

**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**

**MARTIN D. VALENCE**

**ON BEHALF OF  
CENTURYLINK COMMUNICATIONS, LLC**

*STAFF SUPPLEMENTAL RESPONSE TO CTL DATA REQUEST 16(B)*

**March 31, 2022**

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION STAFF  
RESPONSES TO DATA REQUESTS

DATE PREPARED: February 25, 2022  
DOCKET: UT-181051  
REQUESTER: CenturyLink

WITNESS: James Webber  
RESPONDER: James Webber  
TELEPHONE: (312) 952-6694

**REQUEST NO. 16:**

At pages 1-3 of his Direct Testimony (Exhibit JDW-1CT) and in Exhibit JDW-2, Mr. Webber summarizes his credentials and experience.

- a. Please identify and fully describe Mr. Webber's education, experience and credentials that qualifies him to opine on: (i) network design; (ii) appropriate safeguards within the network to prevent packets from traversing a path.
- b. Identify and produce any testimony or other writings submitted by Mr. Webber wherein he recommends that telecommunications providers disregard or depart from an equipment manufacturer's installation specification and/or equipment configuration guidance.
- c. Has Mr. Webber ever submitted testimony regarding 911 systems? If yes, please identify, describe and produce copies of all such testimonies.
- d. Has Mr. Webber ever submitted testimony regarding emergency services? If yes, please identify, describe and produce copies of all such testimonies.
- e. Identify and describe all 911 and/or emergency services cases, matters or projects Mr. Webber worked on, including but not limited to while an employee of the Illinois Commerce Commission.
- f. Has Mr. Webber ever designed, constructed or maintained a (i) telecommunications network or (ii) national fiber network? If your answer to either subpart is anything other than no, please fully explain.
- g. Has Mr. Webber ever testified before a public utilities commission or in court regarding the extent of a state public utility commission's jurisdiction over a telecommunications provider's interstate/national network, services or equipment? If yes, please identify, describe and produce copies of all such testimonies.

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**RESPONSE TO REQUEST NO. 16(a):** Staff objects to this request as overbroad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence, and/or not proportionate to the needs of the case. Staff further objects that this request would improperly require the creation of new data and/or documents on the part of Staff. *See* WAC 480-07-400(1)(c)(iii). Staff further objects on the basis that the material sought by the request is: (a) already in the Company’s possession, custody, or control; (b) publically available; and/or (c) obtainable from some other source that is more convenient, less burdensome, or less expensive.

Subject to and without waiving the above objections, Staff provides the following response:

Mr. Webber has done work related to network design, telecommunications service costs and revenue analyses, interconnection, Unbundled Network Elements (“UNEs”), signaling, transport and switching in telecommunications networks, among other issues, and, in doing so, has collaborated with and been trained by operational and engineering personnel for nearly nearly three decades. *See* Webber, Exh. JDW-1CT at 1:10 – 3:21, Webber, Exh. JDW-2.

**CONFIDENTIAL RESPONSE TO REQUEST NO. 16(b):** Staff objects to this request as overbroad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence, and/or not proportionate to the needs of the case. Staff further objects on the basis that the material sought by the request is: (a) already in the Company’s possession, custody, or control; (b) publically available; and/or (c) obtainable from some other source that is more convenient, less burdensome, or less expensive.

Subject to and without waiving the above objections, Staff provides the following response:

*See* Webber Exh. JDW-1CT at 21:3-11, 23:11 – 24:19, 30:11 – 33:23.

This data request mischaracterizes Mr. Webber’s testimony. Mr. Webber testified that

[REDACTED]

Mr. Webber’s testimony is consistent with guidance provided by both the FCC and the U.S. National Security Agency. Webber, Exh. JDW-4 at 15 (“System features that are not in use should be turned off or disabled”); Webber, Exh. JDW-17.