

**Exh. SB-19
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 First Supplemental Response to UTC Staff DR. No. 47

April 3, 2024

Docket UT-240029
Lumen's Responses to UTC Staff Data Request Nos. 56-57 and
Supplemental Requests for 19, 47 and 48
March 22, 2024
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FIRST SUPPLEMENTAL TO UTC STAFF DATA REQUEST NO. 47:

Staff's original DR No. 47-a had sought additional data for the CenturyLink subscribers enumerated in the Competition Study's "Access Line Count Data (C)" tab – which consisted of VOIP and Voice lines provided by CenturyLink's ILECs and CLECs as-of 6/30/22 and 6/30/23. CenturyLink objected that the DR required a special study. Please:

- a. Explain why Staff's Data Request required a special study given the competition study and the work necessary to identify CenturyLink's protected customers; and
- b. Provide the locations of all Voice subscribers served by the CenturyLink ILECs as-of 6/30/23, disaggregated by Customer Segment (Business, Consumer, Wholesale), in a shape file (.shp) or other widely accepted GIS format. If responding to this request would require a special study, then in the alternative provide the customer names and addresses of all Voice subscribers served by the CenturyLink ILECs as-of 6/30/23, disaggregated by Customer Segment (Business, Consumer, Wholesale), in electronic format (e.g. Excel spreadsheet). Note that for the Wholesale segment the end user's name and address should be provided, not the CLEC purchasing the Wholesale service.

RESPONSE:

- a. See Attachment Staff 47a1(C), a zip file containing the shapefile of the CenturyLink ILECs' voice and VoIP customers in Washington. Please note that approximately 900 customer locations could not be mapped in the shapefile; those are listed in Attachment Staff 47a2(C). See also Attachment Staff 47a3(C), an XLS format containing the same voice/VoIP customer information.
- b. See response to subpart a.

Respondent(s): Peter Gose, Director State and Local Government Affairs
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