

**BEFORE THE WASHINGTON
UTILITIES & TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,

Complainant,

v.

CENTURYLINK COMMUNICATIONS, LLC,

Respondent.

DOCKET UT-181051

BRIAN ROSEN

**ON BEHALF OF THE
WASHINGTON STATE OFFICE OF THE ATTORNEY GENERAL
PUBLIC COUNSEL UNIT**

Exhibit BR-10

WMD Fourth Supplemental Response to CenturyLink Data
Request No. 4, Attachment 'RE CenturyLink Outage
122718 (58)

December 15, 2021

UTC v. CenturyLink, Docket UT-181051
WMD Fourth Supplemental Responses to CenturyLink
Communications, LLC Data Requests CTL-1–CTL-4
October 18, 2021
Page 4 of 6

Date Prepared: July 29, 2021

Prepared by: Dawn Cortez

Witness: none

Phone No: 360-586-2436

SUPPLEMENTAL RESPONSE NO. 3:

Subject to and without waiving the above objections, SECO provides the requested exemption log of communications WMD has had with Public Counsel Unit regarding the Outage, which can be found at <https://sft.wa.gov/> – User Name: atg-tpc-php, by using the same password as previously provided.

Date Prepared: August 6, 2021

Prepared by: Dawn Cortez

Witness: none

Phone No: 360-586-2436

CTL-4 Identify (by date, method (written or verbal), location and participants) all communications between WMD and Commission Staff regarding the Outage. For clarity, this request seeks information pertaining to communications that precede the filing of the complaint herein and communications that occurred (or occur in the future) after the filing of the complaint herein. Further, for purposes of this request, any communications regarding this case should likewise be identified and described. Separately for each such communication, provide a detailed description and summary of all matters discussed and produce all written communications and other documents pertaining to such communication.

OBJECTION: SECO objects to the request as vague, overbroad, unduly burdensome. Further, it requires the creation of a record of oral communication that is not already in existence since most of the requested communications were oral and not recorded. Additionally, the information requested is not likely to lead to the discovery of admissible evidence, or the production of information that is relevant. SECO further objects to providing or identifying communication regarding the Outage between SECO and the Commission Staff on or after January 14, 2021 as attorney-client privileged communications and protected work-product pursuant to a common interest agreement.

SECO is not identifying or providing information about communications after that date. The SECO and Commission Staff have participated in communications, exchanged pleadings, and data responses as a party to this regulatory matter, which have included all parties, and is not duplicating these communications as they have also been provided to CTL as a party to this matter.

Finally, given the broad nature of CTL- 4, SECO staff is still in the process of reviewing records for responsive material and will provide additional responses by July 23, 2021.

UTC v. CenturyLink, Docket UT-181051
WMD Fourth Supplemental Responses to CenturyLink
Communications, LLC Data Requests CTL-1–CTL-4
October 18, 2021
Page 5 of 6

RESPONSE: Subject to and without waiving the above objections, SECO provides the records contained in the attached link: <https://sft.wa.gov/> – User Name: atg-tpc-php.

SUPPLEMENTAL RESPONSE:

Subject to and without waiving any of the above objections, SECO has identified new communications that may be responsive to this request and are not included in the common interest agreement between SECO and Commission Staff. SECO provides the records at: <https://sft.wa.gov/>, in the folder with the same user name and password as previously provided.

Further, pursuant to discussion with counsel for CTL, SECO is preparing a data response log that it intends to produce by July 29, 2021.

Date Prepared: July 23, 2021

Prepared by: Cynthia Whaley
William Andrew Leneweaver
Kenneth Moisey
Adam R. Wasserman
Dawn Cortez

Witness: Cynthia Whaley
William Andrew Leneweaver
Kenneth Moisey
Adam R. Wasserman

Phone No: Represented by Dawn Cortez – 360-586-2436

SUPPLEMENTAL RESPONSE NO. 2:

In addition to the records already provided that contain and describe communications between WMD and Commission Staff regarding the Outage, additional records are provided at the same SFT link and include calendar invitations to William Andrew Leneweaver for meetings at which the Outage was discussed, minutes from the meetings, and a spreadsheet of participants at the meetings.

Date Prepared: July 29, 2021

Prepared by: William Andrew Leneweaver
Dawn Cortez

Witness: William Andrew Leneweaver

Phone No: Represented by Dawn Cortez – 360-586-2436

SUPPLEMENTAL RESPONSE NO. 3:

Subject to and without waiving the above objections, SECO provides the requested exemption log of communications WMD has had with the Commission Staff regarding the Outage, which can be found at <https://sft.wa.gov/> – User Name: atg-tpc-php, by using the same password as previously provided.

UTC v. CenturyLink, Docket UT-181051
WMD Fourth Supplemental Responses to CenturyLink
Communications, LLC Data Requests CTL-1–CTL-4
October 18, 2021
Page 6 of 6

Date Prepared: August 6, 2021

Prepared by: Dawn Cortez

Witness: none

Phone No: 360-586-2436

SUPPLEMENTAL RESPONSE NO. 4:

In addition to the records already provided that contain and describe communications between WMD and Commission Staff regarding the Outage, newly located additional records are attached and include emails between WMD and others including Commission Staff regarding the Outage.

Date Prepared: October 18, 2021

Prepared by: Dawn Cortez

Witness: Cynthia Whaley, Adam Leneweaver, Adam Wasserman

Phone No: 360-586-2436

Mak, Chanda (ATG)

From: Leneweaver, William A (MIL)
Sent: Friday, December 28, 2018 7:01 AM
To: Beaton, Rebecca (UTC); Beaton, Rebecca (UTC); MIL DL E911 Outages
Subject: RE: CenturyLink outage 12/27/18

Categories: High

No, I am not aware of receiving any notification from CenturyLink. We have received several from Comtech...

Yes, the bridge is up...and you are more than welcome to join...

Andy

William Andrew Leneweaver

Deputy State 911 Coordinator for Enterprise Systems

Washington State 911 Coordination Office

Washington State Emergency Management Division

Washington Military Department

20 Aviation Drive, Camp Murray, WA 98430-5020

Email: andy.leneweaver@mil.wa.gov

Desk: 253-512-7039 | Mobile: 253-302-9214



911 Technical Assistance: e911technicalservices@mil.wa.gov

911 Outages: e911outages@mil.wa.gov | [800-258-5990](tel:800-258-5990) 

From: Beaton, Rebecca (UTC) <rebecca.beaton@utc.wa.gov>
Sent: Friday, December 28, 2018 6:52 AM
To: Leneweaver, William A (MIL) <Andy.Leneweaver@mil.wa.gov>; Beaton, Rebecca (UTC) <rebecca.beaton@utc.wa.gov>
Subject: RE: CenturyLink outage 12/27/18

Hi Andy,

Have you received an outage report from Comtech at any point regarding this outage?

Do you have the bridge up and may I jump in?

Thank you,
Rebecca Beaton
Regulatory Services,
Utilities and Transportation Commission
tel: 360.664.1287
cell: 360.464.7236
Rebecca.beaton@utc.wa.gov

Information may be confidential and use by other than addressee prohibited.

On December 28, 2018 at 6:43:15 AM PST, Leneweaver, William A (MIL) <Andy.Leneweaver@mil.wa.gov> wrote: Page 5 of 6

No Rebecca,

They all started going down again...we are trying to confirm

Andy

William Andrew Leneweaver

Deputy State 911 Coordinator for Enterprise Systems

Washington State 911 Coordination Office

Washington State Emergency Management Division

Washington Military Department

20 Aviation Drive, Camp Murray, WA 98430-5020

Email: andy.leneweaver@mil.wa.gov

Desk: 253-512-7039 | Mobile: 253-302-9214



911 Technical Assistance: e911technicalservices@mil.wa.gov

911 Outages: e911outages@mil.wa.gov | [800-258-5990](tel:800-258-5990) 

From: Beaton, Rebecca (UTC) <rebecca.beaton@utc.wa.gov>

Sent: Friday, December 28, 2018 6:41 AM

To: Wasserman, Adam R (MIL) <Adam.Wasserman@mil.wa.gov>; Roth, Jing (UTC) <jing.roth@utc.wa.gov>;

Leneweaver, William A (MIL) <Andy.Leneweaver@mil.wa.gov>; Beaton, Rebecca (UTC)

<rebecca.beaton@utc.wa.gov>

Subject: CenturyLink outage 12/27/18

William,

Thank you for speaking with me last night and early this morning. I spoke with CTL's Jacob Clow at 6:00 am and he informed me the 911 system was restored at approximately 3:30 am. Can you confirm all PSAPs are operational.

Thank you,

Rebecca Beaton
Regulatory Services,
Utilities and Transportation Commission
tel: 360.664.1287
cell: 360.464.7236
Rebecca.beaton@utc.wa.gov

Information may be confidential and use by other than addressee prohibited.