

**Exh. SP-11  
Docket UT-240078  
Witness: Sharmila Prabakaran**

**BEFORE THE WASHINGTON  
UTILITIES AND TRANSPORTATION COMMISSION**

**WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION,**

**Complainant,**

**v.**

**CENTURYLINK COMMUNICATIONS  
LCC d/b/a LUMEN TECHNOLOGIES  
GROUP,**

**Respondent.**

**DOCKET UT-240078**

**TESTIMONY OF**

**SHARMILA PRABAKARAN**

**STAFF OF  
WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION**

*October 26, 2023 Staff Follow-up Email*

**May 30, 2024**

**From:** Prabakaran, Sharmila (UTC)  
**To:** "Gose, Peter J"  
**Cc:** Feeser, Bridgit (UTC)  
**Subject:** RE: Data Request # 3  
**Date:** Thursday, October 26, 2023 12:02:00 PM  
**Attachments:** [image004.png](#)  
[image005.jpg](#)  
[image006.jpg](#)  
[image007.jpg](#)

Hi Peter,

Thank you for your responses. I have questions regarding the company's compliance with WAC 480-120-133 - Response time for calls to business office or repair center during regular business hours, which states:

(1) Calls placed to a company's business or repair center during regular business hours must be answered either by a live representative or an automated call answering system.

(2) Companies that use an automated answering system must comply with the following requirements:

(a) Each month, the average time until the automated system answers a call must not exceed thirty seconds; and

(b) The automated system must provide a caller with an option to speak to a live representative within the first sixty seconds of the recorded message, or it must transfer the caller to a live representative within the first sixty seconds.

(i) A company may provide the live representative option by directing the caller to take an affirmative action (e.g., select an entry on the telephone) or by default (e.g., be transferred when the caller does not select an option on the telephone).

(ii) The recorded message must clearly describe the method a caller must use to reach a live representative.

(c) Each month, the average time until a live representative answers a call must not exceed sixty seconds from the time a caller selects the appropriate option to speak to a live representative.

(3) Companies that do not use an automated answering system must answer at least ninety-nine percent of call attempts, each month, within thirty seconds.

### Questions

1) Why does the company not collect data for the company's repair center and business center as required in WAC 480-120-133 (2)(a) to show the average time until the automated system answers a call?

2) Why does the company not collect data for the company's repair center and business center as required in WAC 480-120-133 (2)(b) to show the number of seconds it takes the automated system to provide a caller with an option to speak to or transfer to a live

representative?

3) Why has the company not provided data for each month for both the repair center and business office, the average time until a live representative answered a call from the time a caller selected the appropriate option to speak to a live representative, as required in WAC 480-120-133(2)(c)?

In two previous consumer complaints the company provided data for each month for both the repair center and business office, the average time until a live representative answered a call from the time a caller selected the appropriate option to speak to a live representative. In a follow-up formal investigation, the same data for a different time period was provided in response to a data request.

Most recently, after several requests for the company to provide data for each month for both the repair center and business office, the average time until a live representative answered a call from the time a caller selected the appropriate option to speak to a live representative, the company has not provided the requested data. Staff requested the data in two separate data requests for a combined timeframe of Sept. 1, 2021, through Aug. 30, 2023. The company has not provided the data for the repair center for Sept. 1, 2021, through March 30, 2022, or for Dec. 1, 2022, through Aug. 30, 2023. The company also has not provided the data for the business office for Dec. 1, 2022, through Aug. 30, 2023.

4) Please provide each month for the repair center, the average time until a live representative answered a call from the time a caller selected the appropriate option to speak to a live representative for the time period of Sept. 1, 2021, through March 30, 2022, and for Dec. 1, 2022, through Aug. 30, 2023, by **November 02, 2023**.

5) Please provide each month for the business office, the average time until a live representative answered a call from the time a caller selected the appropriate option to speak to a live representative for the time period of Dec. 1, 2022, through Aug. 30, 2023, by **November 02, 2023**.

This is our final attempt to obtain responses to the data requests provided to the company before proceeding with our investigation.

*Thank you,*

***Sharmila Prabakaran***

*(Pronouns: She/Her/Hers)*

*Investigator, Consumer Protection and Communications*

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