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State Of WASH.
UTIL. AND TRANSP.
COMMISSION

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Philip E. Grate
State Regulatory Affairs Director
Public Policy

March 25, 2020

Transmitted Via Web Portal Only

Mr. Mark Johnson
Executive Director and Secretary
Washington Utilities & Transportation Commission
1300 S. Evergreen Park Drive SW
P.O. Box 47250
Olympia, Washington 98504-7250

**Re: Docket UT-132234, Order 03
Compliance Filing associated with San Juan Islands; Technical
Agreement; Measurement, Maintenance and Inspection**

Dear Mr. Johnson,

In compliance with the terms of the Revised Settlement Agreement between CenturyLink, Staff and Public Counsel, approved by the Commission in its Order 03 in the above-referenced docket, this letter and its attachments serve as CenturyLink's annual report of the results of all inspections and maintenance performed during the preceding calendar year for both underwater fiber cable and the microwave systems pursuant to the San Juan Islands Annual Measurement, Maintenance and Inspection Technical Agreement. At paragraph 16, Order 03 provides:

Specifically, by virtue of a series of mandatory inspection and reporting obligations, CenturyLink is required to submit annual inspection plans for the San Juan Submarine Facilities to the Commission, by November 30 of each year, reporting with specificity on its exact plans for conducting inspections of the submarine fiber optic system for the subsequent calendar year. The inspection plans will contain the locations of the facilities to be inspected and the precise frequency and manner in which the inspections will be conducted. Subsequent to each year's inspections, the Company agrees to report by March 31 of the following year, the results of all inspections and maintenance performed during the preceding calendar year for both underwater fiber cable and the microwave systems. (footnotes omitted)

This report includes seven attachments as follows:

Attachment 1 provides the required information related to inspection and maintenance functions performed on the company's submarine fiber cable facilities in 2019. The information provided in Attachment 1 is the results of CenturyLink's 2019 submarine cable inspection the plan for which is described in CenturyLink's November 2, 2018 filing in this docket.

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Attachments 2, 3 4 and 5 are reports of the inspections of microwave radio towers at the Bellingham central office, the Friday Harbor central office the Mt. Constitution North radio site and the Mt. Constitution South radio site. CenturyLink conducted these inspections in accordance with its current Antenna and Tower Routine Inspection, which was outlined in Appendix A to the Settlement Agreement. CenturyLink did not change its Antenna and Tower Routine Inspection procedure.

Attachment 6 is screen shots of tests of the radio signals between Friday Harbor and Mt. Constitution, Mt. Constitution and Friday Harbor and Mt. Constitution and Bellingham. Note that we are providing the most current tests available, which were performed earlier this year.

The San Juan microwave systems continue to provide redundant capacity between the island customers and the host switch in Friday Harbor and between Friday Harbor and Bellingham, Washington. The systems have sufficient capacity to maintain CenturyLink's intrastate voice and critical services traffic on a diverse route between the islands and the mainland at normal call volumes.

If you have any questions regarding the enclosed, please don't hesitate to call me.

Sincerely,

A handwritten signature in black ink that reads "Philip E. Grate". The signature is written in a cursive style with a long horizontal flourish extending to the right.

Philip E. Grate