

**BEFORE THE WASHINGTON  
UTILITIES & TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

Complainant,

v.

THE CENTURYLINK 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

RESPONSE TESTIMONY OF ~~STEPHANIE K. CHASE~~-JEAN MARIE DREYER  
ON BEHALF OF  
WASHINGTON STATE OFFICE OF THE ATTORNEY ~~GENRAL~~GENERAL  
PUBLIC COUNSEL UNIT

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Exhibit JMD-1T~~r~~ ~~SKC-1T~~

~~April 3, 2024~~

Revised May 13, 2024

**RESPONSE TESTIMONY OF JEAN MARIE DREYER~~STEPHANIE K. CHASE~~**

**EXHIBIT ~~SKC-1T~~JMD-1TR**

**DOCKET UT-240029**

**EXHIBITS LIST**

- Exhibit SKC-2    Excel spreadsheets with AGO Consumer Resource Center complaints
- Exhibit SKC-3    Staff Response to Public Counsel’s DRs 3–6
- Exhibit SKC-4    Excel spreadsheet tabulating the numbers of complaints from Exhibit SKC-2.
- Exhibit SKC-5    Excel spreadsheet including a consumer complaint about CenturyLink received by the AGO’s Consumer Resource Center from January 2024.

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1 **Q. Please state your name and business address.**

2 A. My name is ~~Stephanie K. Chase~~ Jean Marie Dreyer and my business address is 800  
3 Fifth Avenue, Suite 2000, Seattle, Washington 98104.

4 **Q. By whom are you employed and in what capacity?**

5 A. I am a Regulatory Analyst with the Public Counsel Unit of the Washington State  
6 Attorney General's Office (Public Counsel). Public Counsel is a statutory party to  
7 proceedings before the Washington Utilities and Transportation Commission (UTC or  
8 the Commission) under RCW 80.01.100, RCW 80.04.510, and RCW 81.04.500.

9 **Q. On whose behalf are you testifying?**

10 A. I am testifying on behalf of the Public Counsel Unit.

11 **Q. Please describe your professional qualifications.**

12 A. I have a Master of Public Administration degree from the Evans School of Public  
13 Policy at the University of Washington. I also have a B.A. in Classics from Whitman  
14 College in Walla Walla, Washington.

15 Prior to joining Public Counsel, I worked as a senior health policy analyst at  
16 the Washington State Health Care Authority (HCA), based in Olympia, Washington.

17 As a senior health policy analyst, I worked on a variety of state health care policy  
18 matters including accountable communities of health (ACHs), alternative payment  
19 methodologies, primary care initiatives, and health care cost transparency issues.

20 I joined Public Counsel in April 2024, and am currently working on a variety  
21 of utility and transportation matters, including the Avista Corporation Electric and  
22 Natural Gas general rate case (Dockets UE-240006 and UG-240007), the 2022 Avista  
23 general rate case (Dockets UE-220053, UG-22054 and UE-210854), Avista's 2023

1 Energy Recovery Mechanism (ERM) Annual Review filing (Docket UE-240276), the  
2 Puget Sound Energy 2024 general rate case (Dockets UE-240004 and UG-240005),  
3 and CenturyLink’s petition for competitive classification filing (Docket UT-240029)  
4 as well as several smaller water rate and company complaint cases.

5 I participate in a number of advisory groups on behalf of Public Counsel. I  
6 represent Public Counsel on Avista’s Electric and Gas Technical Advisory  
7 Committees (TACs), Energy Assistance Advisory Group (EAAG), Equity Advisory  
8 Group (EAG), Energy Efficiency Advisory Group (EEAG), Clean Energy  
9 Implementation Plan Public Participation Meetings, and Puget Sound Energy’s  
10 Conservation Resource Advisory Group (CRAG).

11 Additionally, I have reviewed online training materials from the National  
12 Association of State Utility Consumer Advocates on several topics, including revenue  
13 requirements, rate setting, and O&M expense analysis. I will complete the National  
14 Association of Regulatory Utility Commissioners Rate School this month, May 2024.  
15 I have a J.D. from the University of Wisconsin Law School and a Master of Public  
16 Affairs degree from the La Follette School of Public Affairs at the University of  
17 Wisconsin Madison, with a concentration in energy and environmental policy. I also  
18 have a B.S. in Political Science from South Dakota State University in Brookings,  
19 South Dakota.

20 Prior to joining Public Counsel, I worked as an associate attorney at the  
21 Environmental Law & Policy Center (ELPC) in their Madison, Wisconsin office. As  
22 an associate attorney, I worked on a variety of legal and policy matters related to  
23 energy and environmental issues in Wisconsin, South Dakota, and North Dakota.

1 ~~Since joining Public Counsel in January 2020, I have worked on a variety of utility~~  
2 ~~and transportation matters, including the 2020 Puget Sound Energy (PSE) water heater~~  
3 ~~rental service sale case (Docket UG-200112), the Cascade Natural Gas general rate~~  
4 ~~ease (Docket UG-200568), PSE's Power Cost Only Rate Case (Docket UE-200980),~~  
5 ~~the CenturyLink 911 outage complaint case (Docket UT-181051), the Super Friends~~  
6 ~~Moving Company complaint case (Docket TV-190835), the Clutter, Inc. complaint~~  
7 ~~case (Docket TV-200432), the Washington Water Service Corporation general rate~~  
8 ~~eases (Docket UW-210560 and UW-230236), the 2022 PSE general rate case (Dockets~~  
9 ~~UE-22066 and UG-220067), PacifiCorp's Clean Energy Implementation Plan (UE-~~  
10 ~~210829 and UE-220376), and several smaller water rate cases and transportation~~  
11 ~~company complaint cases.~~

12 ~~I also have worked on several rulemakings related to the Clean Energy~~  
13 ~~Transformation Act (Dockets UE-190698, UE-190837, UE-191023, and UE-210183)~~  
14 ~~and the advanced metering infrastructure rulemaking (Docket U-180525). I am also~~  
15 ~~working on the household goods movers docket revising Tariff 15-C (Dockets~~  
16 ~~TV-210812 and TV-210535 (Consolidated)) and the solid waste rulemaking (TG-~~  
17 ~~220140).~~

18 ~~I participate in a number of advisory groups on behalf of Public Counsel. I~~  
19 ~~represent Public Counsel on PSE's Integrated Resource Plan (IRP) technical advisory~~  
20 ~~group, and PacifiCorp's Demand Side Management advisory group, IRP group,~~  
21 ~~low-income advisory group, and equity advisory group. I also represent Public~~  
22 ~~Counsel on the Washington Utilities and Transportation Commission's~~  
23 ~~(Commission's) electric vehicle and transportation electrification stakeholder group.~~

1 ~~Additionally, I completed the Public Utilities Reports Principles of Public Utilities~~  
2 ~~Operations and Management Guide Course in May 2020, the Michigan State~~  
3 ~~University Institute for Public Utilities Ratemaking Training in September 2020, and~~  
4 ~~the National Association of Regulatory Utility Commissioners Rate School in May~~  
5 ~~2022.~~

6 **Q. Please describe the purpose of your testimony.**

7 A. I am testifying in this proceeding to describe demographic information related to  
8 telephone usage and present a summary and specific examples of customer complaints  
9 against the CenturyLink Companies-Qwest Corporation, CenturyTel of Washington,  
10 CenturyTel of InterIsland, CenturyTel of Cowiche, and United Telephone Company of  
11 the Northwest (collectively, CenturyLink or Company) filed with the Washington  
12 State Office of the Attorney General. I am also presenting information received from  
13 the UTC’s Consumer Protection Division (Staff) about complaints against  
14 CenturyLink. Customer experiences are relevant to CenturyLink’s petition for  
15 competitive classification because of the UTC’s power and duty to regulate in the  
16 public interest.<sup>1</sup> The Commission has noted its “vital role in protecting consumers,  
17 including ensuring public safety.”<sup>2</sup> In addition, “[a]ll regulated telecommunications  
18 companies, including those that are competitively classified, remain subject to  
19 statutory and Commission rule requirements governing retail service quality, and the  
20 Commission does not relinquish its authority to ensure that all regulated companies

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<sup>1</sup> RCW 80.01.040.

<sup>2</sup> *In re CenturyLink Companies AFOR Petition*, Docket UT-130477, Order 04 ¶ 55 (Jan. 09, 2014) (hereinafter *AFOR Docket*).

1 provide good service quality to their customers.”<sup>3</sup> As the Commission is considering a  
2 change to the form of regulation under which CenturyLink operates, it is appropriate  
3 to consider how consumers have been impacted under their current regulatory scheme  
4 and may be impacted under any proposed changes.

5 **Q. Are you sponsoring any exhibits?**

6 A. Yes. I am sponsoring the following exhibits:

- 7 • Exhibit SKC-2, an Excel spreadsheet listing consumer complaints about  
8 CenturyLink received by the AGO’s Consumer Resource Center from 2018-  
9 2023;
- 10 • Exhibit SKC-3, Data Request response from Staff to Public Counsel Data  
11 Requests 3-6;
- 12 • Exhibit SKC-4, an Excel spreadsheet tabulating the numbers of complaints  
13 from Exhibit SKC-2.
- 14 • Exhibit SKC-5, an Excel spreadsheet including a consumer complaint about  
15 CenturyLink received by the AGO’s Consumer Resource Center from January  
16 2024.

17 **Q. How is CenturyLink currently regulated?**

18 A. CenturyLink is currently operating under an Alternative Form of Regulation (AFOR)  
19 order approved by the UTC in Docket UT-130477 in 2014.<sup>4</sup> Prior to the 2014 AFOR,

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<sup>3</sup> *Id.*

<sup>4</sup> *AFOR Docket.* The original AFOR was set to expire on its seventh anniversary, but the UTC extended the operation of the AFOR due to the COVID-19 pandemic in 2020 in Order 07 on June 18, 2020. There were subsequent extensions in Order 08 (June 18, 2021), Order 09 (June 13, 2022), and Order 10 (July 27, 2023).

1 CenturyLink operated under an earlier AFOR authorized in Docket UT-061625 in  
2 2007.<sup>5</sup>

3 **Q. What change does CenturyLink seek to their form of regulation?**

4 A. In their petition filed with the UTC on January 8, 2024, CenturyLink seeks to classify  
5 each of the Company’s incumbent local exchange carriers (ILEC) as competitively  
6 classified companies under the standards of RCW 80.36.320 and WAC 480-121-061.

7 **Q. What is known about telephone usage in Washington and in the U.S. more**  
8 **broadly?**

9 A. As CenturyLink notes in their Petition, mobile wireless services generally “dominate  
10 the voice telephony market.”<sup>6</sup> The Centers for Disease Control and Prevention’s  
11 (CDC) National Center for Health Statistics estimated that in 2020, approximately 65  
12 percent of Washingtonians used wireless only services, 18.7 percent mostly used  
13 wireless, 9.1 percent were dual users of wireless and landlines, 4.6 percent mostly used  
14 landlines, and 3.2 percent only used landlines.<sup>7</sup> The National Center for Health  
15 Statistics also found that around 53 percent of Americans older than 65 have landline  
16 service and 29 percent of Americans between ages 45 and 64 have landlines.<sup>8</sup> Many

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<sup>5</sup> *In re Quest Corp. Alternative Form Regulation*, Docket UT-061625, Order 06 (July 24, 2007).

<sup>6</sup> CenturyLink’s Pet. for Competitive Classification, ¶ 14 (filed Jan. 8, 2024). However, as described in the Response Testimony of David Brevitz, Exh. DB-1CT at 14-16, “universal service” has evolved to be broadband internet access service, not voice telephony.

<sup>7</sup> U.S. Dept. of Health and Hum. Serv., Ctr. for Disease Control and Prevention, *National Health Interview Survey Early Release Program*, NAT’L CTR. FOR HEALTH STAT., at 1, Table 1 (Aug. 2021) [https://www.cdc.gov/nchs/data/nhis/earlyrelease/Wireless\\_state\\_202108-508.pdf](https://www.cdc.gov/nchs/data/nhis/earlyrelease/Wireless_state_202108-508.pdf). CenturyLink’s Petition includes a typo related to the percentage of landline only users, stating 2.3 percent instead of the CDC’s reported 3.2 percent.

<sup>8</sup> Stephen J. Blumberg, & Julian V. Luke, *Wireless Substitution: Early Release Estimates from the National Health Interview Survey, July-December 2022*, NAT’L CTR. FOR HEALTH STATS., at 1 (May 2023) <https://www.cdc.gov/nchs/data/nhis/earlyrelease/wireless202305.pdf>.



1 consumers rely on landlines for telephone service, particularly in emergency situations  
2 or when power is lost to connect to emergency services.

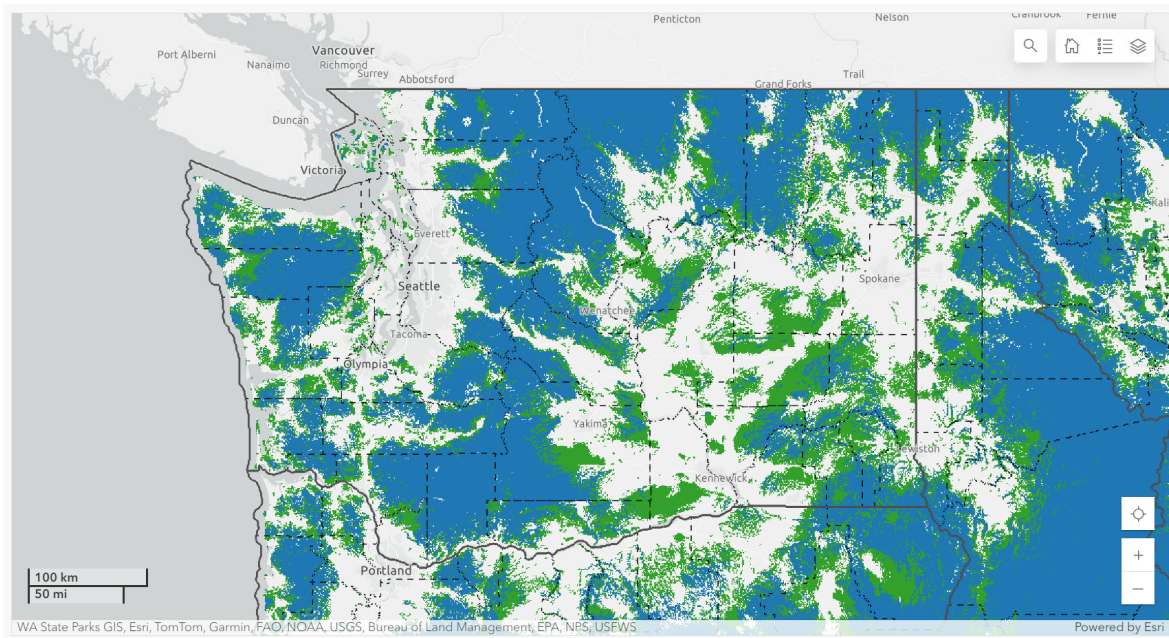
3           Though wireless services are widely used, there are gaps in coverage, which  
4 can be difficult to identify. Notably, the Federal Communications Commission (FCC)  
5 found that mobile carriers such as T-Mobile, Verizon, and U.S. Cellular overstate the  
6 coverage provided by their service maps about 40 percent of the time.<sup>9</sup> The FCC has  
7 also undertaken an effort to map areas that lack accessible 4G or 5G mobile broadband  
8 service. Zooming in on the FCC’s map of Washington gives a picture of areas where  
9 consumers may struggle with signal strength adequate for reliable voice calling.

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<sup>9</sup> FCC Rcd., MF-II Coverage Maps Investigation, Staff Report., GN Docket No. 19-367, at 2 (Dec. 4, 2019)  
<https://docs.fcc.gov/public/attachments/DOC-361165A1.pdf>.

1

**Figure 1 Washington Areas Without Unsubsidized Mobile Broadband<sup>10</sup>**



2 As noted above, a significant portion of Washingtonians rely on landline  
3 service some or all of the time. Those individuals tend to be older and may rely on  
4 their landline because mobile services are unavailable or unreliable at their home or  
5 businesses. Figure 1 above shows that many of the areas with less mobile reliability  
6 are in rural areas of Washington.

7 **Q. Can you elaborate on why a consumer might want to continue to rely on a**  
8 **landline?**

<sup>10</sup> FCC, *5G Fund – Areas Without Unsubsidized Mobile Broadband*, (updated Aug. 30, 2023)  
<https://www.fcc.gov/reports-research/maps/5g-fund-fnprm/> (found in Reports & Research by clicking on Maps).

1 A. Yes. As I mentioned above, some consumers may want to use a landline at their home  
2 because cell phone service is not available or unreliable in their area.<sup>11</sup> A recent story  
3 in the Washington Post interviewed Washingtonians in Enumclaw and Longview who  
4 have limited cell phone coverage at their residences.<sup>12</sup> In another story, a  
5 representative from the AARP noted, “Traditional landlines have provided reliable  
6 service for over a century, and while many consumers have adopted new technologies,  
7 not all have access to affordable alternatives to landlines.”<sup>13</sup> Some consumers may be  
8 concerned about access to emergency services. Copper-based landlines will continue  
9 to operate when power is out to an area, whereas other phone services require reliable  
10 back-up power to continue to operate and allow people to access emergency services.<sup>14</sup>  
11 This is of particular importance during wildfires or other natural disasters when it is  
12 imperative that those needed emergency services be able to access them. Other  
13 consumers may experience better call quality or can hear more clearly the person with  
14 whom they are speaking on a landline.<sup>15</sup> Some consumers may have other systems,  
15 such as home alarm systems that also rely on a copper landline.<sup>16</sup>

16 **Q. Please describe the sources of the data you are presenting.**

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<sup>11</sup> Betty Lin-Fisher, *Phone companies want to eliminate traditional landlines. What’s at stake and who loses?*, USA TODAY (Feb. 26, 2024), <https://www.usatoday.com/story/money/2024/02/22/att-phone-companies-eliminate-landlines/72574152007/>.

<sup>12</sup> Heather Kelly, *Landlines are dying out. But to some, they’re a lifeline*, WASH. POST (Mar. 23, 2024) <https://www.washingtonpost.com/technology/2024/03/23/landline-emergencies-home-phones/>.

<sup>13</sup> Lin-Fisher, *supra* note 11.

<sup>14</sup> Lin-Fisher, *supra*. note 11, See also, Michael Levenson, *Landline users remain proudly ‘old-fashioned’ in the digital age*, N.Y. TIMES (Mar. 19, 2024) <https://www.nytimes.com/2024/03/16/business/landline-phones-att.html>.

<sup>15</sup> Lin-Fisher, *supra* note 11.

<sup>16</sup> *Id.*

1 A. Public Counsel is part of the broader Consumer Protection Division within the  
2 Washington State Attorney General’s Office. The Consumer Protection Division also  
3 includes the Consumer Resource Center, which provides an “informal complaint  
4 resolution service” that consumers may access by contacting the Center via phone, an  
5 online complaint form, or postal mail.<sup>17</sup> At the end of 2023, I accessed the database  
6 and ran a search for complaints referencing CenturyLink or affiliated companies for  
7 the years 2018–2023 and exported them into an Excel spreadsheet. I added in county  
8 level information, as well as the Washington State Department of Health’s rural and  
9 urban county classifications.<sup>18</sup> These complaints are listed in Exhibit SKC-2.

10 I am also presenting information obtained via data request from the UTC’s  
11 Consumer Protection Division regarding complaints from consumers involving  
12 CenturyLink and its affiliated companies from 2019–2023. Similar to the AGO’s  
13 Consumer Resource Center, consumers may file a complaint with the UTC’s  
14 Consumer Protection Division via an online form, phone, email, or postal mail.<sup>19</sup> The  
15 data request response provided by Commission Staff is Exhibit SKC-3.

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<sup>17</sup> Wash. State Att’y Gen., *Consumer Protection Overview*, <https://www.atg.wa.gov/consumer-protection> (last visited Mar. 29, 2024)

<sup>18</sup> Wash. State Dep’t of Health, *Rural and Urban Counties*, (Apr. 2017) <https://doh.wa.gov/sites/default/files/legacy/Documents/Pubs/609003.pdf> (Document number DOH 609-003). In Washington, the Department of Health designates the following counties as rural: Adams, Asotin, Chelan, Clallam, Columbia, Cowlitz, Douglas, Ferry, Franklin, Garfield, Grant, Grays Harbor, Island, Jefferson, Kittitas, Klickitat, Lewis, Lincoln, Mason, Okanogan, Pacific, Pend Oreille, San Juan, Skagit, Skamania, Stevens, Wahkiakum, Walla Walla, Whitman, and Yakima. The following counties are designated urban: Benton, Clark, King, Kitsap, Pierce, Thurston, Snohomish, Spokane, and Whatcom. Counties are also designated as rural or urban by the U.S. Census Bureau. See U.S. Census Bureau, *Urban and Rural, County-level Urban and Rural information for the 2020 Census* (Updated Sept. 2023), <https://www.census.gov/programs-surveys/geography/guidance/geo-areas/urban-rural.html>.

<sup>19</sup> Wash. Utils & Transp. Comm’n, *File a Complaint* <https://www.utc.wa.gov/FileComplaint> (last visited Mar. 29, 2024).

1       **Q.     Please summarize the data from the AGO’s Consumer Resource Center.**

2       A.     There were 1718 complaints referencing CenturyLink or its affiliates filed with the  
3             AGO from 2018–2023. Consumers filing complaints who were over age 59 made up  
4             41 percent of total complaints, almost double the percentage of their share of  
5             Washington’s population.<sup>20</sup> Consumers residing in rural counties filed approximately  
6             19 percent of the complaints, which is equivalent to their share of Washington’s  
7             population.<sup>21</sup> Complaints from consumers living in rural Washington skewed older  
8             however, with consumers over 59 years old filing around 51 percent of the complaints.

9       **Q.     Can you provide examples of customer concerns with CenturyLink’s service?**

10      A.     Yes. The concerns of rural customers are typified by the following complaint from a  
11             customer near Colville, in Stevens County. The customer writes:

12                     My Centurylink landline is my only form of communication and  
13                     emergency contact to 911. I am a 68 year old widow with multiple  
14                     health issues and complications. [I] live alone over [two] miles from  
15                     any established road. I have had several occasions over the past year  
16                     where my home Centurylink service was non functioning for weeks  
17                     at a time. Most recently I spent days trying to contact and schedule  
18                     a service call...I am broken hearted at the thought that I might have  
19                     to leave the home [I] built with my late husband simply because the  
20                     phone doesn't work.<sup>22</sup>

21                     Another customer near Belfair, in Mason County, has concerns about service  
22                     quality and responsiveness of the Company:

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<sup>20</sup> Wash. Office of Fin. Mgmt., *Estimates of April 1 population by age, sex, race, and Hispanic origin*, (Updated Mar. 28, 2024) <https://ofm.wa.gov/washington-data-research/population-demographics/population-estimates/estimates-april-1-population-age-sex-race-and-hispanic-origin>. I used the state level data by age from 2020 and calculated the percentage of Washingtonians over 60 years old as 22 percent of the total population. See, Chase, Exh. SKC-4.

<sup>21</sup> U.S. Census Bureau, *Urban and Rural*, (Updated Sept. 2023) <https://www.census.gov/programs-surveys/geography/guidance/geo-areas/urban-rural.html> (See, County-level Urban and Rural information for the 2020 Census). According to the U.S. Census Bureau, in 2020, residents of rural designated counties made up 21 percent of Washington’s population.

<sup>22</sup> Chase, Exh. SKC-5 (Complaint of Roz Minch, Jan. 12, 2024).

1 Living in a rural area near Belfair, I have always relied on a landline  
2 telephone connection for internet as well as emergency services.  
3 Cellular service is not available. In August of [2023], my telephone  
4 and internet stopped working. I have repeatedly contacted the  
5 service provider, Century Link, to repair the service. It is now  
6 December and I still do not have a telephone. I have replaced the  
7 Century Link internet with service provided by Starlink, at  
8 significant additional cost, in order to restore emergency services.  
9 Even though Century Link has provided no service, they continue to  
10 charge my account for their service.<sup>23</sup>

11 Another customer from Port Angeles in Clallam County, also concerned about  
12 service quality states:

13 I have been a customer of Century Link for over 40 years at the same  
14 address for phone and internet service. My current internet plan is  
15 for 12 Mbps. Over the last year the speed we actually receive has  
16 declined. We are currently averaging a speed of 3.5 Mbps. I have  
17 made several inquiries regarding the issue...On my most recent call  
18 I was told I could sign up for a new internet plan for 20 Mbps. The  
19 soonest I could sign up would be May 26th as they don't have any  
20 technicians in our area. Unfortunately they are the only provider of  
21 internet Service for our location. How can they continue to sell a  
22 service they do not provide[?] It's like purchasing a gallon of milk  
23 and finding out there is only a pint in the container. They are a large  
24 corporation, do not care about the service they provide but insist that  
25 you sign up for auto pay. They are the only provider that we can use  
26 so we have no recourse.<sup>24</sup>

27 Other customers note the importance of access to CenturyLink's services to  
28 operate their business, work from home as an employee, or attend school. One  
29 customer stated:

30 We live on Mason Lake. Our Centurylink service went out on  
31 3/10/2023 ...There are only two service providers in our rural area,  
32 Astound Broadband or Centurylink. Astound has gaps in their  
33 service so for many of us Centurylink is our only option. All  
34 Centurylink customers on the lake remain without service...The cell  
35 phone coverage is very spar[s]e. To have cell service you have a

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<sup>23</sup> Chase, Exh. SKC-2 (Complaint of Michael Cornwall, Dec. 11, 2023).

<sup>24</sup> *Id.* (Complaint of Shelley Romero, Feb. 2, 2023).

1 booster that is connected to the internet router. No internet, no cell  
2 service, security cameras down, no ability to call 911 for  
3 emergencies...As a utility employee myself, there is no reason that  
4 they haven't come up with a plan, know what parts are needed, what  
5 date those parts will be in and what date they can get a crew to  
6 restore. Leaving all of us out of service for close to a month now is  
7 unacceptable without clear answers and plan to repair with timeline.  
8 I work from home and am commuting 80 miles a day. My kids can't  
9 do homework. Our son is ...unable to attend his classes without  
10 going to the library, drive 15 minutes to a free hot spot (thank you  
11 pandemic). Maybe you can get answers as my every other day calls  
12 are getting no answers.<sup>25</sup>

13 **Q. Please summarize the data from the UTC's Consumer Protection Division.**

14 A. From 2019–2023, the UTC's Consumer Protection Division received nearly 1800  
15 complaints about CenturyLink.<sup>26</sup> Of the complaints reported in Staff's Response to  
16 Public Counsel Data Request No. 3, 1302 involve issues with quality of service.<sup>27</sup>  
17 There are also a higher proportion of complaints from rural counties, making up  
18 approximately 32 percent of complaints.<sup>28</sup> Staff's records about the proportion of  
19 complaints about CenturyLink compared to all complaints received by the UTC are  
20 important to review as well.

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22 ///

23 ////

24 /////

25 //////

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<sup>25</sup> Chase, Exh. SKC-2 (Complaints (2021-2023) of Monica McIntyre, Apr. 6, 2023).

<sup>26</sup> Chase, Exh. SKC-3 (Staff Response to PC-3 Excel spreadsheet, Staff Response to PC-6 Excel spreadsheet).

<sup>27</sup> *Id.* (Staff Response to PC-3 Excel spreadsheet).

<sup>28</sup> *Id.* (Staff Response to PC-3 Excel spreadsheet).

1 **Table 1. Complaints Received by UTC’s Consumer Protection Division<sup>29</sup>**

	<b>2019 Total Complaints</b>	<b>2020 Total Complaints</b>	<b>2021 Total Complaints</b>	<b>2022 Total Complaints</b>	<b>2023 Total Complaints</b>
CenturyLink Communications	169	238	333	486	573
Telecommunications	303	360	453	560	646
All Complaints	897	756	989	1288	1107
<b>Percentages</b>					
CenturyLink/All Complaints	19%	31%	34%	38%	52%
CenturyLink/All Telecommunications	56%	66%	74%	87%	89%

2 This table highlights several important facts. First, the raw numbers of complaints  
 3 involving CenturyLink have increased every year for the last five years. Second, the  
 4 proportion of complaints about CenturyLink has also increased every year, both when  
 5 comparing complaints about CenturyLink to complaints received by the UTC  
 6 involving all telecommunications companies or all UTC regulated companies. Third,  
 7 complaints about CenturyLink are the majority of complaints about  
 8 telecommunications companies, and nearly all of them in 2022 and 2023. Fourth,  
 9 consumer complaints about CenturyLink made up over half of the complaints received  
 10 by the UTC across all industries in 2023. These are facts that the Commission should  
 11 keep in mind as they are reviewing CenturyLink’s petition.

12 **Q. Have you reviewed any information about concerns involving CenturyLink’s**  
 13 **service in other states?**

<sup>29</sup> *Id.* (Staff Response to PC-6 Excel spreadsheet).



1 A. Yes. I reviewed an order from the Minnesota Public Utilities Commission discussing  
2 whether CenturyLink had violated Minnesota’s requirements surrounding service  
3 quality.<sup>30</sup> I also reviewed an order from the Oregon Public Utilities Commission  
4 regarding a price plan and stipulation for service quality for the Jacksonville, Oregon  
5 area.<sup>31</sup> Though the cases involving Minnesota and Oregon are not about service in  
6 Washington, there are common issues, as evidenced by the increasing number of  
7 complaints about service quality as well as narrative statements above from  
8 Washington consumers.

9           Similar to Washington, many rural areas in Minnesota served by CenturyLink  
10 lack access to broadband.<sup>32</sup> One rural Minnesota county had so many CenturyLink  
11 service outages in the last several years, that local volunteer fire departments leave  
12 their facilities “unlocked or staff them continuously during telephone service outages,  
13 so that affected members of the public can drive to the fire halls and directly contact  
14 emergency dispatchers.”<sup>33</sup>

15           In the Jacksonville, Oregon area, CenturyLink has had such persistent issues  
16 with service quality, that the Company is required to have a dedicated customer  
17 support line and address issues within 48 hours of a ticket being created.<sup>34</sup>

18 CenturyLink’s challenges in serving customers are not limited to Washington.

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<sup>30</sup> Findings of Fact, Conclusions of Law, and Recommendations, *In re CenturyLink in Minnesota, on Behalf of the Communications Workers of America*, Docket No. P-421/C-20-432, (Mar. 13, 2024) (Minn. Pub. Util. Comm’n) [hereinafter *CenturyLink Minnesota Docket*].

<sup>31</sup> *In the Matters of In re Lumen Technologies*, Dockets UM 1908 & UM 2206. Order No. 24-041 (Feb 09, 2024) (Pub Util. Comm’n Org.).

<sup>32</sup> *CenturyLink Minnesota Docket*, Findings of Fact, Conclusions of Law, and Recommendations, ¶ 24.

<sup>33</sup> *Id.*, ¶ 35.

<sup>34</sup> *Lumen Technologies, supra* note 31, at 2.

- 1     **Q.     Does this conclude your testimony?**
- 2     A.     Yes, it does.