

February 1, 2024

Ms. Kathy Hunter
Acting Executive Director and Secretary
Washington Utilities & Transportation Commission
621 Woodland Square Loop SE
Lacey, Washington 98503

**Re: Docket UT-132234, Order 03, Compliance Filing
CenturyLink's San Juan Islands Submarine Cable Inspection Plan**

Dear Ms. Hunter:

In compliance with the terms of the Revised Settlement Agreement between CenturyLink, Staff and Public Counsel, approved by the Commission in its Order 03 in the above-referenced docket, this letter and its attachments serve as CenturyLink's annual report of the results of all inspections and maintenance performed during the preceding calendar year for both underwater fiber cable and the microwave systems pursuant to the San Juan Islands Annual Measurement, Maintenance and Inspection Technical Agreement. At paragraph 16, Order 03 provides:

Specifically, by virtue of a series of mandatory inspection and reporting obligations, CenturyLink is required to submit annual inspection plans for the San Juan Submarine Facilities to the Commission, by November 30 of each year, reporting with specificity on its exact plans for conducting inspections of the submarine fiber optic system for the subsequent calendar year. The inspection plans will contain the locations of the facilities to be inspected and the precise frequency and manner in which the inspections will be conducted. Subsequent to each year's inspections, the Company agrees to report by March 31 of the following year, the results of all inspections and maintenance performed during the preceding calendar year for both underwater fiber cable and the microwave systems. (footnotes omitted)

This report includes four attachments as follows:

Inspection Plan: In compliance with the terms of Paragraph F.1 of the Revised Settlement Agreement between CenturyLink, Staff, and Public Counsel, approved by the

Commission in its Order 03, the Inspection Plan outlines the location of the facility to be inspected and the frequency and manner in which the inspection will be conducted.

Attachment 1 provides the required information related to inspection and maintenance functions performed on the company's submarine fiber cable facilities in 2022. The information provided in Attachment 1 is the result of CenturyLink's 2022 submarine cable inspection; the plan which is also included in this filing.

Attachment 2 contains the reports of the inspections of microwave radio towers at the Bellingham central office, the Friday Harbor central office, the Mt. Constitution North radio site, and the Mt. Constitution South radio site. CenturyLink conducted these inspections in accordance with its current Antenna and Tower Routine Inspection, which is outlined in Appendix A to the Settlement Agreement. CenturyLink did not change its Antenna and Tower Routine Inspection procedure.

Attachment 3 contains screen shots of tests of the radio signals between Friday Harbor and Mt. Constitution, Mt. Constitution and Friday Harbor and Mt. Constitution and Bellingham. Note that we are providing the most current tests available, which were performed earlier this year.

The San Juan microwave systems continue to provide redundant capacity between the island customers and the host switch in Friday Harbor and between Friday Harbor and Bellingham, Washington. The systems have sufficient capacity to maintain CenturyLink's intrastate voice and critical services traffic on a diverse route between the islands and the mainland at normal call volumes.

If you have any questions regarding the enclosed, please don't hesitate to call me.

Sincerely,



Peter J. Gose
Regulatory Affairs Director

Attachments
cc: Service List
