

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

**WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,**

Complainant,

v.

**CENTURYLINK COMMUNICATIONS,
LLC,**

Respondent.

DOCKET UT- 181051

**EXHIBIT TO
TESTIMONY OF**

STACY J. HARTMAN

**ON BEHALF OF
CENTURYLINK COMMUNICATIONS, LLC**

CLC RESPONSE TO DATA REQUEST STAFF 20 (WITHOUT ATTACHMENT)

March 31, 2022

To: Public Counsel
Re: Docket UT-181051
CenturyLink's Responses to Public Counsel DR Nos. 1-6
April 22, 2021
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PC-6 Please provide a copy of any data requests sent to CenturyLink regarding the December 2018 outage along with all responses.

RESPONSE:

CLC objects to this request as not reasonably calculated to lead to the discovery of admissible evidence to the extent it seeks information or documents that do not pertain to a Washington investigation or to operations or outage effects outside of Washington. Without waiving its objections, CLC responds as follows.

Washington Commission Staff issued informal data requests to CenturyLink in September 2019, January 2020 and August 2020. Those requests and responses are attached, respectively, as Attachments PC-6(a) (Bates CLC-000001 – 000018), PC-6(b) (Bates CLC-000019 – 000049), and Confidential Attachment PC-6(c) (Bates CLC-000050 – 000100). In February 2019, CenturyLink responded to a Civil Investigative Demand by the Washington Attorney General. The CID and responses are attached as Confidential Attachment PC-6(d) (Bates CLC-000101 - 000146).

In addition, CenturyLink received requests for information and documents from the Federal Communications Commission in connection with the December 2018 outage. CLC will supplement its response with those requests and the company's responses.

SUPPLEMENTAL RESPONSE (May 4, 2021):

Without waiving its objections, CLC supplements this response as follows.

CenturyLink was asked several series of questions by the United States Department of Justice ("DOJ") and the Federal Communications Commission ("FCC"). Those questions and answers (to the extent there were written answers) are attached, respectively as follows:

Attachment PC-6(e) (Bates CLC 000147 – 000151): DOJ January 15, 2019
Attachment PC-6(f) (Bates CLC-000152 – 000158): FCC February 6 and 21, 2019
Attachment PC-6(g) (Bates CLC 000159 – 000172): FCC February 19, 2019 (Infinera questions)
Attachment PC-6(h) (Bates CLC-000173 – 000586): FCC November 22, 2019
Attachment PC-6(i) (Bates CLC-000587 – 000925): FCC January 15, 2020
Attachment PC-6(j) (Bates CLC-000926 – 001420): FCC February 5, 2020
Attachment PC-6(k) (Bates CLC 001421 – 001453): FCC March 20, 2020

Respondent: CenturyLink Legal