

**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-23**

CenturyLink Response to Public Counsel Data Request No. 1

**December 15, 2021**

To: Public Counsel  
Re: Docket UT-181051  
CenturyLink's Responses to Public Counsel DR Nos. 1-6  
April 22, 2021  
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- PC-1 For each of the 15 PSAPs still under CenturyLink's management on December 27, 2018, please list:
- a) the number of 911 calls received by each PSAP for each month in 2016, 2017, and 2018;
  - b) For the month of December for 2016, 2017, and 2018, please provide the number of calls per day for each day from December 25 through December 30.

**RESPONSE:**

CLC objects to this data request as not reasonably calculated to lead to the discovery of admissible evidence. The number of calls received by 15 different PSAPs over 3 years is not probative of the issues framed by the Complaint. CLC further objects on the basis that the request is overly broad and unduly burdensome. The data request seeks a special study as the information requested is not readily available in the form sought. To conduct that special study, CLC and its vendor would need to unarchive, download and analyze millions of Call Detail Records (CDRs), most of which (specifically, all CDRs prior to December 10, 2018) are no longer in CLC's possession and have been archived. It would likely take many weeks or possibly months to unarchive the millions of CDRs and would be resource intensive. Without waiving its objections, CLC responds as follows.

The information sought by Public Counsel is not readily or reasonably available. However, see CLC's response to Data Request PC-6. In October 2020, CLC produced to Commission Staff an hour-by-hour account of attempted 911 calls to those 15 Washington PSAPs still served by CenturyLink as of the date of the event ("CenturyLink PSAPs") in Washington between December 27, 2018 and December 29, 2018. For reasons unknown to CLC, Commission Staff did not disclose or include that information in its complaint or investigation reports, and instead incorrectly suggested that no 911 calls were completed in Washington during those dates. The data provided to Staff shows otherwise.

**Respondents: CenturyLink Legal  
Carl Klein, Manager Public Safety Services**