**BEFORE THE WASHINGTON**

**UTILITIES AND TRANSPORTATION COMMISSION**

**WUTC v. Qwest Corp. d/b/a CenturyLink QC**

**Docket UT-140597**

**RESPONSE OF PUBLIC COUNSEL TO CENTURYLINK DATA REQUEST NO. 13**

Request No: 13

Directed to: Public Counsel

Date Received: August 10, 2015

Date Produced: August 24, 2015

Prepared by: Lisa W. Gafken, Assistant Attorney General

**CENTURYLINK Data Request No. 13 to public counsel:**

Please provide citations to any Commission cases of which Public Counsel is aware in Washington where penalties were assessed on a per-call basis.

**RESPONSE:**

Objection. This data request seeks information protected by the work product doctrine. Additionally, this data request seeks information that is outside the scope of discovery.