

**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. 19

Request No: 19
Directed to: Public Counsel
Date Received: August 31, 2015
Date Produced: September 21, 2015
Prepared by: David C. Bergmann

CENTURYLINK DATA REQUEST NO. 19 TO PUBLIC COUNSEL:

Please admit that Mr. Bergmann is not and will not testify as an expert regarding the operation of telecommunications networks in general, and E911 or NG911 networks in particular. If you do not admit this, please provide all information supporting Mr. Bergmann's expertise, including academic qualifications, and any work experience installing, designing, engineering, operating or repairing such networks.

RESPONSE:

Mr. Bergmann is not testifying as an expert regarding the technical aspects of the operation of E911 and NG911 networks. For those technical aspects, he relies on the opinions of other experts (such as those with Commission Staff and the FCC).