

**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.