

**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-24

CenturyLink Supplemental Response to Public Counsel Data Request No. 35

December 15, 2021

CenturyLink Communications, LLC ("CLC"), by and through its counsel hereby objects and responds to the Fourth Set of Data Requests of Public Counsel as follows:

GENERAL OBJECTIONS

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

1. CLC objects to the data request to the extent that it seeks or purports 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 the data request to the extent (i) that the information requested is known to Public Counsel or their 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 Public Counsel or their counsel from sources other than CenturyLink.
4. CLC objects to the data request to the extent that it is overly broad, vague and ambiguous, unduly burdensome, and calling for information that is irrelevant or not proportional to the needs of the case.
5. This response is 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 response as new information is gathered.

PC-35 Please supply call counts for all calls by day for a 90-day period centered on the incident measured at the "Lumen Selective Router", the Intrado ESInet, and the ITT. Supply the same call counts at the same measuring points for the same date range in the prior four years. At the Intrado ESInet and the ITT, supply counts per day by destination PSAP and totals. For the call counts at the Lumen Selective Router, please supply only the total call counts per day.

RESPONSE:

CLC objects to this request on the grounds that it is overly broad, unduly burdensome and requires a special study. CLC further objects on the basis that this request is not reasonably calculated to lead to the discovery of admissible evidence. Without waiver of its objections, CLC responds as follows.

CenturyLink does not possess the Lumen Selective Router information requested. That data is retained only for 45 days.

CLC interprets the "Intrado ESInet" and "ITT" data to be the same. Attached as Attachment PC-35 is an analysis covering December 11, 2018 through January 14, 2019. CLC is able to provide this information because it had the data on hand.

To extract the remaining data requested would be extremely burdensome. Archived data is stored in various buckets cross multiple servers. To perform this special study, CLC (or its contractor) would be required to find and copy all buckets (on all servers that contain 911 data) and move them to a production server. This may amount to thousands of buckets across many servers. Then all the buckets and data need to be thawed to allow the information to be loaded and later analyzed. Doing so would potentially require treatment of millions of records across thousands of buckets and would likely take weeks.

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

SUPPLEMENTAL RESPONSE (September 28, 2021)

Without waiving its objections, CLC responds as follows. Attached as Revised Attachment PC-35 is an analysis covering January 2016 through February 2019 (for the dates sought in this data request). Revised Attachment PC-35 replaces Attachment PC-35 in its entirety.

Revised Attachment PC-35 was created based on CDR data. CDR data is not available for 2014 and 2015; the only data available for those earlier time periods is ALI bid data, but that data does not reveal the number of calls that were placed. Multiple ALI bids could exist for a single call, thus rendering the data useless for purposes of comparing PSAP-specific call volumes year over year.

Respondent: CenturyLink Legal
Carl Klein, Manager Public Safety Services