OF RECOMMENDATIONS

Pursuant to the Enforcement Policy of the Washington Utilities and Transportation Commission (Docket A-120061), Staff considered the following factors in determining the appropriate recommended penalty amount for these violations:

### **1. How serious or harmful the violation is to the public.**

The violations are both serious and harmful to the public. CenturyLink has a duty to provide adequate service, timely restore service, and ensure its equipment and facilities are in good condition and repair, modern, adequate, sufficient, and efficient.

Facts in this case show customers have gone weeks and up to 10 months without adequate phone service or, in some instances, any phone service at all. The following is representation of harm to customers as reported by them to Staff during their consumer complaint investigation. Customers have reported to Staff that their health devices do not work due to inadequate or no phone service.

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<sup>11</sup> Attachment G: excerpt from consumer complaint record CAS-46667.

<sup>12</sup> Link to KIRO 7 news story: [WA's UTC expected to complete investigation into CenturyLink landline issues – KIRO 7 News Seattle](#).

Customers have reported their inability to call 911 in emergency situations due to inadequate or no phone service. (CAS-46693)<sup>13</sup> Customers have reported their home security systems are not working as they should be due to inadequate or no phone service. Customers have reported their inability to make doctors' appointments and contact family members due to inadequate or no phone service. Customers report that using cell phones is not an alternative for them as cell service is not reliable where they live.

**2. Whether the violation is intentional.**

The Company is fully aware of the issues raised in this investigation report. Customers' concerns about quality service problems and service outages/interruptions are well known to the Company, yet customer complaints continue to rise drastically. Staff have provided copious amounts of technical assistance to the Company regarding quality service problems and service outages/interruptions, and failure to provide Staff complete, adequate, and timely responses to commission-referred complaints. The Company has not prioritized decreasing the number of violations addressed in this investigation. CenturyLink has been willfully indifferent regarding its compliance with RCW 80.36.080, WAC 480-120-411, and WAC 480-120-166. Staff concludes that the willfully indifferent violations noted in this Investigation Report should be treated the same as intentional violations.

**3. Whether the company self-reported the violation.**

CenturyLink did not self-report these violations.

**4. Whether the company was cooperative and responsive.**

Staff believes the Company was sufficiently responsive to Staff requests for data and information throughout this formal investigation. While CenturyLink requested several extensions to provide data, Staff approved the Company's extension requests due to the large amount of information and data Staff requested. Staff ultimately received responsive data and was able to conduct its investigation.

**5. Whether the company promptly corrected the violations and remedied the impacts.**

Through the consumer complaint process, the Company has received thousands of violations and been provided with technical assistance for failing to comply with WAC 480-120-411, Network Maintenance, and WAC 480-120-166, Commission-referred complaints, but these violations continue. The Company has not corrected or remedied the violations.

**6. The number of violations.**

CenturyLink committed a total of 1,663,664 violations:

- 827,828 violations of RCW 80.36.080, Rates, services, and facilities.
- 827,828 violations of WAC 480-120-411, Network Maintenance.
- 8,008 violations of WAC 480-120-166, Commission-referred complaints.

**7. The likelihood of recurrence.**

Based on the consistent rise in service quality complaints, which include service outages/interruptions, after receiving technical assistance and thousands of violations, and the

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<sup>13</sup> Attachment H: excerpt from consumer complaint record CAS-46693.

Company's continued failure to provide Staff with adequate and timely information in response to commission-referred complaints, it is highly likely these types of violations will continue.

**8. The company's past performance regarding compliance, violations, and penalties.**

Over the past five years, CenturyLink has been subject to nearly 2,000 commission-referred complaints regarding quality of service and service outages, which have resulted in an abundant number of violations for failing to comply with RCW 80.36.080, WAC 480-120-166, and WAC 480-120-411. The number of consumer complaints about quality of service and service outages continue to increase year after year, as well as the number of violations recorded against the Company. Staff seen no improvement.

In addition, CenturyLink has had several formal enforcement actions taken against them by the commission that have resulted in significant penalty assessments.

**9. The company's existing compliance program.**

Staff is not aware of any existing compliance program related to RCW 80.36.080, WAC 480-120-166, and WAC 480-120-411.

**10. The size of the company.**

The combined Washington Regulated Intrastate Revenue for the six CenturyLink Companies named in this report total \$208,075,080.07 for 2023. The following is a breakdown of each operating company:

- CenturyLink Communications, LLC dba Lumen Technologies Group - \$14,899,939.59
- Qwest Corporation - \$166,467,953.03
- CenturyTel of Washington, Inc. - \$15,741,160.54
- CenturyTel of Inter Island, Inc. - \$2,098,758.32
- CenturyTel of Cowiche, Inc. - \$308,339.44
- United Telephone Company of the Northwest - \$8,558,929.15

**Penalty Recommendation**

RCW 80.04.380 states that any public service company that fails to comply with provisions of this title or fails to comply with any order or rule shall be subject to a penalty of not more than \$1,000 for each and every offense, and every violation shall be a separate and distinct offense. In cases of a continuing violation, every day's continuance shall be deemed to be a separate and distinct offense.

While the law allows the commission to assess a penalty of up to \$1,000 per violation, Staff believes the full penalty would be overly burdensome due to the excessive number of violations. The recommended penalty provides a significant incentive to avoid repeat violations.

Staff recommends the Commission issue a formal complaint against CenturyLink and assess a total penalty of \$15,567,770 for the following violations:

- 827,828 violations of RCW 80.36.080 for failing to provide services in a sufficient, prompt, and reasonable manner and ensuring equipment and facilities were in good condition and repair, modern, adequate, sufficient, and efficient. Staff's penalty recommendation is based on an escalating methodology based on length of time the violations existed for the infrastructure

violations. Staff breaks the violations into four-week increments. The penalties range from \$5 to \$100 per violation as follows, and totals \$7,183,285:

<b>Weeks (Days)</b>	<b>Violations</b>	<b>Penalty per violation</b>	<b>Total penalty</b>
1 to 4 (3 to 30)	698,637	\$5	\$3,493,185
5 to 8 (31 to 60)	58,107	\$15	\$871,605
9 to 12 (61 to 90)	31,033	\$25	\$775,828
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37 to 42 (271 to 315)	1,425	\$100	\$142,500
<b>TOTALS:</b>	<b>827,828</b>		<b>\$7,183,285</b>

- 827,828 violations of WAC 480-120-411 for failing to provide adequate maintenance to ensure that all facilities are in safe and serviceable condition, failing to immediately correct conditions endangering continuity of service, and failing to promptly repair or replace broken, damaged, or deteriorated equipment when found to no longer be capable of providing adequate service. Staff’s penalty recommendation is based on an escalating methodology based on length of time the violations existed for the infrastructure violations. Staff breaks the violations into four-week increments. The penalties range from \$5 to \$100 per violation as follows, and totals \$7,183,285:

<b>Weeks (Days)</b>	<b>Violations</b>	<b>Penalty per violation</b>	<b>Total penalty</b>
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37 to 42 (271 to 315)	1,425	\$100	\$142,500
<b>TOTALS:</b>	<b>827,828</b>		<b>\$7,183,285</b>

- \$150 for each of the 8,008 violations of WAC 480-120-166 for failing to thoroughly investigate all issues raised in a commission-referred complaint and provide a complete report of the results of its investigation to the commission, and for failing to respond to urgent complaints within two business days and to respond to Staff’s requests for additional information within three business days. The penalty recommendation for these violations is \$1,201,200.



**STATE OF WASHINGTON**  
**UTILITIES AND TRANSPORTATION COMMISSION**

*621 Woodland Square Loop S.E. • Lacey, Washington 98503*

*P.O. Box 47250 • Olympia, Washington 98504-7250*

*(360) 664-1160 • TTY 1-800-833-6384 or 711*

March 12, 2024

Sent via email and first-class mail.

Robert Thoms  
Director, Washington State Government Affairs and Public Policy  
CenturyLink Communications LLC  
120 Lenora St, Suite 502  
Seattle, WA 98121

Dear Robert Thoms:

The Utilities and Transportation Commission is investigating the business practices of CenturyLink Communications LLC (Company), including Lumen Technologies Group, Qwest Corporation, CenturyTel of Washington, Inc., CenturyTel of Inter Island, Inc., CenturyTel of Cowiche, and United Telephone Company of the Northwest. The investigation is focused on quality of service, including but not limited to line quality, line maintenance, outages, interruptions, restoration times, and the Company's responsiveness.

Under Washington state law, RCW 80.04.070, commission staff have the right, at any and all times, to inspect the accounts, books, papers, and documents of any public service company doing business in this state.

In order to complete this investigation commission staff requires the following documents and information:

**Organizational Chart:**

1. Please provide a corporate organizational chart showing the relationship of the following entities. If any of the entity names have been updated or changed, please identify the old name and the new name and explain.
  - a. CenturyLink Communications LLC d/b/a Lumen Technologies Group
  - b. Qwest Corporation
  - c. CenturyTel of Washington, Inc.
  - d. CenturyTel of Inter Island, Inc.
  - e. CenturyTel of Cowiche
  - f. United Telephone Company of the Northwest

**Maintenance and Repair Policies:**

2. Staff would like to understand the maintenance and repair schedules used by CenturyLink Communications LLC d/b/a Lumen Technologies Group; Qwest Corporation; CenturyTel of Washington, Inc.; CenturyTel of Inter Island, Inc.; CenturyTel of Cowiche; and United Telephone Company of the Northwest.
  - a) Please provide copies of the maintenance and repair policies for each entity.
  - b) For each entity, identify who is responsible for implementing and overseeing the maintenance and repair policies by name and job title and explain the duties and responsibilities of each person identified.
  - c) Explain whether the entities have complied with the applicable company policy from January 1, 2023, to present. If there are variances between the maintenance and repair policies and each entities' practices, please explain with particularity the difference and the reasons for the differences.

**Broken, Damaged, and Deteriorated Equipment:**

3. From January 1, 2023, to present, please describe how CenturyLink Communications LLC d/b/a Lumen Technologies Group detects broken, damaged, or deteriorated equipment. Please also provide the following:
  - a) How the company decides when to address broken, damaged, or deteriorated equipment.
  - b) Describe the instances in which broken, damaged, or deteriorated equipment was discovered, including the date, type of equipment, and how each instance was addressed.
4. From January 1, 2023, to present, please describe how Qwest Corporation detects broken, damaged, or deteriorated equipment. Please also provide the following:
  - a) How the company decides when to address broken, damaged, or deteriorated equipment.
  - b) Describe the instances in which broken, damaged, or deteriorated equipment was discovered, including the date, type of equipment, and how each instance was addressed.
5. From January 1, 2023, to present, please describe how CenturyTel of Washington, Inc. detects broken, damaged, or deteriorated equipment. Please also provide the following:
  - a) How the company decides when to address broken, damaged, or deteriorated equipment.
  - b) Describe the instances in which broken, damaged, or deteriorated equipment was discovered, including the date, type of equipment, and how each instance was addressed.
6. From January 1, 2023, to present, please describe how CenturyTel of Inter Island, Inc. detects broken, damaged, or deteriorated equipment. Please also provide the following:
  - a) How the company decides when to address broken, damaged, or deteriorated equipment.

- b) Describe the instances in which broken, damaged, or deteriorated equipment was discovered, including the date, type of equipment, and how each instance was addressed.
7. From January 1, 2023, to present, please describe how CenturyTel of Cowiche detects broken, damaged, or deteriorated equipment. Please also provide the following:
- a) How the company decides when to address broken, damaged, or deteriorated equipment.
  - b) Describe the instances in which broken, damaged, or deteriorated equipment was discovered, including the date, type of equipment, and how each instance was addressed.
8. From January 1, 2023, to present, please describe how United Telephone Company of the Northwest detects broken, damaged, or deteriorated equipment. Please also provide the following:
- a) How the company decides when to address broken, damaged, or deteriorated equipment.
  - b) Describe the instances in which broken, damaged, or deteriorated equipment was discovered, including the date, type of equipment, and how each instance was addressed.

**Line Quality Testing:**

9. From January 1, 2023, to present, please describe the type and frequency of line quality testing conducted by CenturyLink Communications LLC d/b/a Lumen Technologies Group. Please also provide the following:
- a) Identify the number of tests conducted.
  - b) The dates the tests were conducted.
  - c) The results of the tests.
  - d) Any actions taken as a result of the tests.
10. From January 1, 2023, to present, please describe the type and frequency of line quality testing conducted by Qwest Corporation. Please also provide the following:
- a) Identify the number of tests conducted.
  - b) The dates the tests were conducted.
  - c) The results of the tests.
  - d) Any actions taken as a result of the tests.
11. From January 1, 2023, to present, please describe the type and frequency of line quality testing conducted by CenturyTel of Washington, Inc. Please also provide the following:
- a) Identify the number of tests conducted.
  - b) The dates the tests were conducted.
  - c) The results of the tests.
  - d) Any actions taken as a result of the tests.



12. From January 1, 2023, to present, please describe the type and frequency of line quality testing conducted by CenturyTel of Inter Island, Inc. Please also provide the following:
  - a) Identify the number of tests conducted.
  - b) The dates the tests were conducted.
  - c) The results of the tests.
  - d) Any actions taken as a result of the tests.
  
13. From January 1, 2023, to present, please describe the type and frequency of line quality testing conducted by CenturyTel of Cowiche. Please also provide the following:
  - a) Identify the number of tests conducted.
  - b) The dates the tests were conducted.
  - c) The results of the tests.
  - d) Any actions taken as a result of the tests.
  
14. From January 1, 2023, to present, please describe the type and frequency of line quality testing conducted by United Telephone Company of the Northwest. Please also provide the following:
  - a) Identify the number of tests conducted.
  - b) The dates the tests were conducted.
  - c) The results of the tests.
  - d) Any actions taken as a result of the tests.

**Test Apparatus:**

15. WAC 480-120-411 requires companies to "install and maintain test apparatus at appropriate locations to determine the operating characteristics of network systems." From January 1, 2023, to present, please provide the following information for CenturyLink Communications LLC d/b/a Lumen Technologies Group:
  - a) Describe the test apparatus and locations installed.
  - b) Describe what the test apparatus measures.
  - c) State how often the test apparatus is used.
  - d) Describe all actions taken as a result using the test apparatus.
  
16. WAC 480-120-411 requires companies to "install and maintain test apparatus at appropriate locations to determine the operating characteristics of network systems." From January 1, 2023, to present, please provide the following information for Qwest Corporation:
  - a) Describe the test apparatus and locations installed.
  - b) Describe what the test apparatus measures.
  - c) State how often the test apparatus is used.
  - d) Describe all actions taken as a result using the test apparatus.
  
17. WAC 480-120-411 requires companies to "install and maintain test apparatus at appropriate locations to determine the operating characteristics of network systems."

From January 1, 2023, to present, please provide the following information for CenturyTel of Washington, Inc.:

- a) Describe the test apparatus and locations installed.
- b) Describe what the test apparatus measures.
- c) State how often the test apparatus is used.
- d) Describe all actions taken as a result using the test apparatus.

18. WAC 480-120-411 requires companies to "install and maintain test apparatus at appropriate locations to determine the operating characteristics of network systems." From January 1, 2023, to present, please provide the following information for CenturyTel of Inter Island, Inc.:

- a) Describe the test apparatus and locations installed.
- b) Describe what the test apparatus measures.
- c) State how often the test apparatus is used.
- d) Describe all actions taken as a result using the test apparatus.

19. WAC 480-120-411 requires companies to "install and maintain test apparatus at appropriate locations to determine the operating characteristics of network systems." From January 1, 2023, to present, please provide the following information for CenturyTel of Cowiche:

- a) Describe the test apparatus and locations installed.
- b) Describe what the test apparatus measures.
- c) State how often the test apparatus is used.
- d) Describe all actions taken as a result using the test apparatus.

20. WAC 480-120-411 requires companies to "install and maintain test apparatus at appropriate locations to determine the operating characteristics of network systems." From January 1, 2023, to present, please provide the following information for United Telephone Company of the Northwest:

- a) Describe the test apparatus and locations installed.
- b) Describe what the test apparatus measures.
- c) State how often the test apparatus is used.
- d) Describe all actions taken as a result using the test apparatus.

**Monitoring Network Performance:**

21. For equipment that CenturyLink Communications LLC d/b/a Lumen Technologies Group owns, operates, or shares, provide the following information:

- a) How the company monitors network performance.
- b) State the frequency at which the network performance is monitored.
- c) Describe any action taken as a result of the network performance monitoring.

22. For equipment that Qwest Corporation owns, operates, or shares, provide the following information:

- a) How the company monitors network performance.

- b) State the frequency at which the network performance is monitored.
  - c) Describe any action taken as a result of the network performance monitoring.
23. For equipment that CenturyTel of Washington, Inc. owns, operates, or shares, provide the following information:
- a) How the company monitors network performance.
  - b) State the frequency at which the network performance is monitored.
  - c) Describe any action taken as a result of the network performance monitoring.
24. For equipment that CenturyTel of Inter Island, Inc. owns, operates, or shares, provide the following information:
- a) How the company monitors network performance.
  - b) State the frequency at which the network performance is monitored.
  - c) Describe any action taken as a result of the network performance monitoring.
25. For equipment that CenturyTel of Cowiche owns, operates, or shares, provide the following information:
- a) How the company monitors network performance.
  - b) State the frequency at which the network performance is monitored.
  - c) Describe any action taken as a result of the network performance monitoring.
26. For equipment that United Telephone Company of the Northwest owns, operates, or shares, provide the following information:
- a) How the company monitors network performance.
  - b) State the frequency at which the network performance is monitored.
  - c) Describe any action taken as a result of the network performance monitoring.

**Routine and Emergency Repairs:**

27. When routine or emergency repairs are necessary, what type of supplies and materials does CenturyLink Communications LLC d/b/a Lumen Technologies Group have readily available? Please also provide the following:
- a) Please explain the company's policy regarding what supplies to store versus what supplies to order as needed.
  - b) Please explain the company's policy regarding the amount of supplies stored.
  - c) Please provide copies of the policies described in your response.
28. When routine or emergency repairs are necessary, what type of supplies and materials does Qwest Corporation have readily available? Please also provide the following:
- a) Please explain the company's policy regarding what supplies to store versus what supplies to order as needed.
  - b) Please explain the company's policy regarding the amount of supplies stored.
  - c) Please provide copies of the policies described in your response.

29. When routine or emergency repairs are necessary, what type of supplies and materials does CenturyTel of Washington, Inc. have readily available? Please also provide the following:
  - a) Please explain the company's policy regarding what supplies to store versus what supplies to order as needed.
  - b) Please explain the company's policy regarding the amount of supplies stored.
  - c) Please provide copies of the policies described in your response.
  
30. When routine or emergency repairs are necessary, what type of supplies and materials does CenturyTel of Inter Island, Inc. have readily available? Please also provide the following:
  - a) Please explain the company's policy regarding what supplies to store versus what supplies to order as needed.
  - b) Please explain the company's policy regarding the amount of supplies stored.
  - c) Please provide copies of the policies described in your response.
  
31. When routine or emergency repairs are necessary, what type of supplies and materials does CenturyTel of Cowiche have readily available? Please also provide the following:
  - a) Please explain the company's policy regarding what supplies to store versus what supplies to order as needed.
  - b) Please explain the company's policy regarding the amount of supplies stored.
  - c) Please provide copies of the policies described in your response.
  
32. When routine or emergency repairs are necessary, what type of supplies and materials does United Telephone Company of the Northwest have readily available? have readily available? Please also provide the following:
  - a) Please explain the company's policy regarding what supplies to store versus what supplies to order as needed.
  - b) Please explain the company's policy regarding the amount of supplies stored.
  - c) Please provide copies of the policies described in your response.
  
33. From January 1, 2023, to present, please identify routine and emergency repairs conducted by CenturyLink Communications LLC d/b/a Lumen Technologies Group. For each repair, provide the following information:
  - a) Identify the reason for the repair.
  - b) State how long it took to complete the repair.
  - c) Describe any impacts on service.
  - d) State the number of customers impacted.
  
34. From January 1, 2023, to present, please identify routine and emergency repairs conducted by Qwest Corporation. For each repair, provide the following information:
  - a) Identify the reason for the repair.
  - b) State how long it took to complete the repair.
  - c) Describe any impacts on service.

- d) State the number of customers impacted.
35. From January 1, 2023, to present, please identify routine and emergency repairs conducted by CenturyTel of Washington, Inc. For each repair, provide the following information:
- Identify the reason for the repair.
  - State how long it took to complete the repair.
  - Describe any impacts on service.
  - State the number of customers impacted.
36. From January 1, 2023, to present, please identify routine and emergency repairs conducted by CenturyTel of Inter Island, Inc. For each repair, provide the following information:
- Identify the reason for the repair.
  - State how long it took to complete the repair.
  - Describe any impacts on service.
  - State the number of customers impacted.
37. From January 1, 2023, to present, please identify routine and emergency repairs conducted by CenturyTel of Cowiche. For each repair, provide the following information:
- Identify the reason for the repair.
  - State how long it took to complete the repair.
  - Describe any impacts on service.
  - State the number of customers impacted.
38. From January 1, 2023, to present, please identify routine and emergency repairs conducted by United Telephone Company of the Northwest. For each repair, provide the following information:
- Identify the reason for the repair.
  - State how long it took to complete the repair.
  - Describe any impacts on service.
  - State the number of customers impacted.

**Customer Complaints:**

39. From January 1, 2023, to present, please identify the number of customer complaints received regarding service quality by CenturyLink Communications LLC d/b/a Lumen Technologies Group. For each complaint, provide the following information:
- Provide the date the complaint was received.
  - Describe the subject of the complaint.
  - Indicate if the complaint originated from a customer, the commission, or what other entity made the complaint.
  - Provide a copy of the investigation into the complaint.
  - Describe the resolution of the complaint.
  - Provide the date the complaint was resolved.

40. From January 1, 2023, to present, please identify the number of customer complaints received regarding service quality by Qwest Corporation. For each complaint, provide the following information:
- a) Provide the date the complaint was received.
  - b) Describe the subject of the complaint.
  - c) Indicate if the complaint originated from a customer, the commission, or what other entity made the complaint.
  - d) Provide a copy of the investigation into the complaint.
  - e) Describe the resolution of the complaint.
  - f) Provide the date the complaint was resolved.
41. From January 1, 2023, to present, please identify the number of customer complaints received regarding service quality by CenturyTel of Washington, Inc. For each complaint, provide the following information:
- a) Provide the date the complaint was received.
  - b) Describe the subject of the complaint.
  - c) Indicate if the complaint originated from a customer, the commission, or what other entity made the complaint.
  - d) Provide a copy of the investigation into the complaint.
  - e) Describe the resolution of the complaint.
  - f) Provide the date the complaint was resolved.
42. From January 1, 2023, to present, please identify the number of customer complaints received regarding service quality by CenturyTel of Inter Island, Inc. For each complaint, provide the following information:
- a) Provide the date the complaint was received.
  - b) Describe the subject of the complaint.
  - c) Indicate if the complaint originated from a customer, the commission, or what other entity made the complaint.
  - d) Provide a copy of the investigation into the complaint.
  - e) Describe the resolution of the complaint.
  - f) Provide the date the complaint was resolved.
43. From January 1, 2023, to present, please identify the number of customer complaints received regarding service quality by CenturyTel of Cowiche. For each complaint, provide the following information:
- a) Provide the date the complaint was received.
  - b) Describe the subject of the complaint.
  - c) Indicate if the complaint originated from a customer, the commission, or what other entity made the complaint.
  - d) Provide a copy of the investigation into the complaint.
  - e) Describe the resolution of the complaint.
  - f) Provide the date the complaint was resolved.

44. From January 1, 2023, to present, please identify the number of customer complaints received regarding service quality by United Telephone Company of the Northwest. For each complaint, provide the following information:
- a) Provide the date the complaint was received.
  - b) Describe the subject of the complaint.
  - c) Indicate if the complaint originated from a customer, the commission, or what other entity made the complaint.
  - d) Provide a copy of the investigation into the complaint.
  - e) Describe the resolution of the complaint.
  - f) Provide the date the complaint was resolved.

**Outages and Interruptions:**

45. Please explain with particularity how CenturyLink Communications LLC d/b/a Lumen Technologies Group detects service outages and service interruptions.
46. Please explain with particularity how Qwest Corporation detects service outages and service interruptions.
47. Please explain with particularity how CenturyTel of Washington, Inc. detects service outages and service interruptions.
48. Please explain with particularity how CenturyTel of Inter Island, Inc. detects service outages and service interruptions.
49. Please explain with particularity how CenturyTel of Cowiche detects service outages and service interruptions.
50. Please explain with particularity how United Telephone Company of the Northwest detects service outages and service interruptions.
51. From January 1, 2023, to present, please identify the number of service outages, including major outages, experienced by CenturyLink Communications LLC d/b/a Lumen Technologies Group For each outage, please identify the following:
- a) The cause of the outage.
  - b) The date the outage began.
  - c) The date the outage was resolved.
  - d) The number of minutes and days the outage lasted.
  - e) What was done to resolve the outage.
  - f) The total number of customers impacted.
52. From January 1, 2023, to present, please identify number of service outages, including major outages, experienced by Qwest Corporation. For each outage, please identify the following:

- a) The cause of the outage.
  - b) The date the outage began.
  - c) The date the outage was resolved.
  - d) The number of minutes and days the outage lasted.
  - e) What was done to resolve the outage.
  - f) The total number of customers impacted.
53. From January 1, 2023, to present, please identify number of service outages, including but not limited to major outages, experienced by CenturyTel of Washington, Inc. For each outage, please identify the following:
- a) The cause of the outage.
  - b) The date the outage began.
  - c) The date the outage was resolved.
  - d) The number of minutes and days the outage lasted.
  - e) What was done to resolve the outage.
  - f) The total number of customers impacted.
54. From January 1, 2023, to present, please identify number of service outages, including but not limited to major outages, experienced by CenturyTel of Inter Island, Inc. For each outage, please identify the following:
- a) The cause of the outage.
  - b) The date the outage began.
  - c) The date the outage was resolved.
  - d) The number of minutes and days the outage lasted.
  - e) What was done to resolve the outage.
  - f) The total number of customers impacted.
55. From January 1, 2023, to present, please identify number of service outages, including but not limited to major outages, experienced by CenturyTel of Cowiche. For each outage, please identify the following:
- a) The cause of the outage.
  - b) The date the outage began.
  - c) The date the outage was resolved.
  - d) The number of minutes and days the outage lasted.
  - e) What was done to resolve the outage.
  - f) The total number of customers impacted.
56. From January 1, 2023, to present, please identify the number of service outages, including but not limited to major outages, experienced by United Telephone Company of the Northwest. For each outage, please identify the following:
- a) The cause of the outage.
  - b) The date the outage began.
  - c) The date the outage was resolved.
  - d) The number of minutes and days the outage lasted.



- e) What was done to resolve the outage.
  - f) The total number of customers impacted.
57. From January 1, 2023, to present, please identify the number of service interruptions experienced by CenturyLink Communications LLC d/b/a Lumen Technologies Group For each interruption, please identify the following:
- a) The cause of the interruption.
  - b) The date the interruption began.
  - c) The date the interruption was resolved.
  - d) The number of minutes and days the interruption lasted.
  - e) What was done to resolve the interruption.
  - f) The total number of customers impacted.
58. From January 1, 2023, to present, please identify number of service interruptions experienced by Qwest Corporation. For each interruption, please identify the following:
- a) The cause of the interruption.
  - b) The date the interruption began.
  - c) The date the interruption was resolved.
  - d) The number of minutes and days the interruption lasted.
  - e) What was done to resolve the interruption.
  - f) The total number of customers impacted.
59. From January 1, 2023, to present, please identify number of service interruption experienced by CenturyTel of Washington, Inc. For each interruption, please identify the following:
- a) The cause of the interruption.
  - b) The date the interruption began.
  - c) The date the interruption was resolved.
  - d) The number of minutes and days the interruption lasted.
  - e) What was done to resolve the interruption.
  - f) The total number of customers impacted.
60. From January 1, 2023, to present, please identify number of service interruption experienced by CenturyTel of Inter Island, Inc. For each interruption, please identify the following:
- a) The cause of the interruption.
  - b) The date the interruption began.
  - c) The date the interruption was resolved.
  - d) The number of minutes and days the interruption lasted.
  - e) What was done to resolve the interruption.
  - f) The total number of customers impacted.

61. From January 1, 2023, to present, please identify number of service interruption experienced by CenturyTel of Cowiche. For each interruption, please identify the following:
- The cause of the interruption.
  - The date the interruption began.
  - The date the interruption was resolved.
  - The number of minutes and days the interruption lasted.
  - What was done to resolve the interruption.
  - The total number of customers impacted.
62. From January 1, 2023, to present, please identify the number of service interruption experienced by United Telephone Company of the Northwest. For each interruption, please identify the following:
- The cause of the interruption.
  - The date the interruption began.
  - The date the interruption was resolved.
  - The number of minutes and days the interruption lasted.
  - What was done to resolve the interruption.
  - The total number of customers impacted.
63. For all of the service outages and service interruptions identified in your answers to Data Requests 63 through 74, please provide the following information:
- State when restoration of services was delayed due to not having the equipment necessary to resolve the outage or interruption.
  - State when restoration of services was delayed due to not having the materials necessary to resolve the outage or interruption.
  - State when restoration of services was delayed due to not having the available personnel necessary to resolve the outage or interruption.
  - State what the issue was that caused the delay in resolving the outage or interruption.
  - Quantify the length of time of the delay.

### **Battery and Power backup**

64. From January 1, 2023, to present, for CenturyLink Communications LLC d/b/a Lumen Technologies Group, please provide the following regarding offices which are equipped with automatic start generators:
- How many offices are equipped with automatic start generators, and where are they located?
  - How many have three or more hours of reserve battery capacity?
  - If there are any locations without three or more hours of reserve battery capacity, identify those locations.
  - How do you identify a battery failure?
  - What is the maintenance schedule for the batteries?

65. From January 1, 2023, to present, for Qwest Corporation, please provide the following regarding offices which are equipped with automatic start generators:
- a) How many offices are equipped with automatic start generators, and where are they located?
  - b) How many have three or more hours of reserve battery capacity?
  - c) If there are any locations without three or more hours of reserve battery capacity, identify those locations.
  - d) How do you identify a battery failure?
  - e) What is the maintenance schedule for the batteries?
66. From January 1, 2023, to present, for CenturyTel of Washington, please provide the following regarding offices which are equipped with automatic start generators:
- a) How many offices are equipped with automatic start generators, and where are they located?
  - b) How many have three or more hours of reserve battery capacity?
  - c) If there are any locations without three or more hours of reserve battery capacity, identify those locations.
  - d) How do you identify a battery failure?
  - e) What is the maintenance schedule for the batteries?
67. From January 1, 2023, to present, for CenturyTel of Inter Island, Inc., please provide the following regarding offices which are equipped with automatic start generators:
- a) How many offices are equipped with automatic start generators, and where are they located?
  - b) How many have three or more hours of reserve battery capacity?
  - c) If there are any locations without three or more hours of reserve battery capacity, identify those locations.
  - d) How do you identify a battery failure?
  - e) What is the maintenance schedule for the batteries?
68. From January 1, 2023, to present, for CenturyTel of Cowiche, please provide the following regarding offices which are equipped with automatic start generators:
- a) How many offices are equipped with automatic start generators, and where are they located?
  - b) How many have three or more hours of reserve battery capacity?
  - c) If there are any locations without three or more hours of reserve battery capacity, identify those locations.
  - d) How do you identify a battery failure?
  - e) What is the maintenance schedule for the batteries?
69. From January 1, 2023, to present, for United Telephone Company of the Northwest, please provide the following regarding offices which are equipped with automatic start generators:

- a) How many offices are equipped with automatic start generators, and where are they located?
  - b) How many have three or more hours of reserve battery capacity?
  - c) If there are any locations without three or more hours of reserve battery capacity, identify those locations.
  - d) How do you identify a battery failure?
  - e) What is the maintenance schedule for the batteries?
70. From January 1, 2023, to present, for CenturyLink Communications LLC d/b/a Lumen Technologies Group, please provide the following regarding offices which are not equipped with automatic start generators:
- a) How many offices are not equipped with automatic start generators, and where are they located?
  - b) How many have five or more hours of reserve battery capacity?
  - c) If there are any locations without three or more hours of reserve battery capacity, identify those locations.
  - d) How do you identify a battery failure?
  - e) What is the maintenance schedule for the batteries?
71. From January 1, 2023, to present, for Qwest Corporation, please provide the following regarding offices which are not equipped with automatic start generators:
- a) How many offices are not equipped with automatic start generators, and where are they located?
  - b) How many have five or more hours of reserve battery capacity?
  - c) If there are any locations without three or more hours of reserve battery capacity, identify those locations.
  - d) How do you identify a battery failure?
72. What is the maintenance schedule for the batteries?
73. From January 1, 2023, to present, for CenturyTel of Washington, please provide the following regarding offices which are not equipped with automatic start generators:
- a) How many offices are not equipped with automatic start generators, and where are they located?
  - b) How many have five or more hours of reserve battery capacity?
  - c) If there are any locations without three or more hours of reserve battery capacity, identify those locations.
  - d) How do you identify a battery failure?
  - e) What is the maintenance schedule for the batteries?
74. From January 1, 2023, to present, for CenturyTel of Inter Island, Inc., please provide the following regarding offices which are not equipped with automatic start generators:
- a) How many offices are not equipped with automatic start generators, and where are they located?
  - b) How many have five or more hours of reserve battery capacity?

- c) If there are any locations without three or more hours of reserve battery capacity, identify those locations.
  - d) How do you identify a battery failure?
  - e) What is the maintenance schedule for the batteries?
75. From January 1, 2023, to present, for CenturyTel of Cowiche, please provide the following regarding offices which are not equipped with automatic start generators:
- a) How many offices are not equipped with automatic start generators, and where are they located?
  - b) How many have five or more hours of reserve battery capacity?
  - c) If there are any locations without three or more hours of reserve battery capacity, identify those locations.
  - d) How do you identify a battery failure?
  - e) What is the maintenance schedule for the batteries?
76. From January 1, 2023, to present, for United Telephone Company of the Northwest, please provide the following regarding offices which are not equipped with automatic start generators:
- a) How many offices are not equipped with automatic start generators, and where are they located?
  - b) How many have five or more hours of reserve battery capacity?
  - c) If there are any locations without three or more hours of reserve battery capacity, identify those locations.
  - d) How do you identify a battery failure?
  - e) What is the maintenance schedule for the batteries?
77. From January 1, 2023, to present, for CenturyLink Communications LLC d/b/a Lumen Technologies Group, please provide the following regarding offices which are not equipped with permanently installed emergency power facilities:
- a) How many offices are not equipped with permanently installed emergency power facilities, and where are they located?
  - b) Describe with particularity the power capacity to carry the load accessed by each office in an emergency?
  - c) How many portable generators does the company have, and where are they located?
  - d) Explain with particularity how the number of portable generators is sufficient to maintain peripheral electronic equipment in an emergency?
  - e) How long does it take to connect the generators for peripheral electronic equipment to the system: from initial power outage to operation status for each office?
78. From January 1, 2023, to present, for Qwest Corporation, please provide the following regarding offices which are not equipped with permanently installed emergency power facilities:
- a) How many offices are not equipped with permanently installed emergency power facilities, and where are they located?

- b) Describe with particularity the power capacity to carry the load accessed by each office in an emergency?
  - c) How many portable generators does the company have, and where are they located?
  - d) Explain with particularity how the number of portable generators is sufficient to maintain peripheral electronic equipment in an emergency?
  - e) How long does it take to connect the generators for peripheral electronic equipment to the system: from initial power outage to operation status for each office?
79. From January 1, 2023, to present, for CenturyTel of Washington, please provide the following regarding offices which are not equipped with permanently installed emergency power facilities:
- a) How many offices are not equipped with permanently installed emergency power facilities, and where are they located?
  - b) Describe with particularity the power capacity to carry the load accessed by each office in an emergency?
  - c) How many portable generators does the company have, and where are they located?
  - d) Explain with particularity how the number of portable generators is sufficient to maintain peripheral electronic equipment in an emergency?
  - e) How long does it take to connect the generators for peripheral electronic equipment to the system: from initial power outage to operation status for each office?
80. From January 1, 2023, to present, for CenturyTel of Inter Island, Inc., please provide the following regarding offices which are not equipped with permanently installed emergency power facilities:
- a) How many offices are not equipped with permanently installed emergency power facilities, and where are they located?
  - b) Describe with particularity the power capacity to carry the load accessed by each office in an emergency?
  - c) How many portable generators does the company have, and where are they located?
  - d) Explain with particularity how the number of portable generators is sufficient to maintain peripheral electronic equipment in an emergency?
  - e) How long does it take to connect the generators for peripheral electronic equipment to the system: from initial power outage to operation status for each office?
81. From January 1, 2023, to present, for CenturyTel of Cowiche, please provide the following regarding offices which are not equipped with permanently installed emergency power facilities:
- a) How many offices are not equipped with permanently installed emergency power facilities, and where are they located?
  - b) Describe with particularity the power capacity to carry the load accessed by each office in an emergency?

- c) How many portable generators does the company have, and where are they located?
- d) Explain with particularity how the number of portable generators is sufficient to maintain peripheral electronic equipment in an emergency?
- e) How long does it take to connect the generators for peripheral electronic equipment to the system: from initial power outage to operation status for each office?

82. From January 1, 2023, to present, for United Telephone Company of the Northwest, please provide the following regarding offices which are not equipped with permanently installed emergency power facilities:

- a) How many offices are not equipped with permanently installed emergency power facilities, and where are they located?
- b) Describe with particularity the power capacity to carry the load accessed by each office in an emergency?
- c) How many portable generators does the company have, and where are they located?
- d) Explain with particularity how the number of portable generators is sufficient to maintain peripheral electronic equipment in an emergency?
- e) How long does it take to connect the generators for peripheral electronic equipment to the system: from initial power outage to operation status for each office?

All requested information should be grouped by data request question number, letter, and in chronological order, clearly indicating the question it is in response to.

Please provide all requested information no later than March 26, 2024, in electronic format using Microsoft Word for narrative responses, Excel for data, and PDF for copies of documents. Extension requests may be granted on a case-by-case basis. A request for an extension must be made in writing prior to the deadline and must include the reason for the extension.

The response should be directed to Jack Graham, Compliance Investigations. Please include a copy of this letter with your response. If you have questions regarding this request, please contact Jack Graham at (360) 664-1143 or email [Jack.Graham@utc.wa.gov](mailto:Jack.Graham@utc.wa.gov).

Sincerely,

**Jeff Killip**  
Digitally signed by Jeff Killip  
Date: 2024.03.08 10:09:17 -08'00'

Jeff Killip  
Executive Director and Secretary

**BEFORE THE WASHINGTON  
UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of  
Amending and Repealing certain rules in

WAC 480-120

Relating to  
The Washington Telephone Assistance  
Plan (WTAP) and to the Washington  
Exchange Carriers Association (WECA)

DOCKET UT-160196

GENERAL ORDER R-587

ORDER REPEALING AND  
AMENDING RULES  
PERMANENTLY

1     **STATUTORY OR OTHER AUTHORITY:** The Washington Utilities and  
Transportation Commission (Commission) takes this action under Notice WSR # 16-11-  
096, filed with the Code Reviser on May 18, 2016. The Commission has authority to take  
this action pursuant to RCW 80.01.040, RCW 80.04.160, RCW 80.36.135 and RCW  
80.36.440.

2     **STATEMENT OF COMPLIANCE:** This proceeding complies with the Administrative  
Procedure Act (RCW 34.05), the State Register Act (RCW 34.08), the State  
Environmental Policy Act of 1971 (RCW 43.21C), and the Regulatory Fairness Act  
(RCW 19.85).

3     **DATE OF ADOPTION:** The Commission adopts this rule on the date this Order is  
entered.

4     **CONCISE STATEMENT OF PURPOSE AND EFFECT OF THE RULE:** RCW  
34.05.325(6) requires the Commission to prepare and publish a concise explanatory  
statement about an adopted rule. The statement must identify the Commission's reasons  
for adopting the rule, describe the differences between the version of the proposed rules  
published in the register and the rules adopted (other than editing changes), summarize  
the comments received regarding the proposed rule changes, and state the Commission's  
responses to the comments reflecting the Commission's consideration of them.

5

OFFICE OF THE CODE REVISER STATE OF WASHINGTON FILED <b>DATE: September 22, 2016</b> <b>TIME: 8:50 AM</b> <b>WSR 16-20-003</b>
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To avoid unnecessary duplication in the record of this docket, the Commission designates the discussion in this Order, including appendices, as its concise explanatory statement. This Order provides a complete but concise explanation of the agency's actions and its reasons for taking those actions.

6 **REFERENCE TO AFFECTED RULES:** This Order amends and repeals the following sections of the Washington Administrative Code:

Amend	WAC 480-120-121	Definitions.
Amend	WAC 480-120-061	Refusing service.
Amend	WAC 480-120-103	Application for service.
Amend	WAC 480-120-174	Payment arrangements.
Repeal	WAC 480-120-259	Washington telephone assistance program
Repeal	WAC 480-120-352	Washington Exchange Carrier Association

7 **PREPROPOSAL STATEMENT OF INQUIRY AND ACTIONS THEREUNDER:**  
The Commission filed a Preproposal Statement of Inquiry (CR-101) on March 2, 2016, at WSR # 16-06-119.

8 The statement advised interested persons that the Commission was considering entering a rulemaking as a follow up to the rulemaking in Docket UT-140680. The Commission repealed WAC 480-120-440 in that proceeding, and the rule contained important service outage restoral requirements, as well as notice requirements related to planned outages. Other rules in WAC 480-120 contain cross-references to rules that were repealed. The Washington Telephone Assistance Program (WTAP) no longer exists, and rules related to that program are moot. Similarly, the Washington Exchange Carrier Association (WECA) has been discontinued because the Commission now handles WECA's primary function of administering a universal service fund pursuant to rules in WAC chapter 480-123, so WAC 480-120-352 is unnecessary. The Commission also informed persons of this inquiry by providing notice of the subject and the CR-101 to everyone on the Commission's list of persons requesting such information pursuant to RCW 34.05.320(3) and by sending notice to all parties interested in the previous rulemaking docket UT-140680, all registered telecommunications companies, and the Commission's list of telecommunications attorneys. Pursuant to the notice, the Commission received written comments on April 4, 2016.

9 **NOTICE OF PROPOSED RULEMAKING:** The Commission filed a notice of Proposed Rulemaking (CR-102) on May 18, 2016, at WSR #16-11-096. The Commission scheduled this matter for oral comment and adoption under Notice WSR #16-11-096 at

9:30 a.m., Tuesday, July 12, 2016, in the Commission's Hearing Room, Second Floor, Richard Hemstad Building, 1300 S. Evergreen Park Drive S.W., Olympia, Washington. The date of the hearing was subsequently changed to Monday, July 18, 2016, under Notice WSR #16-13-097. The Notice provided interested persons the opportunity to submit written comments to the Commission.

- 10 **WRITTEN COMMENTS:** The Commission received written comments from the Washington Independent Telecommunications Association (WITA), Frontier Communications NW, Inc. (Frontier), and CenturyLink. Summaries of all written comments and Commission Staff's responses are contained in the Commission staff (Staff) memorandum included in Appendix A, attached to, and made part of, this Order.
- 11 **RULEMAKING HEARING:** The Commission considered the proposed rules for adoption at a rulemaking hearing on Monday, July 18, 2016, before Chairman David W. Danner, Commissioner Philip B. Jones, and Commissioner Ann E. Rendahl. The Commission heard oral comments from Staff, CenturyLink, Frontier, and WITA, all of which repeated and expanded on the written comments.
- 12 **SUGGESTIONS FOR CHANGE THAT ARE REJECTED/ACCEPTED:** Written and oral comments suggested changes to the proposed rules. The suggested changes and Staff's response are included in Appendix A. The Commission agrees with and adopts the responses to the suggested changes in that appendix except with respect to adoption of WAC 480-120-441.<sup>1</sup> The Commission concurs with CenturyLink, Frontier, and WITA that the Commission should not adopt that rule at this time.
- 13 The Commission agrees with the commenters that the record in Docket UT-140680 does not support the conclusion that the Commission inadvertently repealed WAC 480-120-440 in that prior rulemaking. The adoption order identifies, although does not discuss, that rule, and Staff included the rule in its original proposal and responded to comments from one commenter who objected to the rule's repeal. The Commission may not have fully considered the impact of repealing that rule, but we cannot say that its repeal was due to a ministerial error. Accordingly, we must determine whether the record demonstrates a need to readopt that rule.<sup>2</sup> We conclude that it does not.

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<sup>1</sup> The Commission also modifies for clarity the revised language WITA proposed to the definition of "Order date" in WAC 480-120-021.

<sup>2</sup> CenturyLink observes that the CR 101 expressly states that the Commission proposed to readopt WAC 480-120-440 because the Commission inadvertently repealed it, but CenturyLink concedes

- 14 CenturyLink, Frontier, and WITA contend that readopting WAC 480-120-440 is inconsistent with the Commission's past recognition of the competitiveness of the telecommunications market in Washington. Frontier and CenturyLink point to the Commission's grant of minimal or reduced regulation for both companies and to the lack of any Commission oversight over wireless and voice over Internet protocol (VoIP) companies. These commenters argue that the legacy restrictions in WAC 480-120-441 are unnecessary when dissatisfied customers have the option to obtain service from other providers and that adoption of that rule would unfairly hobble them but not their competitors.
- 15 We do not find these arguments persuasive. Minimal or reduced regulation does not mean no regulation. All of the Commission's rules governing telecommunications companies would be needlessly constraining if we accepted the commenters' position. We decline to do so. The Commission has a statutory obligation to ensure that landline telephone companies provide fair, just, and reasonable services to consumers in this state. The Commission's lack of jurisdiction to establish and enforce service quality standards for wireless and nomadic VoIP service providers does not absolve the Commission of that responsibility. We will not facilitate a race to the bottom of consumer protection.
- 16 More compelling is the information that CenturyLink, and to a lesser extent Frontier and WITA, provided in response to Staff's figures on the increased number of outage complaints since the Commission repealed WAC 480-120-440. Most, if not all, of those outages are attributable to adverse weather conditions and thus would have been excluded under that rule if it had still been in effect. All of the commenters, moreover, provided information demonstrating that they have not reduced staffing levels for technicians qualified to restore basic telephone service during that time. Staff also explained that it has relied on WAC 480-120-411 in the absence of WAC 480-120-440 to require that companies "promptly" restore service in the event of an outage. Based on the information before us, we do not believe that the record sufficiently warrants re adoption of the repealed rule, at least in that form.
- 17 We nevertheless find that Staff has raised concerns that merit further consideration. Fair, just, and reasonable telecommunications service includes an obligation to restore service following an outage as expeditiously as practicable. As Staff points out, other states have rules that reflect this principle.<sup>3</sup> The Commission continues to receive complaints from

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that this statement does not preclude the Commission from adopting proposed WAC 480-120-441 on other grounds. TR 16:21 – 17:6.

<sup>3</sup> See Appendix A, Staff Memo at 4 (describing the applicable rules in four other states).

customers that their service provider is not satisfying this requirement, and many of those consumers do not have a competitive alternative. While we are not prepared to readopt former WAC 480-120-440, we are not satisfied to rely solely on WAC 480-120-411 to address this issue. The existing rule's requirement that problems be remedied "promptly," for example, provides insufficient guidance to both companies and consumers on what constitutes a reasonable time in which providers must restore service.

18 Accordingly, we will open another rulemaking to consider the appropriate standard for restoring regulated telecommunications service following an outage. Pending the conclusion of that rulemaking, we find that, in the absence of extenuating circumstances, 48 hours is an appropriate benchmark for determining whether a company has "promptly" repaired or restored service problems in compliance with WAC 480-120-411. Extenuating circumstances include, but are not necessarily limited to, severe weather, natural disasters, or other causes beyond the company's control for as long as those conditions persist.

19 **COMMISSION ACTION:** After considering all of the information regarding this proposal, the Commission finds and concludes that it should amend and repeal the rules as proposed in the CR-102 at WSR # 16-11-096 with the changes described below.

20 **CHANGES FROM PROPOSAL:** The Commission adopts the proposal with the following changes from the text noticed at WSR #16-11-096:

WAC 480-120-021                      Definition of "**Order date**," second sentence, strike "the actions are completed by the applicant if" and substitute "those actions have been completed and the applicant notifies the company of that completion unless" and strike the following "not".

WAC 480-120-174                      Subsection (2), strike all references to the Washington telephone assistance program or WTAP.

WAC 480-120-441                      Not adopted.

21 **STATEMENT OF ACTION; STATEMENT OF EFFECTIVE DATE:** After reviewing the entire record, the Commission determines that the WAC sections listed in paragraph 6 above should be amended or repealed to read as set forth in Appendix B, as rules of the Washington Utilities and Transportation Commission, to take effect pursuant to RCW 34.05.380(2) on the thirty-first day after filing with the Code Reviser.

**ORDER**

22 **THE COMMISSION ORDERS:**

23 The Commission amends and repeals the sections in WAC Chapter 480-120 to read as set forth in Appendix B, as rules of the Washington Utilities and Transportation Commission, to take effect on the thirty-first day after the date of filing with the Code Reviser pursuant to RCW 34.05.380(2).

24 This Order and the rule set out below, after being recorded in the order register of the Washington Utilities and Transportation Commission, shall be forwarded to the Code Reviser for filing pursuant to RCW 80.01 and RCW 34.05 and WAC 1-21.

DATED at Olympia, Washington, September 22, 2016.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION



DAVID W. DANNER, Chairman



PHILIP B. JONES, Commissioner



ANN E. RENDAHL, Commissioner

*Note: The following is added at Code Reviser request for statistical purposes:*

Number of Sections Adopted in Order to Comply with Federal Statute: New 0, amended 0, repealed 0; Federal Rules or Standards: New 0, amended 0, repealed 0; or Recently Enacted State Statutes: New 0, amended 0, repealed 0.

Number of Sections Adopted at Request of a Nongovernmental Entity: New 0, amended 0, repealed 0.

Number of Sections Adopted on the Agency's own Initiative: New 0, amended 4, repealed 2.

Number of Sections Adopted in Order to Clarify, Streamline, or Reform Agency Procedures: New 0, amended 0, repealed 0.

Number of Sections Adopted using Negotiated Rule Making: New 0, amended 0, repealed 0; Pilot Rule Making: New 0, amended 0, repealed 0; or Other Alternative Rule Making: New 0, amended 0, repealed 0.

**Appendix A**  
**(Commission Staff Memorandum)**

**Appendix B**  
**[WAC 480-XX - RULES]**



**Washington State Complaint: CAS-44715-F8R6P4**

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**Company: CenturyLink Communications LLC**

**Industry: Telecommunications**

**Customer:** [REDACTED]

**Alt Contact:**

**Account Number:** [REDACTED]

**Service Phone:** [REDACTED]

**E-mail Address:** [REDACTED]

**Service Address:** [REDACTED]

**Complaint: CAS-44715-F8R6P4**

**Type: Complaint**

**Serviced By: Liz Dijos**

**Grouped By: Quality Of Service**

**Opened On: 10/26/2023, 9:37:13 AM**

**Closed On:**

**Disposition: In Progress**

**Violations Total: In Progress**

**TA Total: 0**

**Amount Customer Saved: \$183.00**

**Description:**

Around August 2023, the customer informed CenturyLink that there was heavy static on their landline. Weeks later a CenturyLink technician was dispatched and did not make any repairs. The issue worsened and the customer contacted CenturyLink again. Weeks later, CenturyLink dispatched a second technician that told the customer the problem was at the main office board, and it would be resolved. The static worsened again. Around the end of September 2023, the customer lost service completely. CenturyLink dispatched a technician that determined that the phone line was disconnected between the street and

the box outside of the customer's home. The technician was not able to reconnect the line because the work needed to be completed underground. The customer asserts that CenturyLink stated it would waive three months of billing after it completes the repair. Due to medical needs, the customer requires that they have their service to their landline phone restored immediately. The customer has given their permission to CenturyLink to contact them directly during the complaint investigation. [REDACTED]

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----- Original Message -----

**From:** Customer Advocacy (PUC) [uswpuc@centurylink.com]

**Sent:** 12/15/2023, 1:51 PM

**To:** liz.dijos@utc.wa.gov

**Subject:** RE: WA URGENT UTC Complaint CAS-44715-F8R6P4? for [REDACTED]  
CRM:0230790 [ ref:!00D4102HUz0.!5004N01SSVaD:ref ]

Hi Liz,

Here is the update I received from our repair escalation agent assigned to this customer regarding the delayed resolution.

I've been keeping an eye on it since you originally sent it in. Cable tickets in WA aren't getting worked quickly. I was told all the techs there have too much work to handle. This one was missed yesterday due to overtime exhaust. I'll fill out the escalation form to get it assigned, but I don't have high hopes to get this done right away.

Thanks,

Rene Williams

He/Him/His

Escalations Team Management

CO&S Customer Order Resolution

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**Activity Type: Email**

**Activity Date: 12/19/2023, 3:32:22 PM**

**To:** liz.dijos@utc.wa.gov;

**From:** uswpuc@centurylink.com

**Subject: RE: WA URGENT UTC Complaint CAS-44715-F8R6P4? for [REDACTED]  
CRM:0230790 [ ref:!00D4102HUz0.!5004N01SSVaD:ref ]**

**Attachments: 0**

**Body:**

External Email

Hi Liz,

The ticket is now due dated 12/22/2023 but not assigned to a technician yet.

Ticket ID#: **0424866**Status: **Unscheduled**

---

**Activity Type: Email**

**Activity Date: 1/11/2024, 8:40:13 AM**

**To: liz.dijos@utc.wa.gov;**

**From: uswpuc@centurylink.com**

**Subject: RE: Automatic reply: WA URGENT UTC Complaint CAS-44715-F8R6P4? for  
[REDACTED] CRM:0230790 [ ref:!00D4102HUz0.!5004N01SSVaD:ref ]**

**Attachments: 0**

**Body:**

External Email

Hi Liz,

The repair ticket is still showing a due date of 01/18/2024, it shows unscheduled which tells me our dispatch escalation team hasn't worked the expedited request.

---

**Activity Type: Email**

**Activity Date: 1/30/2024, 12:25:18 PM**

**To: liz.dijos@utc.wa.gov;**

**From: uswpuc@centurylink.com**

**Subject: RE: WA URGENT UTC Complaint CAS-44715-F8R6P4? for [REDACTED]  
CRM:0230790 [ ref:!00D4102HUz0.!5004N01SSVaD:ref ]**

**Attachments: 0**

**Body:**

External Email

Hi Liz,

The repair ticket has a past due date of 01/29/2024, and shows unscheduled.

---

**Activity Type: Email**

**Activity Date: 2/2/2024, 12:16:16 PM**

**To: liz.dijos@utc.wa.gov;**

**From: uswpuc@centurylink.com**

**Subject: RE: WA URGENT UTC Complaint CAS-44715-F8R6P4? for [REDACTED]  
CRM:0230790 [ ref:!00D4102HUz0.!5004N01SSVaD:ref ]**

**Attachments: 0**

**Body:**

External Email

Hi Liz,

The specific cause of the service issue was a disconnected phone line from the house to the terminal requiring a buried service wire contractor to replace/ repair.

Our contractor dug up and replaced the broken line, our technician determined the line was good on our side. The current problem is inside wiring needed repaired or jack replaced.

The unscheduled opened ticket keeps getting pushed out due to our cable technicians availability in the state.

From our regional supervisor:

This is now with our cable teams that will address this based on the priority of the service that is out.

They handle all levels of outages from cable damage, fiber cuts, design repairs, etc.

A single case of trouble on a copper line for residential is currently the lowest on that priority list. It will be handled once higher priority work has been complete.

The current due date is showing 02/15/2024, hopefully our dispatch center will be able to get this done sooner.

I will keep checking the ticket and keep you updated.

Extension request 02/08/2024

Regards,

Corey Tidwell  
Case Manager  
Customer Advocacy Group  
Office : 208-207-2236  
Corey.Tidwell@Lumen.com

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**Activity Type: Email**

**Activity Date: 7/5/2024, 11:48:41 AM**

**To: liz.dijos@utc.wa.gov;**

**From: uswpuc@centurylink.com**

**Subject: RE: WA URGENT UTC Complaint CAS-44715-F8R6P4? for [REDACTED]  
CRM:0230790 [ ref:!00D4102HUz0.!5004N01SSVaD:ref ]**

**Attachments: 0**

**Body:**

External Email

Hi Liz,

The repair ticket is still open waiting to be scheduled to a cable tech by our dispatch escalation team.

Ticket ID#: **0424866**Status: **Unscheduled**

---

**Activity Type: Email**

**Activity Date: 8/16/2024, 10:46:00 AM**

**To: liz.dijos@utc.wa.gov;**

**From: uswpuc@centurylink.com**

**Subject: RE: WA URGENT UTC Complaint CAS-44715-F8R6P4? for [REDACTED]  
CRM:0230790 [ ref:!00D4102HUz0.!5004N01SSVaD:ref ]**

**Attachments: 0**

**Body:**

External Email

Hi Liz,

The repair ticket currently has a due date of 08/27/2024.

Ticket ID#: **0424866**Status: **Unscheduled**

---

**Activity Type: Email**

**Activity Date: 9/4/2024, 2:28:59 PM**

**To: liz.dijos@utc.wa.gov;**

**From: uswpuc@centurylink.com**

**Subject: RE: WA URGENT UTC Complaint CAS-44715-F8R6P4? for [REDACTED]  
CRM:0230790 [ ref:!00D4102HUz0.!5004N01SSVaD:ref ]**

**Attachments: 0**

**Body:**

External Email

Hi Liz,

The repair ticket has been updated with due date of 09/16/2024.

Ticket ID#: **0424866**Status: **Unscheduled**

---

**Activity Type: Email**

**Activity Date: 11/22/2024, 11:43:39 AM**

**To: liz.dijos@utc.wa.gov;**

**From: uswpuc@centurylink.com**

**Subject: RE: WA URGENT UTC Complaint CAS-44715-F8R6P4? for [REDACTED]  
CRM:0230790 [ ref:!00D4102HUz0.!5004N01SSVaD:ref ]**

**Attachments: 0**

**Body:**

External Email

Hi Liz,

The open ticket for this customer now has a due date of 11/25/2024

Ticket ID#: **0424866**Status: **Unscheduled**

---

**Activity Type: Email**

**Activity Date: 1/28/2025, 11:05:43 AM**

**To: liz.dijos@utc.wa.gov;**

**From: uswpuc@centurylink.com**

**Subject: RE: WA URGENT UTC Complaint CAS-44715-F8R6P4? for [REDACTED]  
CRM:0230790 [ ref:!00D4102HUz0.!5004N01SSVaD:ref ]**

**Attachments: 0**

**Body:**

External Email

Hi Liz,

This customer is impacted by a cable outage. Their individual repair ticket was put in unscheduled status and added to the outage.

Ticket ID#: **0424866**Status: **Unscheduled**Outage ID: **WVF814**



# Attachment D

**Washington State Complaint: CAS-47069-T3V1K0**

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**Company: CenturyLink Communications LLC**

**Industry: Telecommunications**

**Customer:** [REDACTED]

**Alt Contact:**

**Account Number:** [REDACTED]

**Service Phone:** [REDACTED]

**E-mail Address:** [REDACTED]

**Service Address:** [REDACTED]

**Complaint: CAS-47069-T3V1K0**

**Type: Complaint**

**Serviced By: Johnny Perry**

**Grouped By: Quality Of Service**

**Opened On: 9/23/2024, 2:13:00 PM**

**Closed On:**

**Disposition: In Progress**

**Violations Total: 0**

**TA Total: 0**

**Amount Customer Saved:**

**Description:**

The customer contacted CenturyLink on Jan. 26, 2024, to report they had no dial-tone. CenturyLink gave the customer multiple repair commitment dates Feb. 7, 8, 12, 13, 19 and Feb. 27, 2024, which were missed. The customer estimates they contacted CenturyLink approximately five times each month to report they had no dial-tone. CenturyLink did not reschedule the repair commitment dates even though they remained without dial-tone service. The customer asserted that CenturyLink should dispatch a crew or technician to complete the necessary repairs to restore their dial-tone, immediately. The customer

requested a credit for the months of service they were billed for, but did not have service.

Please provide a narrative response to all allegations stated in the complaint Description. Responses should include actions the company took to address each of the stated allegations, or why action was not taken, and other information such as account or billing history, bill copies, repair request records, etc.

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**Activity Type: Phone Call**

**Activity Date: 11/25/2024, 12:40:00 PM**

**Direction: Incoming**

**Customer:** [REDACTED]

**UTC POC: Johnny Perry**

**Subject: [Customer Called](#)**

**Description:**

The customer called identifying themselves and the purpose of their call. They have spoken to CenturyLink asking for account details both from CenturyLink customer service and field technicians. The customer stated her first repair ticket generated Jan 26, 2024 (0235357) was closed on Aug. 21 2024 by CenturyLink with a notice to the customer their landline had been restored. They contacted CenturyLink that day to report their landline had not been restored. CenturyLink then opened a new ticket (0264311), however the customer's landline continues to be out of service. The customer called to request that staff contact CenturyLink and request complete account details and notes from CenturyLink records from field technicians and customer service team notes from their account. They thanked me for my time and we ended the call.

# Attachment E

## Consumer Complaints Days Beyond Response Time Requirement March 13, 2023, through January 31, 2025

	(Do Not Modify) Modified On	Case Number (Case) (Case)	Case Type (Case) (Case)	Complaint Group (Case) (Case)	Violation (WAC or RCW)	Count
1	7/17/2024 20:52	CAS-46357-Y5M1Z2	Complaint	Quality Of Service	480-120-166(4)(b)	1
2	4/25/2024 16:15	CAS-45988-G6V1C3	Complaint	Quality Of Service	480-120-166(4)(b)	1
3	6/12/2024 18:03	CAS-46157-F2Q9V1	Complaint	Quality Of Service	480-120-166(6)	1
4	4/25/2024 22:50	CAS-46046-K7S4J1	Complaint	Quality Of Service	480-120-166(4)(b)	1
5	6/18/2024 15:40	CAS-45908-D0B5N0	Complaint	Quality Of Service	480-120-166(8)	1
6	8/8/2024 19:05	CAS-45908-D0B5N0	Complaint	Quality Of Service	480-120-166(4)(b)	1
7	11/8/2024 0:39	CAS-46077-J2K7W6	Complaint	Quality Of Service	480-120-166(9)	1
8	11/12/2024 22:03	CAS-46077-J2K7W6	Complaint	Quality Of Service	480-120-166(9)	1
9	1/27/2025 17:39	CAS-47656-S9V9M2	Complaint	Quality Of Service	480-120-166(8)	1
10	9/30/2024 21:17	CAS-46677-P2M1N2	Complaint	Quality Of Service	480-120-166(1)	1
11	9/30/2024 21:30	CAS-46677-P2M1N2	Complaint	Quality Of Service	480-120-166(8)	1
12	12/18/2024 16:21	CAS-46501-J3S6V1	Complaint	Quality Of Service	480-120-166(4)(b)	1
13	8/7/2024 20:46	CAS-45332- W1N5Q4	Complaint	Quality Of Service	480-120-166(8)	1
14	6/28/2024 16:52	CAS-45332- W1N5Q4	Complaint	Quality Of Service	480-120-166(9)	1
15	7/1/2024 17:34	CAS-45761-C2S1F1	Complaint	Quality Of Service	480-120-166(4)(b)	1
16	7/2/2024 1:19	CAS-44088-W6Z8Z9	Complaint	Quality Of Service	480-120-166(9)	1
17	7/3/2024 0:53	CAS-44896-Z9B7L8	Complaint	Quality Of Service	480-120-166(8)	1
18	7/10/2024 20:59	CAS-45846-X0Y4B9	Complaint	Quality Of Service	480-120-166(9)	1
19	6/21/2024 17:07	CAS-45955-V4M3V1	Complaint	Quality Of Service	480-120-166(4)(b)	1
20	4/12/2024 17:15	CAS-43013-G0V5K8	Complaint	Quality Of Service	480-120-166(4)(b)	1
21	4/29/2024 20:36	CAS-45904-K0B1W4	Complaint	Quality Of Service	480-120-166(8)	1
22	4/29/2024 23:05	CAS-45369-R8M9D5	Complaint	Quality Of Service	480-120-166(4)(b)	1
23	4/29/2024 23:58	CAS-45965-J4H5F2	Complaint	Quality Of Service	480-120-166(4)(b)	1
24	5/6/2024 22:09	CAS-45221-B5W2H2	Complaint	Quality Of Service	480-120-166(8)	1
25	5/31/2024 17:25	CAS-45863-W1C6P4	Complaint	Quality Of Service	480-120-166(4)(b)	1
26	4/18/2024 17:01	CAS-45220-K4Q9J1	Complaint	Quality Of Service	480-120-166(9)	1
27	4/17/2024 21:23	CAS-46016-G2L7Y5	Complaint	Quality Of Service	480-120-166(8)	1
28	5/7/2024 22:20	CAS-45904-K0B1W4	Complaint	Quality Of Service	480-120-166(8)	1
29	5/2/2024 16:52	CAS-44468-J3N8D8	Complaint	Quality Of Service	480-120-166(4)(b)	1
30	6/7/2024 18:23	CAS-45587-P8Y2M3	Complaint	Quality Of Service	480-120-166(6)	1
31	5/30/2024 19:15	CAS-46198-G3V1T3	Complaint	Quality Of Service	480-120-166(6)	1
32	4/9/2024 18:07	CAS-46016-G2L7Y5	Complaint	Quality Of Service	480-120-166(6)	1
33	4/10/2024 21:39	CAS-45429-M4F5H7	Complaint	Quality Of Service	480-120-166(8)	1
34	4/11/2024 18:04	CAS-45344-R9X5T4	Complaint	Quality Of Service	480-120-166(4)(b)	1
35	5/3/2024 23:42	CAS-45778-C8R3Z1	Complaint	Quality Of Service	480-120-166(6)	1
36	4/4/2024 19:19	CAS-45515-T8Q3X8	Complaint	Quality Of Service	480-120-166(8)	1
37	4/4/2024 20:55	CAS-45932-W4T9G4	Complaint	Quality Of Service	480-120-166(8)	1
38	3/14/2024 19:28	CAS-45814-P5J3R9	Complaint	Quality Of Service	480-120-166(4)(b)	1
39	3/16/2024 0:02	CAS-45857-Y9T5B1	Complaint	Quality Of Service	480-120-166(6).	1
40	3/18/2024 16:32	CAS-45605-G4W9D2	Complaint	Quality Of Service	480-120-166(4)(b)	1
41	3/22/2024 17:36	CAS-45344-R9X5T4	Complaint	Quality Of Service	480-120-166(8)	1

# Attachment E

## Consumer Complaints

### Days Beyond Response Time Requirement

March 13, 2023, through January 31, 2025

42	3/14/2024 21:31	CAS-45814-P5J3R9	Complaint	Quality Of Service	480-120-166(8)	1
43	3/19/2024 17:40	CAS-45393-F8P7S3	Complaint	Quality Of Service	480-120-166(9)	1
44	3/27/2024 21:21	CAS-45429-M4F5H7	Complaint	Quality Of Service	480-120-166(8)	1
45	4/2/2024 22:05	CAS-45021-Y3W4P7	Complaint	Quality Of Service	480-120-166(9)	1
46	3/29/2024 15:31	CAS-45885-L9L2B1	Complaint	Quality Of Service	480-120-166(8)	1
47	3/27/2024 15:50	CAS-45208-T7J8B4	Complaint	Quality Of Service	480-120-166(9)	1
48	8/6/2024 19:30	CAS-44896-Z9B7L8	Complaint	Quality Of Service	480-120-166(8)	1
49	8/14/2024 0:12	CAS-45047-Z6Q7T6	Complaint	Quality Of Service	480-120-166(8)	1
50	7/18/2024 19:30	CAS-45631-F0Q5C6	Complaint	Quality Of Service	480-120-166(9)	1
51	11/14/2024 18:25	CAS-44919-D8K3Y9	Complaint	Quality Of Service	480-120-166(9)	1
52	7/25/2024 19:02	CAS-45287-D2V1F3	Complaint	Quality Of Service	480-120-166(9)	1
53	7/25/2024 22:53	CAS-46285-M4F6W8	Complaint	Quality Of Service	480-120-166(4)(b)	1
54	9/28/2024 0:02	CAS-46431-F5T3Q4	Complaint	Quality Of Service	480-120-166(8)	1
55	12/30/2024 18:31	CAS-47527-D6H4K0	Complaint	Quality Of Service	480-120-166(8)	1
56	1/7/2025 19:16	CAS-47053-S4F6R2	Complaint	Quality Of Service	480-120-166(6)	1
57	8/16/2024 21:55	CAS-44896-Z9B7L8	Complaint	Quality Of Service	480-120-166(9)	1
58	6/28/2024 16:16	CAS-45772-R9G3G4	Complaint	Quality Of Service	480-120-166(8)	1
59	6/28/2024 18:00	CAS-46244-G2F6M9	Complaint	Quality Of Service	480-120-166(4)(b)	1
60	9/9/2024 20:17	CAS-46608-H4S3B9	Complaint	Quality Of Service	480-120-166(8)	1
61	9/16/2024 20:49	CAS-46232-Q7P4K1	Complaint	Quality Of Service	480-120-166(6)	1
62	10/18/2024 16:01	CAS-47224-V5C1P4	Complaint	Quality Of Service	480-120-166(7)	1
63	10/18/2024 16:09	CAS-47259-T8V4F4	Complaint	Quality Of Service	480-120-166(6)	1
64	7/3/2024 19:22	CAS-45092-D7B9Z7	Complaint	Quality Of Service	480-120-166(4)(b)	1
65	5/23/2024 17:21	CAS-46203-H0Y4C1	Complaint	Quality Of Service	480-120-166(6)	1
66	6/11/2024 21:21	CAS-46244-G2F6M9	Complaint	Quality Of Service	480-120-166(8)	1
67	6/13/2024 22:44	CAS-45171-F3Y5H9	Complaint	Quality Of Service	480-120-166(8)	1
68	8/26/2024 21:44	CAS-46426-R9M7S3	Complaint	Quality Of Service	480-120-166(8)	1
69	8/29/2024 21:57	CAS-46844-X1L3J8	Complaint	Quality Of Service	480-120-166(4)(b)	1
70	3/13/2024 15:56	CAS-45168-F1B8W7	Complaint	Quality Of Service	480-120-166(9)	1
71	11/21/2024 1:27	CAS-45969-M6C7R1	Complaint	Quality Of Service	480-120-166(4)(b)	1
72	3/16/2024 16:14	CAS-45244-Z6N2F2	Complaint	Quality Of Service	480-120-166(9)	1
73	1/29/2025 17:33	CAS-47228-D0C1S1	Complaint	Quality Of Service	480-120-166(8)	1
74	1/14/2025 16:30	CAS-47959-F1Z9B0	Complaint	Quality Of Service	480-120-166(4)(b)	2
75	12/12/2024 20:37	CAS-47344-H2C8Q5	Complaint	Quality Of Service	480-120-166(8)	2
76	7/26/2024 22:18	CAS-45532-V5J5S1	Complaint	Quality Of Service	480-120-166(8)	2
77	6/28/2024 16:41	CAS-45332- W1N5Q4	Complaint	Quality Of Service	480-120-166(8)	2
78	7/2/2024 1:38	CAS-44088-W6Z8Z9	Complaint	Quality Of Service	480-120-166(8)	2
79	7/2/2024 1:28	CAS-44088-W6Z8Z9 CAS-46112-	Complaint	Quality Of Service	480-120-166(8)	2
80	5/31/2024 21:04	B2W3W8	Complaint	Quality Of Service	480-120-166(8)	2
81	4/22/2024 23:15	CAS-45677-R6D4T5	Complaint	Quality Of Service	480-120-166(8)	2
82	4/25/2024 19:07	CAS-43013-G0V5K8	Complaint	Quality Of Service	480-120-166(8)	2
83	4/17/2024 16:59	CAS-45904-K0B1W4	Complaint	Quality Of Service	480-120-166(8)	2
84	4/2/2024 17:11	CAS-45968-G3R9S4	Complaint	Quality Of Service	480-120-166(6)	2
85	5/2/2024 21:34	CAS-45767-K8S7N3	Complaint	Quality Of Service	480-120-166(6)	2

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86	4/8/2024 17:32	CAS-45429-M4F5H7	Complaint	Quality Of Service	480-120-166(8)	2
87	3/21/2024 19:25	CAS-45217-R3D6D7	Complaint	Quality Of Service	480-120-166(8)	2
88	3/29/2024 20:50	CAS-45171-F3Y5H9	Complaint	Quality Of Service	480-120-166(8)	2
89	4/16/2024 23:58	CAS-45216-P2X7F2	Complaint	Quality Of Service	480-120-166(8)	2
90	8/13/2024 22:17	CAS-46249-V6M6X7	Complaint	Quality Of Service	480-120-166(8)	2
91	9/24/2024 17:54	CAS-46278-B9V5Y0	Complaint	Quality Of Service	480-120-166(8)	2
92	12/5/2024 16:47	CAS-45332-W1N5Q4	Complaint	Quality Of Service	480-120-166(8)	2
93	7/2/2024 21:28	CAS-45968-G3R9S4	Complaint	Quality Of Service	480-120-166(8)	2
94	10/16/2024 15:46	CAS-46981-S0Q7G7	Complaint	Quality Of Service	480-120-166(4)(b)	2
95	7/12/2024 22:42	CAS-46220-C0W4T0	Complaint	Quality Of Service	480-120-166(8)	2
96	6/20/2024 18:13	CAS-44889-D3P8L2	Complaint	Quality Of Service	480-120-166(8)	2
97	11/27/2024 21:24	CAS-47267-N6S4G8	Complaint	Quality Of Service	480-120-166(8)	2
98	8/13/2024 15:20	CAS-46705-S2H9J1	Complaint	Quality Of Service	480-120-166(8)	2
99	7/17/2024 17:55	CAS-46482-P7Z8K3	Complaint	Quality Of Service	480-120-166(8)	2
100	4/3/2024 21:26	CAS-45681-M1V4P2	Complaint	Quality Of Service	480-120-166(4)(b)	2
101	3/16/2024 15:14	CAS-45088-J0K2L1	Complaint	Quality Of Service	480-120-166(4)(b)	2
102	3/29/2024 18:05	CAS-45626-Q7F8V6	Complaint	Quality Of Service	480-120-166(4)(b)	2
103	5/30/2024 18:05	CAS-45498-T0G3L2	Complaint	Quality Of Service	480-120-166(6)	3
104	1/22/2025 17:16	CAS-45772-R9G3G4	Complaint	Quality Of Service	480-120-166(8)	3
105	1/10/2025 17:48	CAS-45772-R9G3G4	Complaint	Quality Of Service	480-120-166(8)	3
106	12/23/2024 20:09	CAS-47537-B9Z5T7	Complaint	Quality Of Service	480-120-166(4)(b)	3
107	9/30/2024 21:29	CAS-46677-P2M1N2	Complaint	Quality Of Service	480-120-166(6)	3
108	4/12/2024 18:10	CAS-45904-K0B1W4	Complaint	Quality Of Service	480-120-166(8)	3
109	5/10/2024 20:36	CAS-44571-X4L5P9	Complaint	Quality Of Service	480-120-166(8)	3
110	3/21/2024 23:03	CAS-45677-R6D4T5	Complaint	Quality Of Service	480-120-166(6)	3
111	3/22/2024 15:33	CAS-45857-Y9T5B1	Complaint	Quality Of Service	480-120-166(6)	3
112	3/23/2024 0:02	CAS-45856-G0L7M4	Complaint	Quality Of Service	480-120-166(6)	3
113	7/22/2024 16:58	CAS-44927-Y3W3M0	Complaint	Quality Of Service	480-120-166(8)	3
114	10/30/2024 17:43	CAS-45517-X4Z9G8	Complaint	Quality Of Service	480-120-166(8)	3
115	8/27/2024 14:58	CAS-45409-T3H2S5	Complaint	Quality Of Service	480-120-166(8)	3
116	11/12/2024 20:14	CAS-46965-G4F8R4	Complaint	Quality Of Service	480-120-166(8)	3
117	6/10/2024 18:08	CAS-46298-V2V1C0	Complaint	Quality Of Service	480-120-166(8)	3
118	5/28/2024 23:23	CAS-46298-V2V1C0	Complaint	Quality Of Service	480-120-166(6)	3
119	10/11/2024 19:06	CAS-46986-G4J9P0	Complaint	Quality Of Service	480-120-166(4)(b)	3
120	10/2/2024 15:51	CAS-46181-Y8B1Y9	Complaint	Quality Of Service	480-120-166(6)	4
121	10/21/2024 18:12	CAS-47099-K4J3L0	Complaint	Quality Of Service	480-120-166(6)	4
122	10/21/2024 19:04	CAS-47031-P9Y7C7	Complaint	Quality Of Service	480-120-166(6)	4
123	4/11/2024 15:24	CAS-44723-L6D8S2	Complaint	Quality Of Service	480-120-166(8)	4
124	5/6/2024 22:05	CAS-45221-B5W2H2	Complaint	Quality Of Service	480-120-166(8)	4
125	4/17/2024 18:35	CAS-44994-V5N8Y0	Complaint	Quality Of Service	480-120-166(8)	4
126	4/9/2024 17:36	CAS-45216-P2X7F2	Complaint	Quality Of Service	480-120-166(8)	4
127	4/8/2024 17:09	CAS-45171-F3Y5H9	Complaint	Quality Of Service	480-120-166(8)	4
128	5/3/2024 23:41	CAS-45778-C8R3Z1	Complaint	Quality Of Service	480-120-166(6)	4
129	3/22/2024 22:39	CAS-45885-L9L2B1	Complaint	Quality Of Service	480-120-166(6)	4
130	5/30/2024 23:41	CAS-46206-V9G4Y2	Complaint	Quality Of Service	480-120-166(6)	4

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131	4/18/2024 22:36	CAS-46041-T3J1Y5	Complaint	Quality Of Service	480-120-166(6)	4
132	3/27/2024 16:00	CAS-45904-K0B1W4	Complaint	Quality Of Service	480-120-166(6)	4
133	8/13/2024 22:18	CAS-46249-V6M6X7	Complaint	Quality Of Service	480-120-166(6)	4
134	8/16/2024 21:46	CAS-44896-Z9B7L8	Complaint	Quality Of Service	480-120-166(8)	4
135	9/3/2024 17:48	CAS-46608-H4S3B9	Complaint	Quality Of Service	480-120-166(7)	4
136	7/9/2024 23:10	CAS-46513-S1W3G2	Complaint	Quality Of Service	480-120-166(6)	4
137	8/21/2024 20:48	CAS-46417-B6P6P1	Complaint	Quality Of Service	480-120-166(8)	4
138	8/16/2024 21:14	CAS-45873-R6W2J4	Complaint	Quality Of Service	480-120-166(4)(b)	4
139	12/12/2024 23:48	CAS-47605-R1Z7Y3	Complaint	Quality Of Service	480-120-166(4)(b)	4
140	3/29/2024 21:21	CAS-45811-X0V5J3	Complaint	Quality Of Service	480-120-166(4)(b) 480-120-	4
141	7/12/2024 17:50	CAS-46275-S2J6F0	Complaint	Quality Of Service	166(4)b(b)	5
142	1/27/2025 19:04	CAS-47577-F8V9P8	Complaint	Quality Of Service	480-120-166(8)	5
143	7/26/2024 22:37	CAS-45532-V5J5S1	Complaint	Quality Of Service	480-120-166(8)	5
144	5/17/2024 18:06	CAS-45380-B0P1C5	Complaint	Quality Of Service	480-120-166(8)	5
145	3/21/2024 23:24	CAS-45686-S2T0P0	Complaint	Quality Of Service	480-120-166(6)	5
146	8/26/2024 17:19	CAS-45916-L1Z1V2	Complaint	Quality Of Service	480-120-166(4)(b)	5
147	10/4/2024 23:00	CAS-46746-J0C1Y8	Complaint	Quality Of Service	480-120-166(6)	5
148	6/21/2024 22:12	CAS-46417-B6P6P1	Complaint	Quality Of Service	480-120-166(6)	5
149	9/18/2024 19:46	CAS-46941-L6F6F9	Complaint	Quality Of Service	480-120-166(4)(b)	5
150	7/22/2024 19:13	CAS-45729-J8S0F0	Complaint	Quality Of Service	480-120-166(4)(b)	6
151	10/7/2024 18:10	CAS-46600-Y4P1N2	Complaint	Quality Of Service	480-120-166(6)	6
152	5/6/2024 16:42	CAS-46127-C3Z3L8	Complaint	Quality Of Service	480-120-166(6)	6
153	3/13/2024 16:37	CAS-45683-C4D4G8	Complaint	Quality Of Service	480-120-166(6)	6
154	5/2/2024 21:30	CAS-45767-K8S7N3	Complaint	Quality Of Service	480-120-166(6)	6
155	3/25/2024 18:49	CAS-45459-Q7V9V8	Complaint	Quality Of Service	480-120-166(6)	6
156	8/14/2024 14:58	CAS-44571-X4L5P9	Complaint	Quality Of Service	480-120-166(8)	6
157	8/27/2024 23:35	CAS-46414-M2W3F2	Complaint	Quality Of Service	480-120-166(6)	6
158	8/14/2024 18:50	CAS-46466-W5V1G1	Complaint	Quality Of Service	480-120-166(6)	6
159	8/26/2024 21:25	CAS-46407-G9L8L3	Complaint	Quality Of Service	480-120-166(6)	6
160	10/15/2024 18:26	CAS-46584-Q9X5Z0	Complaint	Quality Of Service	480-120-166(6)	6
161	9/26/2024 17:23	CAS-45899-D1L4X3	Complaint	Quality Of Service	480-120-166(8)	6
162	4/25/2024 20:48	CAS-45377-M2V3X4	Complaint	Quality Of Service	480-120-166(8)	7
163	8/28/2024 18:52	CAS-46421-Q0J9T8	Complaint	Quality Of Service	480-120-166(6)	7
164	7/12/2024 20:42	CAS-46131-N3M5W1	Complaint	Quality Of Service	480-120-166(8)	7
165	11/14/2024 0:07	CAS-47191-H6S5Y3	Complaint	Quality Of Service	480-120-166(4)(b) CAS-45718-	7
166	6/12/2024 16:00	W1N9Q9	Complaint	Quality Of Service	480-120-166(6)	8
167	4/12/2024 18:33	CAS-45501-C4V4R3	Complaint	Quality Of Service	480-120-166(8)	8
168	4/22/2024 22:29	CAS-45836-T6J4Y5	Complaint	Quality Of Service	480-120-166(6)	8
169	1/23/2025 22:23	CAS-45969-M6C7R1	Complaint	Quality Of Service	480-120-166(8)	8
170	10/2/2024 22:41	CAS-46437-W0C3X5	Complaint	Quality Of Service	480-120-166(6) CAS-45332-	8
171	6/28/2024 16:20	W1N5Q4	Complaint	Quality Of Service	480-120-166(8)	8
172	4/3/2024 17:25	CAS-45808-C0L4N9	Complaint	Quality Of Service	480-120-166(8)	8
173	8/29/2024 1:36	CAS-45671-T3D5D9	Complaint	Quality Of Service	480-120-166(8)	8

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174	8/23/2024 16:31	CAS-46312-B2H8S0	Complaint	Quality Of Service	480-120-166(6)	8
175	7/17/2024 22:48	CAS-46298-V2V1C0	Complaint	Quality Of Service	480-120-166(8)	8
176	10/14/2024 22:51	CAS-46924-X8L1C2	Complaint	Quality Of Service	480-120-166(4)(b)	8
177	6/12/2024 16:44	CAS-45772-R9G3G4	Complaint	Quality Of Service	480-120-166(8)	8
178	6/20/2024 18:49	CAS-46388-L5Q6V0	Complaint	Quality Of Service	480-120-166(6)	8
179	11/12/2024 22:50	CAS-46497-R5M5G5	Complaint	Quality Of Service	480-120-166(8)	9
180	9/18/2024 19:44	CAS-46799-N9L4V3	Complaint	Quality Of Service	480-120-166(6)	9
181	12/12/2024 22:16	CAS-46464-F5L7Z6	Complaint	Quality Of Service	480-120-166(8)	9
182	7/25/2024 18:34	CAS-46342-Y8S6F9	Complaint	Quality Of Service	480-120-166(6)	9
183	7/31/2024 19:19	CAS-44919-D8K3Y9	Complaint	Quality Of Service	480-120-166(8)	9
184	4/25/2024 21:21	CAS-45767-K8S7N3	Complaint	Quality Of Service	480-120-166(6)	9
185	4/2/2024 22:38	CAS-45899-D1L4X3	Complaint	Quality Of Service	480-120-166(6)	9
186	5/15/2024 21:10	CAS-46184-X2R8Z5	Complaint	Quality Of Service	480-120-166(6)	9
187	4/3/2024 15:56	CAS-45539-N7S1G7	Complaint	Quality Of Service	480-120-166(6)	9
188	7/25/2024 23:24	CAS-46285-M4F6W8	Complaint	Quality Of Service	480-120-166(6)	9
189	9/11/2024 23:34	CAS-46597-D0S4H5	Complaint	Quality Of Service	480-120-166(6)	10
190	10/2/2024 22:43	CAS-46437-W0C3X5	Complaint	Quality Of Service	480-120-166(8)	10
191	7/26/2024 22:25	CAS-45532-V5J5S1	Complaint	Quality Of Service	480-120-166(8)	10
192	6/11/2024 23:52	CAS-44872-Q1D7G0	Complaint	Quality Of Service	480-120-166(8)	10
193	4/17/2024 18:20	CAS-45614-R7V4G2	Complaint	Quality Of Service	480-120-166(6)	10
194	4/17/2024 21:02	CAS-45973-D4Z6N5	Complaint	Quality Of Service	480-120-166(4)(b)	10
195	3/26/2024 22:19	CAS-45799-L5C3W6	Complaint	Quality Of Service	480-120-166(8)	10
196	3/29/2024 20:32	CAS-45837-F9Z6X3	Complaint	Quality Of Service	480-120-166(6)	10
197	3/25/2024 18:52	CAS-45459-Q7V9V8	Complaint	Quality Of Service	480-120-166(8)	10
198	10/2/2024 19:17	CAS-47026-D8X0Y0	Complaint	Quality Of Service	480-120-166(6)	10
199	10/30/2024 19:19	CAS-46813-Y0B5N3	Complaint	Quality Of Service	480-120-166(6)	10
200	7/10/2024 16:39	CAS-45899-D1L4X3	Complaint	Quality Of Service	480-120-166(8)	10
201	11/20/2024 18:48	CAS-47204-T1H2M9	Complaint	Quality Of Service	480-120-166(4)(b)	10
202	10/7/2024 19:44	CAS-46996-R5R7R9	Complaint	Quality Of Service	480-120-166(4)(b)	10
203	8/14/2024 23:25	CAS-45899-D1L4X3	Complaint	Quality Of Service	480-120-166(8)	10
204	4/8/2024 22:12	CAS-45668-R9S8X8	Complaint	Quality Of Service	480-120-166(8)	10
205	4/17/2024 15:55	CAS-45654-K4M0T1	Complaint	Quality Of Service	480-120-166(6)	11
206	7/2/2024 21:54	CAS-45968-G3R9S4	Complaint	Quality Of Service	480-120-166(6)	11
207	3/13/2024 15:35	CAS-45652-B3Q4Z1	Complaint	Quality Of Service	480-120-166(6)	11
208	5/1/2024 22:49	CAS-45748-P7T5P5	Complaint	Quality Of Service	480-120-166(8)	11
209	3/27/2024 15:44	CAS-45208-T7J8B4	Complaint	Quality Of Service	480-120-166(6)	11
210	6/21/2024 20:13	CAS-46119-G0C3V4	Complaint	Quality Of Service	480-120-166(8)	11
211	5/28/2024 20:58	CAS-46241-L6J4F4	Complaint	Quality Of Service	480-120-166(6)	11
212	3/29/2024 15:46	CAS-45770-P3V5V2	Complaint	Quality Of Service	480-120-166(4)(b)	11
213	7/30/2024 23:32	CAS-45753-Y9L0F0	Complaint	Quality Of Service	480-120-166(6)	12
214	5/29/2024 18:01	CAS-45498-T0G3L2	Complaint	Quality Of Service	480-120-166(8)	12
215	9/23/2024 22:46	CAS-46667-P1R4T9	Complaint	Quality Of Service	480-120-166(6)	12
216	5/28/2024 22:30	CAS-45210-F9B4S5	Complaint	Quality Of Service	480-120-166(8)	12
217	3/20/2024 22:20	CAS-45200-S6H3H6	Complaint	Quality Of Service	480-120-166(6)	12
218	3/25/2024 21:10	CAS-45807-G7S4M0	Complaint	Quality Of Service	480-120-166(6)	12
219	10/24/2024 23:42	CAS-46744-W5Q3B6	Complaint	Quality Of Service	480-120-166(6)	12

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220	12/5/2024 1:18	CAS-45238-M2B2M1	Complaint	Quality Of Service	480-120-166(8)	12
221	7/11/2024 19:44	CAS-46322-G2M3D5	Complaint	Quality Of Service	480-120-166(6)	12
222	12/5/2024 17:53	CAS-47503-D2K3J9	Complaint	Quality Of Service	480-120-166(4)(b)	12
223	3/15/2024 21:24	CAS-45721-Z0H2T1	Complaint	Quality Of Service	480-120-166(4)(b)	12
224	1/29/2025 17:33	CAS-47228-D0C1S1	Complaint	Quality Of Service	480-120-411(1)(c)	12
225	1/9/2025 21:46	CAS-47297-G4F5S1	Complaint	Quality Of Service	480-120-166(8)	13
226	9/20/2024 17:11	CAS-45581-V9S1Q1	Complaint	Quality Of Service	480-120-166(8)	13
227	10/14/2024 16:06	CAS-46762-T1W2W6	Complaint	Quality Of Service	480-120-166(6)	13
228	3/23/2024 16:03	CAS-45709-D5M8Q1	Complaint	Quality Of Service	480-120-166(6)	13
229	3/14/2024 23:33	CAS-45691-C9R0C3	Complaint	Quality Of Service	480-120-166(6)	13
230	9/20/2024 23:00	CAS-46884-F1Y2S5	Complaint	Quality Of Service	480-120-166(6)	13
231	10/30/2024 17:42	CAS-45517-X4Z9G8	Complaint	Quality Of Service	480-120-166(6)	13
232	11/14/2024 23:36	CAS-47117-H6Z1T7	Complaint	Quality Of Service	480-120-166(4)(b)	13
233	10/9/2024 20:57	CAS-46901-H2S2X3 CAS-45332-	Complaint	Quality Of Service	480-120-166(4)(b)	13
234	6/28/2024 17:28	W1N5Q4	Complaint	Quality Of Service	480-120-166(8)	14
235	8/16/2024 22:12	CAS-44896-Z9B7L8	Complaint	Quality Of Service	480-120-166(8)	14
236	3/19/2024 21:09	CAS-45719-L7G4V6	Complaint	Quality Of Service	480-120-166(6)	14
237	12/24/2024 23:19	CAS-47543-B4W9Q6	Complaint	Quality Of Service	480-120-166(4)(b)	15
238	5/3/2024 23:47	CAS-45778-C8R3Z1	Complaint	Quality Of Service	480-120-166(6)	15
239	4/15/2024 17:50	CAS-45923-Z3P7S8	Complaint	Quality Of Service	480-120-166(6)	15
240	4/29/2024 17:27	CAS-45001-W0Q4C0	Complaint	Quality Of Service	480-120-166(6)	15
241	10/31/2024 19:55	CAS-46965-G4F8R4	Complaint	Quality Of Service	480-120-166(4)(b)	15
242	6/5/2024 22:30	CAS-46244-G2F6M9	Complaint	Quality Of Service	480-120-166(6)	15
243	10/10/2024 22:49	CAS-46900-N0Y3S6	Complaint	Quality Of Service	480-120-166(4)(b)	15
244	11/26/2024 21:41	CAS-47376-K6P3G1	Complaint	Quality Of Service	480-120-166(4)(b)	15
245	8/29/2024 23:37	CAS-45979-V6P7J6	Complaint	Quality Of Service	480-120-166(4)(b)	16
246	1/16/2025 23:43	CAS-47524-X6B9R7	Complaint	Quality Of Service	480-120-166(4)(b)	16
247	4/22/2024 21:56	CAS-45938-K5Q5F2	Complaint	Quality Of Service	480-120-166(6)	16
248	6/7/2024 18:26	CAS-45587-P8Y2M3	Complaint	Quality Of Service	480-120-166(8)	16
249	3/20/2024 16:42	CAS-44994-V5N8Y0	Complaint	Quality Of Service	480-120-166(6)	16
250	5/9/2024 23:13	CAS-45406-B7J3X2	Complaint	Quality Of Service	480-120-166(8)	16
251	5/29/2024 19:28	CAS-45598-Y6N9H3	Complaint	Quality Of Service	480-120-166(8)	17
252	7/11/2024 0:08	CAS-45846-X0Y4B9 CAS-45332-	Complaint	Quality Of Service	480-120-166(4)(b)	17
253	12/5/2024 16:36	W1N5Q4	Complaint	Quality Of Service	480-120-166(8)	17
254	11/27/2024 21:57	CAS-47162-K7W7F3	Complaint	Quality Of Service	480-120-166(4)(b)	17
255	12/19/2024 23:00	CAS-47283-S4D6G6	Complaint	Quality Of Service	480-120-166(4)(b)	17
256	6/4/2024 21:45	CAS-46220-C0W4T0	Complaint	Quality Of Service	480-120-166(6)	17
257	8/26/2024 22:33	CAS-46720-S5G5K0	Complaint	Quality Of Service	480-120-166(4)(b)	17
258	1/29/2025 19:50	CAS-47992-H4Z7R1	Complaint	Quality Of Service	480-120-411(1)(c)	17
259	1/3/2025 22:53	CAS-47458-R7B3Y9	Complaint	Quality Of Service	480-120-166(4)(b)	18
260	7/16/2024 18:26	CAS-46269-J8H8C9	Complaint	Quality Of Service	480-120-166(6)	18
261	5/24/2024 23:15	CAS-46083-C2Z1T0 CAS-45757-	Complaint	Quality Of Service	480-120-166(6)	18
262	4/12/2024 16:57	W7W2M1	Complaint	Quality Of Service	480-120-166(6)	18



# Attachment E

## Consumer Complaints

### Days Beyond Response Time Requirement

March 13, 2023, through January 31, 2025

263	4/8/2024 23:10	CAS-45202-F3S6C0	Complaint	Quality Of Service	480-120-166(8)	18
264	6/25/2024 18:28	CAS-46315-C1R8H2	Complaint	Quality Of Service	480-120-166(6)	18
265	4/3/2024 21:27	CAS-45681-M1V4P2	Complaint	Quality Of Service	480-120-166(9)	18
266	1/27/2025 19:46	CAS-47539-M2G9S8	Complaint	Quality Of Service	480-120-166(4)(b)	19
267	6/13/2024 22:40	CAS-45407-R9G3Z7	Complaint	Quality Of Service	480-120-166(8)	19
268	4/17/2024 15:32	CAS-45886-P3S2W5	Complaint	Quality Of Service	480-120-166(6)	20
269	10/24/2024 23:58	CAS-46254-L7K8M9	Complaint	Quality Of Service	480-120-166(6)	20
		CAS-46349-				
270	8/23/2024 22:28	Q6H9W5	Complaint	Quality Of Service	480-120-166(6)	20
271	10/11/2024 21:00	CAS-46936-T5V0L9	Complaint	Quality Of Service	480-120-166(4)(b)	20
272	4/4/2024 0:30	CAS-45059-S0B1W7	Complaint	Quality Of Service	480-120-166(9)	20
273	1/29/2025 18:31	CAS-47671-S1B1T4	Complaint	Quality Of Service	480-120-411(1)(c)	20
274	4/16/2024 21:15	CAS-45564-M7F6K6	Complaint	Quality Of Service	480-120-166(8)	21
275	4/17/2024 21:11	CAS-45756-Q5N1K3	Complaint	Quality Of Service	480-120-166(8)	21
276	6/4/2024 22:28	CAS-44881-K3X5L2	Complaint	Quality Of Service	480-120-166(8)	21
277	12/5/2024 22:21	CAS-46264-R1H9T6	Complaint	Quality Of Service	480-120-166(6)	21
278	3/14/2024 15:24	CAS-45087-Y8G6H8	Complaint	Quality Of Service	480-120-166(8)	21
279	10/14/2024 23:22	CAS-46760-D7C5N0	Complaint	Quality Of Service	480-120-166(6)	21
280	10/15/2024 18:35	CAS-46584-Q9X5Z0	Complaint	Quality Of Service	480-120-166(8)	21
281	4/5/2024 20:54	CAS-45781-F0K0K4	Complaint	Quality Of Service	480-120-166(4)(b)	21
282	1/27/2025 20:43	CAS-47209-K0C7M7	Complaint	Quality Of Service	480-120-166(8)	22
283	10/9/2024 15:00	CAS-46675-R9C7W4	Complaint	Quality Of Service	480-120-166(6)	22
284	4/12/2024 20:39	CAS-45377-M2V3X4	Complaint	Quality Of Service	480-120-166(8)	22
285	4/23/2024 22:40	CAS-45769-F4T3G9	Complaint	Quality Of Service	480-120-166(8)	22
286	12/11/2024 17:35	CAS-45583-D6J8H8	Complaint	Quality Of Service	480-120-166(8)	22
287	12/2/2024 20:33	CAS-47199-L4Y8D4	Complaint	Quality Of Service	480-120-166(4)(b)	22
288	4/4/2024 23:33	CAS-45123-Z3L6G5	Complaint	Quality Of Service	480-120-166(8)	23
289	5/8/2024 21:16	CAS-45993-Y3P8L2	Complaint	Quality Of Service	480-120-166(6)	23
290	7/18/2024 15:34	CAS-46426-R9M7S3	Complaint	Quality Of Service	480-120-166(6)	23
291	11/27/2024 23:43	CAS-47121-C2S0D7	Complaint	Quality Of Service	480-120-166(4)(b)	23
292	5/30/2024 19:11	CAS-46137-D9F4J9	Complaint	Quality Of Service	480-120-166(6)	23
293	11/18/2024 23:15	CAS-46485-Q3Z7T3	Complaint	Quality Of Service	480-120-166(6)	24
294	6/4/2024 18:36	CAS-44862-W1S4Z6	Complaint	Quality Of Service	480-120-166(4)(b)	24
		CAS-45332-				
295	8/7/2024 20:58	W1N5Q4	Complaint	Quality Of Service	480-120-166(8)	24
296	5/29/2024 19:26	CAS-45598-Y6N9H3	Complaint	Quality Of Service	480-120-166(6)	25
297	9/13/2024 17:24	CAS-46613-W8R7C3	Complaint	Quality Of Service	480-120-166(6)	25
298	10/30/2024 22:15	CAS-46883-L7H7S3	Complaint	Quality Of Service	480-120-166(4)(b)	25
299	10/8/2024 21:48	CAS-45819-H5G1K8	Complaint	Quality Of Service	480-120-166(6)	26
300	7/30/2024 17:46	CAS-46335-Z3D1L3	Complaint	Quality Of Service	480-120-166(6)	26
301	3/23/2024 17:29	CAS-45245-B1D6B0	Complaint	Quality Of Service	480-120-166(6)	26
302	5/2/2024 21:27	CAS-45198-Q6Q2L8	Complaint	Quality Of Service	480-120-166(8)	26
303	5/14/2024 15:30	CAS-45580-R8W1V2	Complaint	Quality Of Service	480-120-166(6)	27
304	11/22/2024 23:03	CAS-46763-L3W5M9	Complaint	Quality Of Service	480-120-166(8)	27
305	6/26/2024 22:42	CAS-46041-T3J1Y5	Complaint	Quality Of Service	480-120-166(8)	27
306	7/3/2024 17:58	CAS-46119-G0C3V4	Complaint	Quality Of Service	480-120-166(6)	27

# Attachment E

## Consumer Complaints

### Days Beyond Response Time Requirement

March 13, 2023, through January 31, 2025

307	11/13/2024 23:49	CAS-46978-Y4N7G0	Complaint	Quality Of Service	480-120-166(4)(b)	27
308	1/30/2025 23:38	CAS-47934-T5Z1F2	Complaint	Quality Of Service	480-120-411(1)(c)	27
309	7/18/2024 19:18	CAS-46326-T3J1N3	Complaint	Quality Of Service	480-120-166(4)(b)	28
310	12/12/2024 22:16	CAS-46464-F5L7Z6	Complaint	Quality Of Service	480-120-166(6)	28
311	5/16/2024 17:43	CAS-45144-T7Q8G5	Complaint	Quality Of Service	480-120-166(6)	28
312	7/22/2024 18:47	CAS-45092-D7B9Z7	Complaint	Quality Of Service	480-120-166(6)	28
313	3/14/2024 16:11	CAS-45216-P2X7F2	Complaint	Quality Of Service	480-120-166(6)	28
314	3/19/2024 17:35	CAS-45393-F8P7S3	Complaint	Quality Of Service	480-120-166(6)	28
315	10/23/2024 16:55	CAS-46032-S8Z1Y3	Complaint	Quality Of Service	480-120-166(8)	28
316	11/26/2024 23:26	CAS-46922-X3J2L9	Complaint	Quality Of Service	480-120-166(4)(b)	28
317	4/29/2024 23:03	CAS-45369-R8M9D5	Complaint	Quality Of Service	480-120-166(8)	29
318	4/25/2024 21:23	CAS-43013-G0V5K8	Complaint	Quality Of Service	480-120-166(8)	29
319	6/20/2024 17:58	CAS-46210-P6B5D5	Complaint	Quality Of Service	480-120-166(6)	29
320	4/4/2024 15:42	CAS-45486-H9G9V1	Complaint	Quality Of Service	480-120-166(4)(b)	29
321	1/3/2025 19:57	CAS-47271-Q7W7X8	Complaint	Quality Of Service	480-120-166(4)(b)	30
322	9/30/2024 21:55	CAS-46117-P4C2Z0	Complaint	Quality Of Service	480-120-166(6)	30
323	4/12/2024 22:56	CAS-45380-B0P1C5	Complaint	Quality Of Service	480-120-166(8)	30
324	4/16/2024 23:03	CAS-45385-W6R6S4	Complaint	Quality Of Service	480-120-166(8)	31
325	11/12/2024 22:49	CAS-46497-R5M5G5	Complaint	Quality Of Service	480-120-166(6)	31
326	4/17/2024 21:19	CAS-45704-Z4P4C2	Complaint	Quality Of Service	480-120-166(6)	31
327	5/16/2024 20:44	CAS-45957-S3X4T4	Complaint	Quality Of Service	480-120-166(6)	31
328	12/5/2024 21:59	CAS-47228-D0C1S1	Complaint	Quality Of Service	480-120-166(4)(b)	31
329	3/15/2024 15:08	CAS-45048-Z4F3G2	Complaint	Quality Of Service	480-120-166(9)	31
330	5/2/2024 22:39	CAS-45866-X7V3K8	Complaint	Quality Of Service	480-120-166(6)	32
331	5/10/2024 19:19	CAS-45519-X4N2V0	Complaint	Quality Of Service	480-120-166(6)	32
332	4/12/2024 16:47	CAS-45465-Q5C5P7	Complaint	Quality Of Service	480-120-166(6)	32
333	3/20/2024 16:17	CAS-45001-W0Q4C0	Complaint	Quality Of Service	480-120-166(6)	32
334	9/24/2024 17:50	CAS-46278-B9V5Y0	Complaint	Quality Of Service	480-120-166(6)	32
335	9/9/2024 21:20	CAS-46624-D6M7J4	Complaint	Quality Of Service	480-120-166(6)	33
336	12/20/2024 23:15	CAS-47167-C5M6S2	Complaint	Quality Of Service	480-120-166(4)(b)	33
337	5/31/2024 17:18	CAS-46065-X2G3V3	Complaint	Quality Of Service	480-120-166(6)	33
338	12/11/2024 21:41	CAS-47156-S5R2R7	Complaint	Quality Of Service	480-120-166(4)(b)	33
339	11/19/2024 23:44	CAS-45294-J2B6B3	Complaint	Quality Of Service	480-120-166(4)(b)	33
340	4/16/2024 19:07	CAS-45210-F9B4S5	Complaint	Quality Of Service	480-120-166(6)	34
341	6/25/2024 21:13	CAS-45968-G3R9S4	Complaint	Quality Of Service	480-120-166(8)	34
342	12/17/2024 1:03	CAS-47297-G4F5S1	Complaint	Quality Of Service	480-120-166(4)(b)	34
343	5/30/2024 21:26	CAS-46053-Z6G8Y6	Complaint	Quality Of Service	480-120-166(6)	34
344	5/23/2024 22:51	CAS-45602-X1Z4G6	Complaint	Quality Of Service	480-120-166(6)	35
345	4/25/2024 21:03	CAS-45730-G8S5C6	Complaint	Quality Of Service	480-120-166(6)	35
346	3/25/2024 20:43	CAS-45021-Y3W4P7	Complaint	Quality Of Service	480-120-166(6)	35
347	11/15/2024 22:02	CAS-46921-H0C8M4	Complaint	Quality Of Service	480-120-166(4)(b)	35
348	1/3/2025 18:38	CAS-47188-N9G8M4	Complaint	Quality Of Service	480-120-166(4)(b)	36
349	1/24/2025 23:21	CAS-47295-N1B1X6	Complaint	Quality Of Service	480-120-166(4)(b)	36
350	4/23/2024 22:49	CAS-45427-J6Z3X7	Complaint	Quality Of Service	480-120-166(6)	36
351	4/16/2024 21:09	CAS-44733-F0L9Q0	Complaint	Quality Of Service	480-120-166(8)	37
352	7/22/2024 16:54	CAS-44927-Y3W3M0	Complaint	Quality Of Service	480-120-166(8)	37

# Attachment E

## Consumer Complaints

### Days Beyond Response Time Requirement

March 13, 2023, through January 31, 2025

353	6/4/2024 22:23	CAS-45171-F3Y5H9	Complaint	Quality Of Service	480-120-166(8)	37
354	8/16/2024 22:09	CAS-44896-Z9B7L8	Complaint	Quality Of Service	480-120-166(8)	38
355	4/2/2024 21:02	CAS-45118-B0M5P2	Complaint	Quality Of Service	480-120-166(6)	38
356	6/5/2024 15:48	CAS-44862-W1S4Z6	Complaint	Quality Of Service	480-120-166(8)	38
357	7/16/2024 19:11	CAS-46282-N0F1G8	Complaint	Quality Of Service	480-120-166(6)	38
358	4/9/2024 21:17	CAS-45109-T9J5V3	Complaint	Quality Of Service	480-120-166(6)	39
359	6/14/2024 23:37	CAS-45772-R9G3G4	Complaint	Quality Of Service	480-120-166(6)	39
360	5/16/2024 17:40	CAS-45144-T7Q8G5	Complaint	Quality Of Service	480-120-166(6)	40
361	5/2/2024 22:31	CAS-45806-X9S9Q2	Complaint	Quality Of Service	480-120-166(6)	40
362	5/7/2024 21:09	CAS-45451-S3Z8M4	Complaint	Quality Of Service	480-120-166(6)	41
363	4/29/2024 22:39	CAS-45565-S6H4L0	Complaint	Quality Of Service	480-120-166(8)	42
364	5/7/2024 21:39	CAS-45549-B8C1P9	Complaint	Quality Of Service	480-120-166(6)	42
365	8/19/2024 15:57	CAS-45409-T3H2S5	Complaint	Quality Of Service	480-120-166(8)	43
366	12/12/2024 21:48	CAS-47054-S3V7G0	Complaint	Quality Of Service	480-120-166(6)	44
367	5/29/2024 21:29	CAS-45379-L6Y1Y9	Complaint	Quality Of Service	480-120-166(8)	44
368	9/27/2024 22:21	CAS-46587-G7N6C9	Complaint	Quality Of Service	480-120-166(4)(b)	44
369	4/9/2024 0:24	CAS-45175-G9F0G3	Complaint	Quality Of Service	480-120-166(8)	44
370	6/6/2024 19:11	CAS-45200-S6H3H6	Complaint	Quality Of Service	480-120-166(6)	45
371	6/10/2024 21:33	CAS-45899-D1L4X3	Complaint	Quality Of Service	480-120-166(8)	45
372	4/10/2024 22:41	CAS-45406-B7J3X2	Complaint	Quality Of Service	480-120-166(6)	47
373	8/14/2024 0:09	CAS-45047-Z6Q7T6	Complaint	Quality Of Service	480-120-166(4)(b)	47
374	5/9/2024 20:58	CAS-45294-J2B6B3	Complaint	Quality Of Service	480-120-166(6)	49
375	10/23/2024 16:53	CAS-46032-S8Z1Y3	Complaint	Quality Of Service	480-120-166(6)	49
376	9/19/2024 17:34	CAS-46204-Z2D1G8	Complaint	Quality Of Service	480-120-166(6)	51
377	10/3/2024 23:03	CAS-46632-Z1M6L1	Complaint	Quality Of Service	480-120-166(6)	53
378	12/5/2024 18:14	CAS-45768-B9F2P2	Complaint	Quality Of Service	480-120-166(8)	53
379	7/10/2024 0:39	CAS-45307-P6W4M8	Complaint	Quality Of Service	480-120-166(6)	54
380	5/22/2024 22:53	CAS-45673-C3J7L2	Complaint	Quality Of Service	480-120-166(6)	55
381	5/22/2024 22:41	CAS-45744-Y3D2Q8	Complaint	Quality Of Service	480-120-166(6)	56
382	5/2/2024 17:28	CAS-45507-R6Z3L7	Complaint	Quality Of Service	480-120-166(6)	57
383	9/10/2024 21:44	CAS-46294-P3P2J7	Complaint	Quality Of Service	480-120-166(4)(b)	57
384	5/10/2024 15:13	CAS-45400-K1L4R0	Complaint	Quality Of Service	480-120-166(8)	58
385	6/21/2024 17:09	CAS-45955-V4M3V1	Complaint	Quality Of Service	480-120-166(6)	58
386	7/30/2024 22:03	CAS-46096-X2C1V8	Complaint	Quality Of Service	480-120-166(6)	59
387	6/21/2024 19:16	CAS-44872-Q1D7G0	Complaint	Quality Of Service	480-120-166(4)(b)	60
388	5/2/2024 17:05	CAS-44468-J3N8D8	Complaint	Quality Of Service	480-120-166(8)	60
389	9/6/2024 22:26	CAS-46095-X8H7T6	Complaint	Quality Of Service	480-120-166(6)	60
390	1/24/2025 22:19	CAS-47016-F7S3G1	Complaint	Quality Of Service	480-120-166(4)(b)	61
391	6/6/2024 23:13	CAS-45714-P3G5V8	Complaint	Quality Of Service	480-120-166(6)	61
392	5/10/2024 16:56	CAS-45463-N5Y2Q9	Complaint	Quality Of Service	480-120-166(8)	61
393	9/27/2024 17:25	CAS-45266-W1P8F0	Complaint	Quality Of Service	480-120-166(6)	62
394	12/4/2024 20:24	CAS-45238-M2B2M1	Complaint	Quality Of Service	480-120-166(8)	62
395	9/3/2024 23:26	CAS-46199-Y8Y9D6	Complaint	Quality Of Service	480-120-166(4)(b)	62
396	7/10/2024 16:51	CAS-45092-D7B9Z7	Complaint	Quality Of Service	480-120-166(8)	63
397	10/21/2024 21:35	CAS-46114-D0B1D1	Complaint	Quality Of Service	480-120-166(6)	67
398	9/16/2024 20:57	CAS-46232-Q7P4K1	Complaint	Quality Of Service	480-120-166(4)(b)	68

# Attachment E

## Consumer Complaints

### Days Beyond Response Time Requirement

March 13, 2023, through January 31, 2025

399	5/13/2024 23:22	CAS-45407-R9G3Z7	Complaint	Quality Of Service	480-120-166(6)	70
400	9/23/2024 21:01	CAS-46257-T1R7N7	Complaint	Quality Of Service	480-120-166(6)	70
401	6/27/2024 21:08	CAS-45508-N4F2G7	Complaint	Quality Of Service	480-120-166(4)(b)	71
402	5/20/2024 16:24	CAS-44889-D3P8L2	Complaint	Quality Of Service	480-120-166(6)	71
403	8/29/2024 21:50	CAS-45671-T3D5D9	Complaint	Quality Of Service	480-120-166(8)	72
404	7/11/2024 18:54	CAS-45873-R6W2J4	Complaint	Quality Of Service	480-120-166(6)	74
405	9/16/2024 23:21	CAS-46193-C0X3P4	Complaint	Quality Of Service	480-120-166(4)(b)	77
406	1/24/2025 22:01	CAS-46867-J9Z1W0	Complaint	Quality Of Service	480-120-166(4)(b)	78
407	1/23/2025 19:46	CAS-46837-Q5L7C4	Complaint	Quality Of Service	480-120-166(4)(b)	80
408	1/2/2025 21:17	CAS-46829-H7S4W6	Complaint	Quality Of Service	480-120-166(4)(b)	82
409	7/5/2024 0:59	CAS-44945-M7P3X1	Complaint	Quality Of Service	480-120-166(8)	83
410	9/3/2024 18:08	CAS-45945-Z7B4P1	Complaint	Quality Of Service	480-120-166(6)	84
411	12/5/2024 1:12	CAS-45238-M2B2M1	Complaint	Quality Of Service	480-120-166(8)	89
412	7/19/2024 16:34	CAS-45014-J5D0D5	Complaint	Quality Of Service	480-120-166(6)	102
413	9/16/2024 16:27	CAS-45722-W8C1J3	Complaint	Quality Of Service	480-120-166(6)	105
414	8/26/2024 18:48	CAS-45768-B9F2P2	Complaint	Quality Of Service	480-120-166(6)	120
415	10/16/2024 0:16	CAS-45710-P9X3K9	Complaint	Quality Of Service	480-120-166(6)	157
416	12/10/2024 22:05	CAS-45791-W4W6T0	Complaint	Quality Of Service	480-120-166(8)	173

**8008**

# Attachment F

**Washington State Complaint: CAS-46698-W1P0P4**

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**Company: CenturyLink Communications LLC**

**Industry: Telecommunications**

**Customer:** [REDACTED]

**Alt Contact:**

**Account Number:** [REDACTED]

**Service Phone:** [REDACTED]

**E-mail Address:** [REDACTED]

**Service Address:** [REDACTED]

**Complaint: CAS-46698-W1P0P4**

**Type: Complaint**

**Serviced By: Sheri Hoyt**

**Grouped By: Quality Of Service**

**Opened On: 7/25/2024, 9:35:00 AM**

**Closed On: 2/10/2025, 3:46:48 PM**

**Disposition: Consumer upheld**

**Violations Total: 175**

**TA Total: 0**

**Amount Customer Saved: \$765.32**

**Description:**

The customer has contacted CenturyLink several times in the past six months to report that they have experienced dial-tone and internet outages or noise on their line. CenturyLink dispatched a technician recently who was not able to repair the line, but informed the customer that the lines had been vandalized. The phone utility box located up the street from the customer's premises has wires hanging outside the box and the cover is missing. The customer has contacted CenturyLink several times and also spoken to a supervisor, but no repairs have been completed to date. Several repair appointments have

been canceled or missed. The most recent date CenturyLink gave the customer for repair was July 25, 2024, but a technician never arrived to complete the repairs. The customer sent an update to CenturyLink through text, that their service had not been restored. The customer checked the box, which was still in same state as it had been when the issue was initially reported to the company. The customer asserted that CenturyLink should dispatch a technician or a crew to complete the necessary repairs to its facilities to restore their dial-tone, immediately.

Please provide a narrative response to all allegations stated in the complaint Description. Responses should include actions the company took to address each of the stated allegations, or why action was not taken, and other information such as account or billing history, bill copies, repair request records, etc.

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**Activity Type: Phone Call**

**Activity Date: 10/11/2024, 8:00:00 AM**

**Direction: Incoming**

**Customer: Dan Bradley**

**UTC POC: Sheri Hoyt**

**Subject: [Customer Called](#)**

**Description:**

The customer called identifying himself and the purpose of his call. They provided an update that CenturyLink did not repair their landline on Oct. 10, 2024 when they notified the customer that they would do so. They report they have been provided many repair dates that do not occur. They state their missed repair dates were Jul 13, 23, 25, Aug. 7, Sept 6, 9, 13, 17, 24, Oct. 8 and 10, 2024. They are wanting accurate information about their repair dates. They thanked me for my time and we ended the call.

# Attachment G

**Washington State Complaint: CAS-46667-P1R4T9**

**Company: CenturyLink Communications LLC**

**Industry: Telecommunications**

**Customer:** [REDACTED]

**Alt Contact:**

**Account Number:** [REDACTED]

**Service Phone:** [REDACTED]

**E-mail Address:**

**Service Address:** [REDACTED]

**Complaint: CAS-46667-P1R4T9**

**Type: Complaint**

**Serviced By: Kimberly Chabot**

**Grouped By: Quality Of Service**

**Opened On: 7/22/2024, 2:35:00 PM**

**Closed On: 9/23/2024, 4:09:33 PM**

**Disposition: Consumer upheld**

**Violations Total: 50**

**TA Total: 0**

**Amount Customer Saved: \$132.98**

**Description:**

The customer contacted CenturyLink to report they had no dial-tone since approximately June 17, 2024. CenturyLink gave the customer a repair commitment date of July 4, 2024, which was missed. CenturyLink informed the customer it would dispatch a technician to their premises after they contacted it a second time. On July 13, 2024, the technician arrived to their premises, confirmed the customer had no dial-tone, and the cause was CenturyLink's equipment. The customer contacted CenturyLink a third time on July 15, 2024, to report they continued to have no dial-tone, but the issue has not been resolved.

Please provide a narrative response to all allegations stated in the complaint Description. Responses should include actions the company took to address each of the stated allegations, or why action was not taken, and other information such as account or billing history, bill copies, repair request records, etc.

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**Activity Type: Email**

**Activity Date: 7/24/2024, 11:22:05 AM**

**To: kimberly.chabot@utc.wa.gov;**

**From: uswpuc@centurylink.com**

**Subject: RE: WA UTC Complaint URGENT CAS-46667-P1R4T9?for [REDACTED]**

**CRM:0407004 [ ref:!00D4102HUz0.!500VW0D9dM2:ref ]**

**Attachments: 0**

**Body:**

External Email

Hi Kimberly, This customer has an open repair ticket with a current dispatch date of 07/29/2024. Ticket ID#: **0321846** Status: **Assigned** Ticket Information: Created On: 06/26/2024 1:07 PM

The tech log notes confirm we have rescheduled this dispatch a few times due to our technicians workload not being able to complete the repair. This has also been referred to our cable department for resolution. I will have another update once this ticket has been completed.

There aren't any other repair tickets show under this account.

Extension request 07/30/2024

Regards, Corey Tidwell Case Manager Customer Advocacy Group Office : 208-207-2236

Corey.Tidwell@Lumen.com



**Washington State Complaint: CAS-46693-G8B6L2**

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**Company: CenturyLink Communications LLC**

**Industry: Telecommunications**

**Customer:** [REDACTED]

**Alt Contact:** [REDACTED]

**Account Number:**

**Service Phone:** [REDACTED]

**E-mail Address:** [REDACTED]

**Service Address:** [REDACTED]

**Complaint: CAS-46693-G8B6L2**

**Type: Complaint**

**Serviced By: Liz Dijos**

**Grouped By: Delayed Service**

**Opened On: 7/25/2024, 11:10:48 AM**

**Closed On: 12/6/2024, 1:51:24 PM**

**Disposition: Consumer upheld**

**Violations Total: 182**

**TA Total: 0**

**Amount Customer Saved: \$448.12**

**Description:**

The complainant is authorized on the customer's account and filed the complaint on the customer's behalf. The customer's phone service has been out of service since June 8, 2024. The complainant reported the outage via online chat about a week later. Every time the complainant goes online to check the status of the service repair, the system shows a repair date for the next day, but the repair has never been completed. The customer's wife had a medical emergency on July 24, 2024, and couldn't reach 911 emergency services as cellular service in their area isn't good. The complainant was told by a CenturyLink

representative that they couldn't be credited until service was restored. The complainant is concerned that if they don't pay for the non-working phone service, past due balances will be sent to collections. The complainant gave permission to CenturyLink to contact them at 206-228-6444 or Raina.richart@gmail.com.

Please provide a narrative response to all allegations stated in the complaint Description. Responses should include actions the company took to address each of the stated allegations, or why action was not taken, and other information such as account or billing history, bill copies, repair request records, etc.