

**BEFORE THE WASHINGTON  
UTILITIES & TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,

Complainant,

v.

THE CENTRUYLINK COMPANIES - QWEST CORPORATION; CENTURYTEL OF  
WASHINGTON; CENTURYTEL OF INTERISLAND; CENTURYTEL OF  
COWICHE; AND UNITED TELEPHONE COMPANY OF THE NORTHWEST

Respondent.

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DOCKET UT-240029

**DAVID BREVITZ, C.F.A.  
ON BEHALF OF THE  
WASHINGTON STATE OFFICE OF THE ATTORNEY GENERAL  
PUBLIC COUNSEL UNIT**

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**EXHIBIT DB-4**

CenturyLink's Response to Public Counsel's Data Request Nos. 14-  
27(R) and CenturyLink's 1<sup>st</sup> Supplemental Response to Public  
Counsel's Data Request Nos. 21, 27(R) (combined)

**April 3, 2024**

Dockets UT-240029/UT-130477

CenturyLink Companies' Response to Public Counsel Data Request Nos. 14-27

March 12, 2024

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**CenturyLink Companies' Response to Public Counsel Data Request Nos. 14 through 27**

The CenturyLink Companies, by and through their undersigned counsel hereby object and respond to Public Counsel's Data Request Nos 14-27:

**GENERAL OBJECTIONS**

The CenturyLink Companies incorporate the following general objections into each individual data request response below:

1. The CenturyLink Companies object to each 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. The CenturyLink Companies object to any data request or instruction that purports to require more than is required by the applicable rules of the Commission.
3. The CenturyLink Companies object generally to each 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 The CenturyLink Companies.
4. The CenturyLink Companies object to each 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. These responses are provided on the basis of the best information currently available to The CenturyLink Companies after diligent effort to gather such information within its possession, custody or control. The CenturyLink Companies reserve the right to amend these responses as new information is gathered.

**REDACTED****Shaded Information is CONFIDENTIAL Per Protective Order in Docket UT-240029**

PC-14 Please provide copies of all data requests submitted to you by any party to this proceeding and your corresponding responses to those requests.

**RESPONSE:**

CenturyLink will do so.

**Respondent:** CenturyLink Legal

PC-15 Provide documents which show Lumen's, CenturyLink's or any other affiliate's monitoring of competitor pricing, marketing campaigns, facility locations, improvements, products, capacity and innovation plans in or including the State of Washington.

**RESPONSE:**

CenturyLink objects to this data request on the basis that it is overly broad, unduly burdensome and seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. This proceeding considers whether CenturyLink is subject to effective competition in its ILEC service territories. This request seeks information irrelevant to the Commission's determination under RCW 80.36.320. Without waiving its objections, CenturyLink responds as follows.

CenturyLink subscribes to third party services that track and monitor the competitive landscape for *broadband* pricing and offers, but not strictly for *voice* services. These include [REDACTED]. CenturyLink likewise utilizes third party market research/survey tools (including [REDACTED]), which (among other things) prompt customers to respond to questions regarding their CenturyLink user experience and regarding competitor services and websites. The focus of these market research/survey tools is largely on broadband competition, rather than competition for POTS services. It is CenturyLink's experience that Washington customers are largely disinterested in standalone voice services. This is buttressed by the Center for Disease Control's finding that only 2.3% of Washington subscribers use only landline services, whereas 65% of Washington subscribers use wireless only, with another 17.5% using mostly wireless. See Exhibit PJG-5.

**Respondent:** Peter Gose, Director State and Local Government Affairs  
([peter.gose@lumen.com](mailto:peter.gose@lumen.com); 303-324-5678)  
Jason Grant, Customer Researcher, Marketing  
([jason.grant@lumen.com](mailto:jason.grant@lumen.com); 913-634-7800)  
Linda Rubright, Senior Customer Researcher, Marketing  
([linda.rubright@lumen.com](mailto:linda.rubright@lumen.com))

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PC-16 Provide documents which show what steps and actions have been taken by Lumen, CenturyLink or any other affiliate to preserve or enhance competitiveness or profitability in rural areas of the State of Washington served by those affiliates.

**RESPONSE:**

CenturyLink objects to this data request on the basis that it is overly broad, unduly burdensome and seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. This proceeding considers whether CenturyLink is subject to effective competition in its ILEC service territories. This request seeks information irrelevant to the Commission's determination under RCW 80.36.320. Without waiving its objections, CenturyLink responds as follows.

As worded, this request is not limited by time. Focusing on the past few years, CenturyLink is not aware of any action plans or programs specifically designed to "preserve or enhance competitiveness or profitability in rural areas" for voice services. As to *broadband* services, CenturyLink has participated (and is participating) in various subsidized broadband expansion programs including CAF2 and RDOF.

**Respondent:** Peter Gose, Director State and Local Government Affairs  
([peter.gose@lumen.com](mailto:peter.gose@lumen.com); 303-324-5678)  
Jason Grant, Customer Researcher, Marketing  
([jason.grant@lumen.com](mailto:jason.grant@lumen.com); 913-634-7800)  
Linda Rubright, Senior Customer Researcher, Marketing  
([linda.rubright@lumen.com](mailto:linda.rubright@lumen.com))

PC-17 Provide a working Excel spreadsheet version of Exhibit 1 to the Declaration of Peter Gose with all formulas, links, and references intact.

**RESPONSE:**

See Exhibit PJG-2C, attached to the Direct Testimony Peter Gose (Exhibit PJG-1T).

**Respondent:** CenturyLink Legal

- PC-18 Please reference each of the “All Fixed Providers/Copper/Cable/Fiber/Satellite/ Fixed Wireless” tabs in Exhibit 1 to the Declaration of Peter Gose. For each of those tabs contained in Exhibit 1, please explain or provide the following:
- A. Please explain the definition of “location” in the context of the data contained in Exhibit 1, column F of the above tabs.
  - B. Please explain the meaning of the “total locations” in the context of the data contained in Exhibit 1, column F of the above tabs.
  - C. Please explain the source and calculation of the data populating each cell in “total locations” column F of these tabs in Exhibit 1.
  - D. Please explain the definition of “served” in the context of the data contained in Exhibit 1, column G of the above tabs.
  - E. Please explain the meaning of the “total served” heading in the context of the data contained in Exhibit 1, column G of the above tabs/
  - F. Please explain the source and calculation of the data populating each cell in “total served” column G of these tabs in Exhibit 1.
  - G. Provide documentation supporting the data populating each of the provider columns and each of the wire center rows for each of the above tabs.
  - H. For each provider in Row 1 of each of the above tabs, describe the steps taken by Lumen to identify each provider for inclusion in the Exhibit 1 analysis.
  - I. Provide documentation for each provider identified in Row 1 of each of the above tabs which demonstrates what telecommunications services each provider in Row 1 provides *in each wire center* in column D or E (as applicable) of Exhibit 1.

**RESPONSE:**

CenturyLink objects to this data request on the basis that it is overly broad, unduly burdensome, seeks information equally available to Public Counsel in the public domain and requires a special study. Without waiving its objections, CenturyLink responds as follows:

- A. “Location” refers to a broadband serviceable location according to the FCC’s Broadband Data Collection (“BDC”). See [https://help.bdc.fcc.gov/hc/en-us/articles/7412732399003-Fabric-FAQs#:~:text=A%20broadband%20serviceable%20location%20is,or%20group%20quarters%20\(as%20those](https://help.bdc.fcc.gov/hc/en-us/articles/7412732399003-Fabric-FAQs#:~:text=A%20broadband%20serviceable%20location%20is,or%20group%20quarters%20(as%20those)
- B. “Total Location” refers to all of the broadband serviceable locations in the given wire center.
- C. The data is derived from the June 30, 2023 publicly-available BDC data.
- D. “Served” refers to the locations that are or could be served by the identified providers in the wire center. In other words, the carrier has service available at that address, and thus it shows as “served,” regardless of whether the customer subscribes to that that provider’s or another provider’s service.

- E. “Total served” refers to the number of locations that are or could be served by the identified providers in the wire enter.
- F. See CenturyLink’s response to subpart C.
- G. See CenturyLink’s response to Staff Data Request 34.
- H. See CenturyLink’s response to Staff Data Request 34.
- I. See CenturyLink’s response to Staff Data Request 34. Information regarding the individual providers can be found on each provider’s website. CenturyLink has not aggregated such documentation.

**Respondent:** Peter Gose, Director State and Local Government Affairs  
([peter.gose@lumen.com](mailto:peter.gose@lumen.com); 303-324-5678)  
Jacob Barlow, Government Operations Manager  
([Jacob.barlow@lumen.com](mailto:Jacob.barlow@lumen.com); 303-707-7004)



PC-19 Provide documents which show the current status of construction in each Rural Digital Opportunity Fund (RDOF) area awarded to Lumen or its affiliates in the State of Washington by the Federal Communications Commission, identifying each Lumen affiliate.

**RESPONSE:**

CenturyLink objects to this data request on the basis that it is overly broad, unduly burdensome and seeks information that is not relevant nor reasonably calculated to lead to the discovery of admissible evidence. Without waiving its objections, CenturyLink responds as follows:

Presently, CenturyLink locations won in Washington are in analysis and planning stages and will soon move to engineering analysis. These activities must conclude prior to the commencement of construction.

**Respondent:** Peter Gose, Director State and Local Government Affairs  
([peter.gose@lumen.com](mailto:peter.gose@lumen.com); 303-324-5678)

PC-20 Please reference each of the “All Fixed Providers/Copper/Cable/Fiber/Satellite/ Fixed Wireless” tabs in Exhibit 1 to the Declaration of Peter Gose. Please confirm no data for Lumen or any of its affiliates is included on any of these tabs. If this is incorrect, please show where data for Lumen or any of its affiliates is included.

**RESPONSE:**

Confirmed. See Exhibit PJG-1T, page 34.

**Respondent:** Peter Gose, Director State and Local Government Affairs  
([peter.gose@lumen.com](mailto:peter.gose@lumen.com); 303-324-5678)

- PC-21 Please provide responses to the following in native format with all formulas intact.
- A. Please provide customer subscription data for the State of Washington from the last Form 477 filing (Local Telephone Competition and Broadband Reporting data as of June 30, 2022) by CenturyLink and any affiliates, for each fixed services section of the Form, in Excel spreadsheet file format. This includes:
- i. Fixed Broadband Subscription broken down by each unique combination of Washington census tract and service characteristic, technology, and bandwidth as those terms are defined and used in Form 477 reporting and instructions,
  - ii. Fixed Voice Subscription (Tract Data) for both local exchange carrier operations and interconnected VoIP services, including the number of lines provided under a consumer service plan as that term is defined and used in Form 477 reporting and instructions,
  - iii. Local Exchange Telephone Subscriptions (Washington State Data) for both ILEC and CLEC affiliates further broken down by:
    1. lines provided to unaffiliated providers
      - a. Wholesale and UNE-L separately
    2. lines provided to End Users
      - a. by services sold (Voice with Internet and Voice without Internet separately)
      - b. Product type/Consumer
      - c. Product type/Business and Government
      - d. By last mile medium (technology in use at the termination at the end-user's premise).
  - iv. Interconnected VoIP Subscription (Washington State Data), broken down by Over-the-top subscriptions and all other subscriptions, with all other subscriptions further broken down by Voice with Internet and Voice without Internet, and by last mile medium (the technology that terminates at the end-user's premises).
- B. Please provide the information described in subpart A., above, for Form 477 reporting to the FCC for the period as of December 31, 2017, in Excel spreadsheet file format.
- C. Please provide the information described in subpart A., above, for Form 477 reporting to the FCC for the period as of December 31, 2012, in Excel spreadsheet file format.

**RESPONSE:**

CenturyLink objects to this data request on the basis that it requires a special study. CenturyLink further objects on the basis that the request seeks information that is not reasonably calculated to lead to the discovery of admissible evidence. This proceeding examines whether CenturyLink is subject to effective competition for voice services in its ILEC service territories. This request, in part, seeks information

concerning CenturyLink broadband services. Without waiving its objections, CenturyLink responds as follows.

- A. See Attachment Public Counsel 21(C).
- B. See Attachment Public Counsel 21(C).
- C. CenturyLink does not have the requested information for 2012.

**Respondent:** Peter Gose, Director State and Local Government Affairs  
([peter.gose@lumen.com](mailto:peter.gose@lumen.com); 303-324-5678)  
John Hayes, Government Operations Manager  
([john.hayes1@lumen.com](mailto:john.hayes1@lumen.com); 318-388-9988)

PC-22 Please provide the information in PC-21 A., above, broken down by wire center, in Excel spreadsheet file format, using the same or similar methodology used by CenturyLink to divide census tract data among CenturyLink wire centers where required.

**RESPONSE:**

CenturyLink objects to this data request on the basis that it is overly broad, unduly burdensome and requires a special study. CenturyLink further objects on the basis that the request seeks information that is not reasonably calculated to lead to the discovery of admissible evidence. This proceeding examines whether CenturyLink is subject to effective competition for voice services in its ILEC service territories. This request, in part, seeks information concerning CenturyLink broadband services. Without waiving its objections, CenturyLink responds as follows.

See Attachment Public Counsel 22(C). CenturyLink does not have the information requested for 2012 and 2017.

**Respondent:** Peter Gose, Director State and Local Government Affairs  
([peter.gose@lumen.com](mailto:peter.gose@lumen.com); 303-324-5678)  
John Hayes, Government Operations Manager  
([john.hayes1@lumen.com](mailto:john.hayes1@lumen.com); 318-388-9988)  
Jacob Barlow, Government Operations Manager  
([Jacob.barlow@lumen.com](mailto:Jacob.barlow@lumen.com); 303-707-7004)

- PC-23 A. Please reference each of the “Copper” and “Fiber” tabs in Exhibit 1 to the Declaration of Peter Gose. Please provide the number of subscribers served by Lumen or its affiliates, as of June 30, 2023, in each wire center for each technology tab, in Excel spreadsheet file format.
- B. Please provide the subscriber data for PC-23 A., above, as of:
- i. December 31, 2017, in Excel spreadsheet file format;
  - ii. December 31, 2012, in Excel spreadsheet file format.

**RESPONSE:**

See Attachment Public Counsel 23(C) for 2023 data. CenturyLink does not have the information requested for 2012 and 2017.

**Respondent:** Peter Gose, Director State and Local Government Affairs  
([peter.gose@lumen.com](mailto:peter.gose@lumen.com); 303-324-5678)  
John Hayes, Government Operations Manager  
([john.hayes1@lumen.com](mailto:john.hayes1@lumen.com); 318-388-9988)

- PC-24 Please refer to the Wall Street Journal article “Heard on the Street: Lead Cables will be a Dead Weight for Telecom Carriers”, by Dan Gallagher, dated July 18, 2023, included as Attachment A to this set of data requests
- A. For each CenturyLink company (Qwest Corporation, CenturyTel of Washington, CenturyTel of InterIsland, CenturyTel of Cowiche, and United Telephone Company of the Northwest), please provide documents which show each wire center for each ILEC with lead-sheathed copper cables which have not been removed, and related cable feet of lead-sheathed cable that has not been removed.
    - i. Please provide documents which show any programs CenturyLink and its affiliates have to remove or otherwise mitigate potential health risks and environmental hazards from lead-sheathed copper cable in the State of Washington.
  - B. Please provide documents which show plans of CenturyLink and its affiliates to remove lead-sheathed copper cables or otherwise mitigate possible health risks and environmental hazards from these cables:
  - C. Please provide documents which show CenturyLink’s assessment of health risks and environmental hazards from lead-sheathed copper cables in the State of Washington.
    - i. Please provide documents which show CenturyLink’s assessment of health risks and environmental hazards from lead-sheathed copper cables in other CenturyLink states.
  - D. Please provide documents which show estimated costs of these plans of CenturyLink and its affiliates to remove lead-sheathed copper cables or otherwise mitigate possible health risks and environmental hazards from these cables.
    - i. Does CenturyLink have such a plan for the State of Washington?
      1. If not, why not.
      2. If so, please provide a copy of the most current plan.
  - E. Please describe if CenturyLink and its affiliates would consider themselves responsible for costs of mitigating possible health risks and environmental hazards from lead-sheathed copper cables if it’s Petition for Competitive Classification were granted by the Commission.
    - i. Please identify which provision of its proposed reclassification request continues CenturyLink’s responsibility and liability for mitigating possible health risks and environmental hazards from these cables.
  - F. Please identify and describe efforts CenturyLink and its affiliates have undertaken in any other states to mitigate possible health risks and environmental hazards from its lead-sheathed copper cables.
    - i. Describe the current status of each of these efforts.

**RESPONSE:**

CenturyLink objects to this data request on the basis that it is overly broad, unduly burdensome and seeks information that is not relevant nor reasonably

calculated to lead to the discovery of admissible evidence. RCW 80.36.320 evaluates whether the company is subject to effective competition and whether the company has a substantial captive customer base in the voice market. This data request seeks to explore areas wholly unrelated to CenturyLink's petition.

**Respondent:** CenturyLink Legal



- PC-25 Please provide documents which show all the reasons or codes a customer service representative can use when a subscriber to voice service provided by any CenturyLink ILEC in Washington can use when a subscriber calls to terminate voice service from CenturyLink.
- A. Please describe internal reports produced by CenturyLink customer service representatives that show reasons subscribers terminates voice service from CenturyLink.
  - B. Please provide copies of these internal reports documents which show service termination activity and the reasons given by the subscriber for terminating service, for the period January 1, 2020 to date.
  - C. Please provide documents which show reporting of subscriber win-backs and subscriber losses for the period of January 1, 2020.

**RESPONSE:**

CenturyLink objects to this data request on the basis that it is overly broad, unduly burdensome and seeks information that is not relevant nor reasonably calculated to lead to the discovery of admissible evidence. Without waiving its objections, CenturyLink responds as follows.

- A. While CenturyLink representatives inquire of customers as to why they are disconnecting services, CenturyLink does not generate internal reports on a regular cadence.
- B. See response to subpart A. However, see Attachment Public Counsel 25(C), which summarizes (January 2022-present) Washington voice service disconnects by reason code.
- C. CenturyLink is searching for the requested information, and will supplement its response.

**Respondent:** CenturyLink Legal  
Brandon Sandoval, Sr. Mgr. Business Intelligence  
(brandon.sandoval@lumen.com; 720-567-6380)

- PC-26 Please provide in native format as applicable.
- A. Please provide documents which show market research conducted within the past three years by or for CenturyLink or its affiliates to gather information from Washington customers about their telecommunications needs:
    - i. Strictly for voice services,
    - ii. For broadband internet access services.
  - B. Please provide documents which show market research conducted within the past three years by or for CenturyLink or its affiliates to gather information from its ILEC customers in other states about their telecommunications needs:
    - i. Strictly for voice services,
    - ii. For broadband internet access services.
  - C. Please provide documents which show market research conducted within the past three years by or for CenturyLink or its affiliates to gather information from its ILEC customers in Washington or any other states to determine the extent to which landline customers view wireless service as a comparable and substitutable service for landline service.
  - D. Identify and describe any programs CenturyLink may have to “win back” subscribers that disconnected local exchange service in Washington and other states served by CenturyLink ILECs.
    - i. Please provide documents which further show and describe these programs, including a description of the geographic areas where CenturyLink has implemented these programs in the past three years.
  - E. Please provide documents which show the results of any market surveys conducted by or for CenturyLink or its affiliates regarding customer satisfaction with the company’s voice services product, in the past five years:
    - i. In the State of Washington,
    - ii. In other CenturyLink states with ILEC operations.
  - F. Please provide documents which show the results of any market surveys conducted by or for CenturyLink or its affiliates regarding customer telecommunications needs, wants and preferences, in the past five years:
    - i. In the State of Washington,
    - ii. In other CenturyLink states with ILEC operations.
  - G. Please provide documents which show the results of any market research conducted by or for CenturyLink or its affiliates regarding why CenturyLink customers may have switched telecommunications providers, in the past five years:
    - i. In the State of Washington,
    - ii. In other CenturyLink states with ILEC operations.

**RESPONSE:**

CenturyLink objects to this data request on the basis that it is overly broad, unduly burdensome and seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. This proceeding considers whether CenturyLink is subject to effective competition in its ILEC service territories in Washington, yet this request explicitly seeks information regarding other states. Without waiving its objections, CenturyLink responds as follows.

- A. CenturyLink has not conducted market research for voice services in the past decade. It is CenturyLink's experience that Washington customers are largely disinterested in standalone voice services. This is buttressed by the Center for Disease Control's finding that only 2.3% of Washington subscribers use only landline services, whereas 65% of Washington subscribers use wireless only, with another 17.5% using mostly wireless. See Exhibit PJG-5. See also CenturyLink's response to Public Data Request 15.
- B. CenturyLink's market research regarding other states is not relevant to this proceeding.
- C. Customer behavior reveals that wireless service is a potent competitor and substitute for CenturyLink voice service. See the CDC's data above and in Exhibit PJG-15. See also Exhibit PJG-1T, Table 1, which demonstrates that wireless service is a comparable and substitutable service for landline service.
- D. CenturyLink sends an email to some disconnected customers within 7 days. See Attachment Public Counsel 26d.
- E. See CenturyLink's response to Public Counsel Data Request No. 15. CenturyLink does not have a systematic way to search or pull reports in the manner requested for the past 5 years.
- F. See CenturyLink's response to subpart F, and CenturyLink's response to Public Counsel Data Request 25.

**Respondent:** Peter Gose, Director State and Local Government Affairs  
([peter.gose@lumen.com](mailto:peter.gose@lumen.com); 303-324-5678)  
Jason Grant, Customer Researcher, Marketing  
([jason.grant@lumen.com](mailto:jason.grant@lumen.com); 913-634-7800)  
Linda Rubright, Senior Customer Researcher, Marketing  
([linda.rubright@lumen.com](mailto:linda.rubright@lumen.com))

- PC-27 Please refer to the “Access Line Count Data (C)” tab of Exhibit 1 to the Gose Declaration.
- A. For the column C, headed “LEC\_TYPE”, cells C2 to C17, for each cell identify by name each CenturyLink affiliate whose subscribers are included in the subscriber totals in column F.
  - B. For the column C, headed “LEC\_TYPE”, cells C20 to C27, for each cell identify by name each CenturyLink affiliate whose subscribers are included in the subscriber totals in column F.
  - C. For the column C, headed “LEC\_TYPE”, cells C30 to C37, for each cell identify by name each CenturyLink affiliate whose subscribers are included in the subscriber totals in column F.

**RESPONSE:**

- A. “CLEC CLC” refers to CenturyLink Communications, LLC

“CLEC LVL3” refers cumulatively to the legacy Level 3 affiliates, including Level 3 Communications, LLC, Level 3 Telecom of Washington, LLC, Broadwing Comm, LLC, Global Crossing and Wiltel.

“ILEC CTL” refers cumulatively to the CenturyLink ILECs that are the petitioners in this case.

- B. See subpart A.
- C. See subpart A.

**Respondent:** Peter Gose, Director State and Local Government Affairs  
([peter.gose@lumen.com](mailto:peter.gose@lumen.com); 303-324-5678)

**CenturyLink's 1<sup>st</sup> Supplemental Response to Public  
Counsel's Data Request Nos. 21, 27(R)**

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CenturyLink Companies' Response to Public Counsel Data Request Nos. 14-27

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**CenturyLink Companies' First Supplemental Response to  
Public Counsel Data Request Nos. 21 and 27**

The CenturyLink Companies, by and through their undersigned counsel hereby object and respond to Public Counsel's Data Request Nos 14-27:

**GENERAL OBJECTIONS**

The CenturyLink Companies incorporate the following general objections into each individual data request response below:

1. The CenturyLink Companies object to each 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. The CenturyLink Companies object to any data request or instruction that purports to require more than is required by the applicable rules of the Commission.

3. The CenturyLink Companies object generally to each 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 The CenturyLink Companies.

4. The CenturyLink Companies object to each 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. These responses are provided on the basis of the best information currently available to The CenturyLink Companies after diligent effort to gather such information within its possession, custody or control. The CenturyLink Companies reserve the right to amend these responses as new information is gathered.

**REDACTED**

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CenturyLink Companies' Response to Public Counsel Data Request Nos. 14-27

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- PC-21 Please provide responses to the following in native format with all formulas intact.
- A. Please provide customer subscription data for the State of Washington from the last Form 477 filing (Local Telephone Competition and Broadband Reporting data as of June 30, 2022) by CenturyLink and any affiliates, for each fixed services section of the Form, in Excel spreadsheet file format. This includes:
  - B. Fixed Broadband Subscription broken down by each unique combination of Washington census tract and service characteristic, technology, and bandwidth as those terms are defined and used in Form 477 reporting and instructions,
  - C. Fixed Voice Subscription (Tract Data) for both local exchange carrier operations and interconnected VoIP services, including the number of lines provided under a consumer service plan as that term is defined and used in Form 477 reporting and instructions,
  - D. Local Exchange Telephone Subscriptions (Washington State Data) for both ILEC and CLEC affiliates further broken down by:
    - E. lines provided to unaffiliated providers
    - F. Wholesale and UNE-L separately
    - G. lines provided to End Users
    - H. by services sold (Voice with Internet and Voice without Internet separately)
    - I. Product type/Consumer
    - J. Product type/Business and Government
    - K. By last mile medium (technology in use at the termination at the end-user's premise).
    - L. Interconnected VoIP Subscription (Washington State Data), broken down by Over-the-top subscriptions and all other subscriptions, with all other subscriptions further broken down by Voice with Internet and Voice without Internet, and by last mile medium (the technology that terminates at the end-user's premises).
  - M. Please provide the information described in subpart A., above, for Form 477 reporting to the FCC for the period as of December 31, 2017, in Excel spreadsheet file format.
  - N. Please provide the information described in subpart A., above, for Form 477 reporting to the FCC for the period as of December 31, 2012, in Excel spreadsheet file format.

**RESPONSE:**

CenturyLink objects to this data request on the basis that it requires a special study. CenturyLink further objects on the basis that the request seeks information that is not reasonably calculated to lead to the discovery of admissible evidence. This proceeding examines whether CenturyLink is subject to effective competition for voice services in its

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ILEC service territories. This request, in part, seeks information concerning CenturyLink broadband services. Without waiving its objections, CenturyLink responds as follows.

- A. See Attachment Public Counsel 21(C).
- B. See Attachment Public Counsel 21(C).
- C. CenturyLink does not have the requested information for 2012.

**Respondent:** Peter Gose, Director State and Local Government Affairs  
([peter.gose@lumen.com](mailto:peter.gose@lumen.com); 303-324-5678)  
John Hayes, Government Operations Manager  
([john.hayes1@lumen.com](mailto:john.hayes1@lumen.com); 318-388-9988)

**SUPPLEMENTAL RESPONSE (April 1, 2024)**

On a statewide basis, as of June 30, 2022, CenturyLink ILECs had a total of [REDACTED]. CenturyLink does not have that information for 2012 or 2017.

**Respondent:** John Hayes, Government Operations Manager  
([john.hayes1@lumen.com](mailto:john.hayes1@lumen.com); 318-388-9988)

**REDACTED**

**Shaded Information is CONFIDENTIAL Per Protective Order in Docket UT-240029**



Dockets UT-240029/UT-130477

CenturyLink Companies' Response to Public Counsel Data Request Nos. 14-27

March 12, 2024

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- PC-27 Please refer to the "Access Line Count Data (C)" tab of Exhibit 1 to the Gose Declaration.
- A. For the column C, headed "LEC\_TYPE", cells C2 to C17, for each cell identify by name each CenturyLink affiliate whose subscribers are included in the subscriber totals in column F.
- B. For the column C, headed "LEC\_TYPE", cells C20 to C27, for each cell identify by name each CenturyLink affiliate whose subscribers are included in the subscriber totals in column F.
- C. For the column C, headed "LEC\_TYPE", cells C30 to C37, for each cell identify by name each CenturyLink affiliate whose subscribers are included in the subscriber totals in column F.

**RESPONSE:**

- A. "CLEC CLC" refers to CenturyLink Communications, LLC

"CLEC LVL3" refers cumulatively to the legacy Level 3 affiliates, including Level 3 Communications, LLC, Level 3 Telecom of Washington, LLC, Broadwing Comm, LLC, Global Crossing and Wiltel.

"ILEC CTL" refers cumulatively to the CenturyLink ILECs that are the petitioners in this case.

- B. See subpart A.

- C. See subpart A.

**Respondent:** Peter Gose, Director State and Local Government Affairs  
([peter.gose@lumen.com](mailto:peter.gose@lumen.com); 303-324-5678)

**SUPPLEMENTAL RESPONSE (April 1, 2024)**

During a meet and confer discussion, Public Counsel asked CenturyLink to supplement this response with the number of Q Fiber LLC VoIP customers in Washington. Q Fiber currently has [REDACTED]

**Respondent:** John Hayes, Government Operations Manager, Public Policy  
([john.hayes1@lumen.com](mailto:john.hayes1@lumen.com); 318-388-9988)

**REDACTED****Shaded Information is CONFIDENTIAL Per Protective Order in Docket UT-240029**