

**BEFORE THE WASHINGTON  
UTILITIES & TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,

Complainant,

v.

CENTURYLINK COMMUNICATIONS, LLC,

Respondent.

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DOCKET UT-181051

**BRIAN ROSEN**

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

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**Exhibit BR-21C**

CenturyLink Response to WMD Data Request No. 1 with Confidential Attachments  
CLC-002938, CLC-003101, and CLC-003102

**December 15, 2021**

**Shaded Information is Designated Confidential  
per Protective Order in Docket UT-181051**

REDACTED VERSION

CenturyLink Communications, LLC ("CLC"), by and through its counsel hereby objects and responds to the First Set of Data Requests of the Washington Military Department ("WMD") as follows:

### **GENERAL OBJECTIONS**

CLC incorporates the following general objections into the data request responses below:

1. CLC objects to these data requests to the extent that they seek or purport 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. CLC objects to any data request or instruction that purports to require more than is required by the applicable rules of the Commission.
3. CLC objects generally to these data requests to the extent (i) that the information requested is known to WMD or its 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 WMD or its counsel from sources other than CenturyLink.
4. CLC objects to these data requests to the extent that they are overly broad, vague and ambiguous, unduly burdensome, and calling for information that is irrelevant or not proportional to the needs of the case.
5. These responses are provided on the basis of the best information currently available to CLC after diligent effort to gather such information within its possession, custody or control. CLC reserves the right to amend its responses as new information is gathered.

*UTC v. CenturyLink*, Docket UT-181051

TO: Washington Military Department (WMD)

CenturyLink's Response to WMD Data Request Nos. 1-3

September 1, 2021

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WMD-1 Identify (by date, method (written or oral), location and participants) all communications between CenturyLink Communications, LLC and Comtech Telecommunications Corporation regarding the interconnection of the Comtech and CenturyLink ESInet systems, including all planning, contracting, and implementation of the interconnection from the initial planning stage to until the December 27, 2018–December 29, 2018 network outage that is the subject of the complaint in this proceeding (the “Outage”).

**RESPONSE:**

CLC objects on the basis that this request is overly broad and unduly burdensome. Without waiving its objections, CLC responds as follows.

Attached as Confidential Attachment WMD-1 (bates numbers CLC-001602 through CLC-003127) are documents responsive to this request. While CLC could not reasonably identify every possible communication between CLC and Comtech concerning the interconnection of the two companies' ESInets, CLC did conduct a thorough, good faith review of the records of several custodians, and has produced responsive documents found during that review.

**Respondent: CenturyLink Legal**

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