

November 14, 2018

Mr. Mark L. Johnson  
Executive Director and Secretary  
Washington Utilities and Transportation Commission  
P.O. Box 47250  
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Records Management  
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State Of WASH.  
UTIL. AND TRANSP.  
COMMISSION

**Re: Docket A-130355, Rulemaking to Consider Possible Corrections and Changes in WAC 480-07, Relating to Procedure Rules**

Dear Mr. Johnson:

This comment letter is submitted on behalf of CenturyLink in response to the Commission's Notice of Opportunity to Submit Written Comments dated October 17, 2018 regarding proposed amendments to the Commission's standard protective order. CenturyLink has only one comment on the proposed amendments, set forth below.

CenturyLink recommends deleting the second sentence of Section A, General Provision: "**The Commission expects Confidential Information to include only numbers, customer names, and planning details.**" After a great deal of time and effort, the Commission amended the definition of Confidential Information in WAC 480-07-160 to distinguish it from information exempt from the disclosure requirements of the Public Records Act. The sentence referenced above conflicts with the newly adopted definition of Confidential Information. For example, customer names, which would likely fall under the former definition of Confidential Information, would not likely meet the current definition of Confidential Information. Further, establishing a Commission expectation of Confidential Information that differs in any way from the codified definition of Confidential Information invites potentially conflicting standards. CenturyLink believes the Commission established its expectations through its adoption of the definition itself, and any additional description is unnecessary and potentially confusing. Thank you for the opportunity to file comments. If we can be of any further assistance, please contact Donna Barnett at 425-635-1419 or Lisa Anderl at 206-345-1574.

Sincerely,



Donna L. Barnett