

**Exh. SP-13
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**

February 15, 2024 CenturyLink Response to UTC Data Request

May 30, 2024

CENTURYLINK RESPONSE TO WUTC STAFF DATA REQUEST

<p>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?</p>	<p>1. WAC 480-120-133(2)(a) does not require the company to collect data; it specifies that "[e]ach month, the average time until the automated system answers a call must not exceed thirty seconds." As explained in the March 2023 data request, there is no data to collect as the automated system answers immediately. The gap or time delay from a network perspective from when the customer calls the CenturyLink toll free customer care number until the Genesys automated system answers the call is non-existent. As such there is nothing to measure as no time elapses. Like any other phone call, 1 or 2 ring cycles may occur before the network completes the connection. As soon as that connection is made the call is answered and the customer receives a welcome message from the automated answering system.</p>
<p>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?</p>	<p>2. WAC 480-120-133(2)(b) does not require the company to collect data; it specifies that "[t]he 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." CenturyLink's automated system has been designed to provide a caller with an option to speak to a live representative within the first sixty seconds of the recorded message. When a customer calls into the automated IVR system they receive a welcome message and an option for Spanish assistance. For English callers the automated IVR system looks at the phone number the customer is calling from (automatic number identification or "ANI") and attempts to associate that number with a customer account. If the ANI is associated with a customer account, the IVR announces "I see your calling from XXX-XXX-XXXX. Is that the number your calling about?" For Washington customers, if the customer says yes the IVR immediately announces "You have the option to speak to a representative during your call by saying "Request Representative." This sequence takes approximately 40 seconds as long as the customer is selecting correct options and answering the prompts. If the customer is not identified via the ANI, the IVR asks them to enter their telephone number. After entering a telephone number, they then receive the same IVR announcement of "You have the option to speak to a representative during your call by saying "Request Representative." This is completed within 60 seconds. If the customer is struggling to enter options or refusing to enter information in the IVR, the system then falls back to prompting then for the state they are calling about and then speak the same message. Again, since the automated system has been designed, tested, and proven to provide an option to speak with a live representative within the first sixty seconds of the recorded message, CenturyLink systems do not track average time from the beginning of a call until the automated system provides a caller with an option to speak to a live representative. Each caller controls the options IVR options selected and the length of time they spend prior to requesting to speak to a representative is in the hands of the customer.</p>
<p>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)?</p> <p>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.</p> <p>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.</p>	<p>CenturyLink apologizes for the delayed response. The employee assigned to gather and forward the information left the company abruptly on 11/01/2023.</p> <p>As set forth in requests #4 and #5 below, CenturyLink provides the requested data for both the repair center and business office from December 1, 2022 through August 30, 2023. While gathering this information, an additional four (4) months of data was supplied beyond that requested. Information for those additional months through December 2023, is included in the responses to requests #4 and #5 below.</p> <p>As explained in previous responses, and reiterated in this response and in response to request #4 below, answer speed data for the repair center for Sept. 1, 2021, through March 30, 2022, was lost when CenturyLink migrated platforms utilized in the provision of customer care operations in January 2022.</p>
<p>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.</p>	<p>4. See response below. Times are presented in seconds. In January 2022 CenturyLink migrated platforms utilized in the provision of customer care operations. Due to a migration to a new customer care provisioning system, the information presented below is that which is readily available.</p>

	9/1/2021	10/1/2021	11/1/2021	12/1/2021	1/1/2022	2/1/2022	3/1/2022							
WA Wireline Service - Repair Center	Unavailable	Unavailable	Unavailable	Unavailable	Unavailable	Unavailable	Unavailable							
	12/1/2022	1/1/2023	2/1/2023	3/1/2023	4/1/2023	5/1/2023	6/1/2023	7/1/2023	8/1/2023	9/1/2023	10/1/2023	11/1/2023	12/1/2023	
WA Wireline Service - Repair Center	5	7	7	9	14	9	14	35	31	20	3	2	2	

Information supplied by Christopher Long

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.** 5. See response below. Times are presented in seconds.

	12/1/2022	1/1/2023	2/1/2023	3/1/2023	4/1/2023	5/1/2023	6/1/2023	7/1/2023	8/1/2023	9/1/2023	10/1/2023	11/1/2023	12/1/2023	
WA Wireline Service - Business Office	8	13	14	16	11	16	14	10	14	8	10	7	7	

Information supplied by Christopher Long

6 **The name, title, telephone number, and e-mail address of the contact person that our staff can work with directly for questions that may arise concerning any details of the data.** 6. Peter Gose, Director State and Local Government Affairs, 816-759-2895, peter.gose@lumen.com