



**CENTURYLINK**  
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**Lisa A. Anderl**  
Assistant General Counsel  
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April 17, 2019

*Via Web Portal*

Mr. Mark L. Johnson  
Executive Director and Secretary  
Washington Utilities & Transportation Commission  
1300 S. Evergreen Park Drive SW  
P.O. Box 47250  
Olympia, Washington 98504-7250

Received  
Records Management  
04/17/19 16:15  
State Of WASH.  
UTIL. AND TRANSP.  
COMMISSION

**Re: Docket No.: UT-180831  
Request to Stop Tracking Service Denials**

Dear Mr. Johnson:

Enclosed for filing is a spreadsheet showing six months of data regarding denials of service due to a lack of CenturyLink facilities.

On January 31, 2019 CenturyLink asked to be relieved of its obligation to collect and submit data regarding denials of service due to a lack of facilities. On March 6, 2019 the Administrative Law Judge issued a notice denying the request. The notice further stated that the Commission “will hold CenturyLink’s request in abeyance until the Company has collected and submitted six months of the requisite data. After that time, CenturyLink may renew its request. Any such filing, however, should provide sufficient detail on the costs the Company is incurring to comply with Order 03 and an explanation of why those costs outweigh the benefits of the data to the Commission and stakeholders in Docket UT-180831.”

CenturyLink renews its request to be relieved of the obligation to collect data regarding requests for service that are denied due to a lack of facilities. The company continues to incur costs and expend resources to collect this data, and there has, to date, been no established schedule for the analysis of this data, and no stated purpose for continued compilation. At least four people are involved in gathering and reviewing the data each month, and the time spent exceeds 20 hours per month. While the cost of collection is real, the data collected is of questionable value. First, CenturyLink is unable to readily distinguish between requests for internet service and phone service. Second, the data does not reveal whether people seeking phone service got it from another provider or went unserved, although it strongly suggests that in most if not all instances the address is served by another provider. Unless and until a review of the data already collected

Mr. Mark L. Johnson  
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Page 2

shows it to be of substantial value to inform further action or progress in the rulemaking docket, UT-180831, the cost of collecting more data is unwarranted.

Sincerely,

*/s/ Lisa A. Anderl*  
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