

**Exh. SB-20
Docket UT-240029
Witness: Sean Bennett**

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of the Petition of the

DOCKET UT-240029

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

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

EXHIBIT TO TESTIMONY OF

SEAN BENNETT

**STAFF OF
WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION**

CenturyLink's Response to UTC Staff DR. No. 48

April 3, 2024

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March 6, 2024
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Lumen, by and through its counsel hereby objects and responds to UTC Staff Data Request No 48:

GENERAL OBJECTIONS

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

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

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

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

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

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

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UTC STAFF DATA REQUEST NO. 48:

Referencing Weisman, Exh. DLW-1T at page 12, lines 8-10, provide the following information for each of the "approximately 800" customers in the "protected customers" class that CenturyLink has identified: Customer Name; Customer Address; Serving Wire Center; Class of Service provided by CenturyLink; and the customer location in a shapefile or other widely accepted GIS format."

RESPONSE:

See Attachment Staff 48(C), which plots the location of the approximately 800 "protected customers." Please note that the map likely overstates the number of "protected customers" due to the fact that numerous customers living on or near the coast in the San Juan Islands are identified as not having access to CMRS services (due to limitations in the FCC's hexagon reporting) when in fact they likely do have CMRS coverage at their locations. It appears that publicly available data excludes hexagons that primarily consist of water; this limitation excludes the presence of CMRS service coverage for some locations on the coastline itself.

Respondent: Peter Gose, Director State and Local Government Affairs
(peter.gose@lumen.com; 303-324-5678)
Jacob Barlow, Government Operations Manager
(Jacob.barlow@lumen.com; 303-707-7004)