

**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-14

CenturyLink Response to Public Counsel Data Request No. 5, Attachment A, Second
Revised Washington State Outage Communications Plan of CenturyLink

December 15, 2021

PC-5 Please provide a copy of the communications plan stipulated to by UTC staff and the Company in Docket UT-132234.

RESPONSE:

The communications plan is appended as Exhibit A to Order No. 5 in Docket UT-132234, and can be found on the Commission's website.

Respondent: CenturyLink Legal

SECOND REVISED
Washington State Outage Communications Plan of
CenturyLink

INTRODUCTION

In accordance with the approved Settlement in the case, CenturyLink met with representatives from Commission Staff and Public Counsel to develop an emergency communications plan for use during major outages in Washington State consistent with the requirements of WAC 480-120-412.

WAC 480-120-412 regulates the actions of companies subject to the Commission's jurisdiction during Major Outages as that term is defined in WAC 480-120-021.

This document serves as CenturyLink's statewide communications plan for use by CenturyLink personnel during major outages in Washington ("Statewide Outage Communications Plan" or "SOCP"). The SOCP also provides the Commission, emergency management officials and the public an understanding of the communications to expect from CenturyLink in the event of a major outage of telephone service. The procedures set forth in the SOCP are intended to explain CenturyLink's communications procedures but are not intended to limit CenturyLink's ability or prerogative to communicate with the Commission, emergency management officials and/or the public in other ways and at other times not specified in the SOCP. These procedures are in addition to standard outage reporting procedures involving the Washington State Military Department.

GOAL/OBJECTIVE

The goal of the SOCP is for CenturyLink to make information about a major outage of telephone service in Washington available to the people who need to know that is as timely and accurate as reasonably possible so that they can plan for and adapt to the effects of the outage.

DEFINITIONS

"Communicator" is an organization within CenturyLink that is tasked with communicating pertinent information about a major outage to one or more target audiences. This SOCP identifies the following CenturyLink organizations as communicators:

1. **Community Relations & External Communications resides in CenturyLink's Brand Management, Corporate Communications & Investor Relations organization and is responsible for external communications through conventional and social media.**

2. **Network Events Management Center (NEMC)** resides in CenturyLink's Public Safety Services and NEMC organization and serves all states where CenturyLink provides telephone service.

The NEMC e-mails the Washington Utilities and Transportation Commission, the State E911 Coordinator's Office of the Emergency Management Division of the Washington Military Department **PUC reports** of major outages that contain the following pertinent information, as and when available:

Report Number
Impacted Company
Date and Time
Time Zone
For Questions Contact
Reason for Outage Notification
Cause of Outage
Location of Outage
Exchange Name / Wire Center
Expected Duration
Actual Duration
Number of Customers/ Cable pair impacted
Services Affected
Agencies Notified
Significant Update
Resolution
Restore Date/Time

3. **9-1-1 Network and Center Operations** residing in CenturyLink's Public Safety Services (PSS) organization. The 9-1-1- Network and Center Operations is responsible for, among other things, telephone service outage notifications to the State E911 Coordinator's Office of the Emergency Management Division of the Washington Military Department and Public Service Access Points (PSAPS) in all states where CenturyLink provides telephone service.

"Major outage" has the same definition as in WAC 480-120-021, which is:

1. A service failure lasting for thirty or more minutes that causes the disruption of local exchange or toll services to more than one thousand customers;
2. Total loss of service to a public safety answering point or emergency response agency;

3. Intercompany trunks or toll trunks not meeting service requirements for four hours or more and affecting service; or
4. An intermodal link blockage (no dial tone) in excess of five percent for more than one hour in any switch or remote switch.

“**Target audience**” is an organization or group of people that is interested in, affected by or has a need to know about a major outage. This SOCP defines the following target audiences:

1. The Washington Utilities and Transportation Commission;
2. State E911 Coordinator’s Office of the Emergency Management Division of the Washington Military Department;
3. Public Service Access Points (PSAPs);
4. The general public, including CenturyLink telephone service customers who are out of service.

COMMUNICATIONS PROCEDURES BY TARGET AUDIENCE

1. Washington Utilities and Transportation Commission.

CenturyLink communicates available pertinent information about major outages to the WUTC by e-mail distribution of PUC Reports issued by the NEMC. The NEMC updates the reports frequently until the outage is resolved.

2. State E911 Coordinator’s Office of the Emergency Management Division of the Washington Military Department.

CenturyLink communicates available pertinent information about major outages to the State E911 Coordinator’s Office by e-mail distribution of PUC Reports issued by the NEMC. The NEMC updates the reports frequently until the outage is resolved.

3. Public Service Access Points (PSAPs).

In compliance with federal regulations, CenturyLink communicates available pertinent telephone service outage information to potentially affected PSAPs by e-mail notification and, when possible, contact by telephone.

Although communication with PSAPS is governed by federal regulations that establish protocols and requirements for outage notification to PSAPs nationwide, CenturyLink will modify its outage notification system so that it provides e-mail notification to PSAPs of major outages as defined in WAC 480-120-021. The system will identify major

outages by Common Language Location Identifier (CLLI) code¹ and notify all PSAPs served in that CLLI of a major outage in the CLLI. CenturyLink anticipates completing the modification by June 30, 2016.

4. The general public including CenturyLink telephone service customers who are out of service.

CenturyLink does and will communicate information about prolonged and widespread telephone service outages to the public through use of conventional media, social media and monitor media targeted to affected communities to the extent possible and as warranted. Examples of the targeted communications are provided in Appendix A.

Conventional media outlets include:

- Radio stations
- Television stations
- Newspapers
- Local Media (blogs, etc)

Social Media outlets include:

- Facebook (geo-targeted to the state)
- Twitter (geo-targeted to the state)

In addition CenturyLink maintains a website called “Service Troubleshooter” that provides residential telephone service customers information about their particular telephone service. Customers who access the website and input their account or billing telephone number and ZIP code can find out if their telephone service is out and if a repair ticket for the service is open. They may also opt into a notification by their choice of text, e-mail or telephone call to a telephone number of their choosing when service is restored.

In the event of a prolonged major outage, defined as a Major Outage lasting more than 72 hours, CenturyLink can establish a special website that provides information about the outage to its customers and the public. Known as a Dark Site, this website is able to provide:

¹ CLLI is a standardized way of describing locations and significant pieces of hardware at those locations. The short eight-character CLLI is broken down as follows: The first four describe the city; the next two are the state, the last two are a specific office in that city and state.

- Any available facts about what happened as part of an opening or initial statement describing the crisis event and the organization's response.
- Any relevant special instructions regarding the outage.
- What steps are being taken to get the situation back to normal.
- Relevant background information describing the organization, the causes, nature and likely impact of the crisis; in short, anything that promotes clear understanding of the situation.
- Contact information for the news media.

In addition to the foregoing, CenturyLink may communicate with communities of interest as conditions warrant through other means, including, but not limited to, e-mail updates, conference calls, or in person meetings with government officials and members of the community. These ad hoc communications occur as and when CenturyLink determines unique circumstances call for additional communication about an outage.

Appendix A

Communications to the public through traditional, social and monitor media

Key Messages

This appendix contains key messages which are the pertinent information that is important to communicate to target audiences. Key messages are the broad overall messages that can be tailored to a specific event.

Communications Timing

Corporate Communications distributes notifications and updates on the specific outage situation to media described in the media distribution below.

The frequency of communications will vary depending on the severity of the outage, but should be delivered at least once every 24 hours throughout the event.

Unplanned Outage

Media Distribution

- **Traditional Media** – updates provided to media in impacted markets and on a reactive basis to other media outlets.
- **Social Media** – updates posted to Facebook and Twitter (Geo targeting impacted areas).
- **Monitor Media** – leverage Hootsuite and #hashtag where applicable.

Traditional media messaging

“CenturyLink technicians continue to work around the clock in (STATE or REGION) to repair residential and business services impacted by (TYPE of OUTAGE – If known)”. *(For weather-related outages, provide situational information including generator use, locations with restored service, locations hardest hit, ETR – if known, phone numbers to call to report outages or to activate Emergency Call Forwarding.)* We apologize for any inconvenience this has created for our customers.”

Facebook post

“CenturyLink technicians continue to work around the clock in (STATE or REGION) to repair residential and business services impacted by (TYPE of OUTAGE – If known). We apologize for any inconvenience this has created for our customers.” *(For weather-related outages, provide situational information including generator use, locations with restored service, locations hardest hit, ETR – if known, phone numbers to call to report outages or to activate Emergency Call Forwarding.)*

Twitter post

“CenturyLink technicians continue to work around the clock in (STATE or REGION) to repair services impacted by (TYPE of OUTAGE – If known).” *Additional posts for weather-related outages could also include: (Situational information including generator use, locations with restored service, locations hardest hit, ETR – if known, phone numbers to call to report outages or to activate Emergency Call Forwarding.)*

Calls to Actions can include

- Advising customers to call the number on their bill and select the “repair” prompt during the automated options. Website for customer inquiry in the case of an outage to be notified by text, email, phone for updates
- Local Emergency Management in the case of 911 impacted (Fire/Police)

Unplanned Post-Event Reactive Response (resolution messaging)

Media Distribution

- **Traditional Media** – updates provided to media in impacted markets and on a reactive basis to other media outlets
- **Social Media** – updates posted to Facebook and Twitter (Geo targeting impacted areas)
- **Monitor Media**- leverage hootsuite and #hashtag where applicable

Traditional Media Messaging

“Due to a (fiber cut/equipment malfunction) on (DATE), CenturyLink customers in (STATE or REGION) may have experienced disruptions to their services. CenturyLink technicians worked quickly to identify and restore impacted services. All services were restored on/by (TIME/DATE). CenturyLink is committed to providing reliable services to its customers and we apologize for any inconvenience this may have caused our customers.”

Facebook post

“Due to a (fiber cut/equipment malfunction) on (DATE), CenturyLink customers in (STATE or REGION) may have experienced disruptions to their services. CenturyLink technicians worked quickly to identify and restore impacted services. All services were restored on/by (TIME/DATE). We apologize for any inconvenience this may have caused our customers.”

Twitter post:

“CenturyLink has restored services in (STATE or REGION) due to a (REASON). We apologize to customers for the inconvenience.”