

Attachment A



STATE OF WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION

621 Woodland Square Loop S.E. • Lacey, Washington 98503

P.O. Box 47250 • Olympia, Washington 98504-7250

(360) 664-1160 • TTY 1-800-833-6384 or 711

December 29, 2022

Dave Namura
State and Local Government Affairs
CenturyLink Communications LLC
d/b/a Lumen Technologies Group
1600 7th Avenue, 15th Floor
Seattle, WA 98191

Dear Dave Namura:

The Utilities and Transportation Commission is conducting an investigation into the business practices of CenturyLink Communications LLC d/b/a Lumen Technologies Group (CenturyLink) related to its response times when a customer selects to speak to a live representative.

Under Washington state law, RCW 80.04.090, the commission has the authority to inspect the accounts, books, papers, and documents of any telecommunications company doing business in this state.

In order to complete this investigation commission staff requires the following documents and information:

1. Please provide the monthly call data for the average time until the automated system answered calls.
2. Please provide the monthly call data for the average time until the automated system provided a caller with an option to speak to a live representative, or transferred the caller to a live representative.
3. Please provide the monthly call data for the average time until a live representative answered a call from the time the caller selected the appropriate option to speak to a live representative.
4. Please provide a copy of the automated system recorded message that provides guidance for callers.

Respect. Professionalism. Integrity. Accountability.

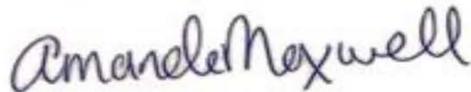
Dave Namura
December 29, 2022
Page 2

5. For data requested in 1, 2, and 3, provide the lists in Excel spreadsheet format, identify the month and year, and indicate the type of call (repair or business office) from September 01, 2021, through November 30, 2022.
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.

Please provide all requested information no later than **January 12, 2023**, in electronic format using Microsoft Word for narrative documents and Excel for data. Extension requests may be granted on a case-by-case basis. A request for extension must be made in writing prior to the deadline and must include the reason for the extension.

The response should be directed to Sharmila Prabakaran, Compliance Investigations. Please include a copy of this letter with your response. If you have questions regarding this request, please contact Sharmila Prabakaran at (360) 664-1129 or sharmila.prabakaran@utc.wa.gov.

Sincerely,



Amanda Maxwell
Executive Director and Secretary

Attachment B

From: Prabakaran, Sharmila (UTC)
To: david.namura@centurylink.com
Subject: Data Request
Date: Wednesday, February 22, 2023 11:05:00 AM
Attachments: image001.png
CTL_CallTime_DR_CenturyLink Dec 2022 (003)_13941.pdf

Hi Dave Namura,

The attached data request letter was mailed to CenturyLink Communications LLC d/b/a Lumen Technologies Group on December 29th, 2022. And the company's response was due in Jan 12, 2023. Until now we have not received any responses from the company yet.

Please let me know why the documents were not provided by the due date and when the company plans to respond?.

You may reach me at sharmila.prabakaran@utc.wa.gov or (360) 664-1129 for any further questions.

Thank you,

Sharmila Prabakaran

(Pronouns: She/Her/Hers)

Investigator, Consumer Protection and Communications

sharmila.prabakaran@utc.wa.gov

Office: (360) 664-1129



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December 29, 2022

Dave Namura
State and Local Government Affairs
CenturyLink Communications LLC
d/b/a Lumen Technologies Group
1600 7th Avenue, 15th Floor
Seattle, WA 98191

Dear Dave Namura:

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In order to complete this investigation commission staff requires the following documents and information:

1. Please provide the monthly call data for the average time until the automated system answered calls.
2. Please provide the monthly call data for the average time until the automated system provided a caller with an option to speak to a live representative, or transferred the caller to a live representative.
3. Please provide the monthly call data for the average time until a live representative answered a call from the time the caller selected the appropriate option to speak to a live representative.
4. Please provide a copy of the automated system recorded message that provides guidance for callers.

Respect. Professionalism. Integrity. Accountability.

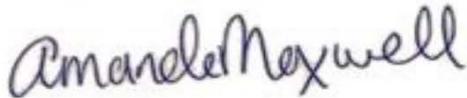
Dave Namura
December 29, 2022
Page 2

5. For data requested in 1, 2, and 3, provide the lists in Excel spreadsheet format, identify the month and year, and indicate the type of call (repair or business office) from September 01, 2021, through November 30, 2022.
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.

Please provide all requested information no later than **January 12, 2023**, in electronic format using Microsoft Word for narrative documents and Excel for data. Extension requests may be granted on a case-by-case basis. A request for extension must be made in writing prior to the deadline and must include the reason for the extension.

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Sincerely,



Amanda Maxwell
Executive Director and Secretary

Attachment C

From: Gose, Peter J <Peter.Gose@lumen.com>
Sent: Wednesday, February 22, 2023 12:42 PM
To: Prabakaran, Sharmila (UTC) <sharmila.prabakaran@utc.wa.gov>
Cc: Namura, David <David.Namura@lumen.com>
Subject: WUCT Information Request

External Email

Hello Sharmila,

I am responding on behalf of David Namura as he is away from the office today. To the best of our knowledge the letter you forwarded today was not received in David's office. Around the time the correspondence was mailed, a number of Lumen employees were moving offices, and this may have contributed to the missing of your correspondence. I have requested the information sought in the correspondence you attached to your email to David today and will work to supply it as quickly as possible.

For future USPS mail correspondence to David Namura, please use the following address:

120 Lenora Street

Seattle, WA 98121

Thank you and I will be back in touch with responses as quickly as possible.

Peter Gose

Director State and Local Government Affairs

14530 NW 63rd St. Parkville, MO 64152

tel: 816-759-2895 | cell: 303-324-5678

peter.gose@lumen.com

LUMEN[®]

Attachment D

From: Prabakaran, Sharmila (UTC)
To: "David.Namura@lumen.com"
Subject: FW: WUCT Information Request
Date: Thursday, March 16, 2023 2:06:00 PM
Attachments: image002.jpg
image005.png
CTL_CallTime_DR_CenturyLink Dec 2022.pdf
image001.jpg

Dave Namura,

I'm reaching out to you again regarding the data request letter that was mailed to CenturyLink Communications LLC d/b/a Lumen Technologies Group on December 29th, 2022, to the address on file with the Commission. The company's response was due Jan 12, 2023.

I sent you a follow up email on Feb. 22 letting you know that staff had not received responses to the data request, and asked what the company's plan was for responding. Peter Gose responded on Feb. 22 saying the company had not received the Dec. 29 data request because it was mailed to the wrong address. Peter also stated he had requested the information sought in the correspondence attached to the Feb. 22 email I sent to you and would supply it as quickly as possible.

To date, we still have not received any responses or further communication from the company about the attached data request. To avoid potential enforcement action which could result in penalties, please provide responses right away.

You may reach me at sharmila.prabakaran@utc.wa.gov or (360) 664-1129 for any further questions.

Thank you,

Sharmila Prabakaran

(Pronouns: She/Her/Hers)

Investigator, Consumer Protection and Communications

sharmila.prabakaran@utc.wa.gov

Office: (360) 664-1129



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December 29, 2022

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State and Local Government Affairs
CenturyLink Communications LLC
d/b/a Lumen Technologies Group
1600 7th Avenue, 15th Floor
Seattle, WA 98191

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3. Please provide the monthly call data for the average time until a live representative answered a call from the time the caller selected the appropriate option to speak to a live representative.
4. Please provide a copy of the automated system recorded message that provides guidance for callers.

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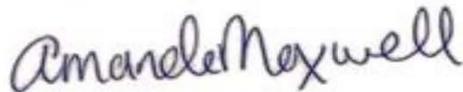
Dave Namura
December 29, 2022
Page 2

5. For data requested in 1, 2, and 3, provide the lists in Excel spreadsheet format, identify the month and year, and indicate the type of call (repair or business office) from September 01, 2021, through November 30, 2022.
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.

Please provide all requested information no later than **January 12, 2023**, in electronic format using Microsoft Word for narrative documents and Excel for data. Extension requests may be granted on a case-by-case basis. A request for extension must be made in writing prior to the deadline and must include the reason for the extension.

The response should be directed to Sharmila Prabakaran, Compliance Investigations. Please include a copy of this letter with your response. If you have questions regarding this request, please contact Sharmila Prabakaran at (360) 664-1129 or sharmila.prabakaran@utc.wa.gov.

Sincerely,



Amanda Maxwell
Executive Director and Secretary

Attachment E

From: Gose, Peter J
To: Prabakaran, Sharmila (UTC)
Subject: Data Request Responses
Date: Thursday, March 30, 2023 3:11:38 PM
Attachments: [image001.jpg](#)
[image002.jpg](#)
[WUTC Staff Data Request 3-30-23.xlsx](#)

External Email

Hello Sharmila,

Please see the attached Excel file containing data request responses. If you have questions, please get in touch with me any time using my contact information below.

Thank you.

Peter Gose
Director State and Local Government Affairs
14530 NW 63rd St. Parkville, MO 64152
tel: 816-759-2895 | cell: 303-324-5678
peter.gose@lumen.com

This communication is the property of Lumen Technologies and may contain confidential or privileged information. Unauthorized use of this communication is strictly prohibited and may be unlawful. If you have received this communication in error, please immediately notify the sender by reply e-mail and destroy all copies of the communication and any attachments.

CENTURYLINK RESPONSE TO WUTC STAFF DATA REQUEST

1 Please provide the monthly call data for the average time until the automated system answered calls.

1. There is no gap or 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. 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 as described mor fully in response to data request number 2.

2 Please provide the monthly call data for the average time until the automated system provided a caller with an option to speak to a live representative, or transferred the caller to a live representative.

2. 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. 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.

Information supplied by Fred Bak

3 Please provide the monthly call data for the average time until a live representative answered a call from the time the caller selected the appropriate option to speak to a live representative.

3. See response below. Times are presented in seconds. In January 2022 CenturyLink migrated platforms utilized in the provision of customer care opearitions. Due to a migration to a new customer care provisioning system, the information presented below is that which is readily available.

	9/1/2021	10/1/2021	11/1/2021	12/1/2021	1/1/2022	2/1/2022	3/1/2022	4/1/2022	5/1/2022	6/1/2022	7/1/2022	8/1/2022
WA Wireline Service - Residence and Small Business - Business Office/Care								15	17	13	9	10
WA Internet / Broadband - Business Office/Care								86	253	291	274	216
Total WA					202	147	142	83	185	194	185	152

Information supplied by Ari Klots

4 Please provide a copy of the automated system recorded message that provides guidance for callers.

4. When calling 800-241-1111 a customer enters the automated IVR system and they receive a welcome to CenturyLink message and an option for Spanish assistance. For English callers the automated IVR system looks at the phone nuner 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 customers with a Washington number who respond affirmatively, the IVR immediately announces "You have the option to speak to a representative during your call by saying "Request Representative." 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." Throughout the IVR experience, there are myriad branches and options that provide guidance for callers. That set forth above specifically pertains to options at the front end of the process to expeditiously put a customer in touch with a live representative. This IVR system

5 For data requested in 1, 2, and 3, provide the lists in Excel spreadsheet format, identify the month and year, and indicate the type of call (repair or business office) from September 01, 2021, through November 30, 2022.

5. See responses to items 1, 2 and 3 above.

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

Attachment F

From: Prabakaran, Sharmila (UTC)
To: Gose, Peter J
Cc: david.namura@centurylink.com
Subject: RE: Data Request Responses
Date: Monday, May 8, 2023 2:49:00 PM
Attachments: image003.png
image004.jpg
image002.jpg

Hi Peter,

Thank you for your responses. I've some follow up questions regarding some of the responses provided. Please see below.

1. The company indicated in its response to Q-3 that it provided information that was readily available and did not include requested data for 9/1/2021 thru 3/1/2022. Please provide data for the entire timeframe requested - 9/1/2021 thru 3/1/2022.
2. In Q-5 staff requested data by month and year in an Excel spreadsheet for each type of call (repair or business office) from September 01, 2021, through November 30, 2022. Staff is unable to determine if the company submitted data by month and year for each type of call made to a repair office and business office. Please provide the monthly call data for the average time until a live representative answered a call from the time the caller selected the appropriate option to speak to a live representative for all calls made a) a repair office and b) all calls made to a business office.
3. Please explain what measures and processes were put in place, and changes the company made since September 1, 2021, to ensure a live representative answers calls to the repair office and calls to the business office within 60 seconds.
4. How many automated lines for a repair office in Washington State does the company have?
5. How many automated lines for a business office in Washington State does the company have?

Please contact if you have any questions regarding the data request.

Thank you,

Sharmila Prabakaran

(Pronouns: She/Her/Hers)

Investigator, Consumer Protection and Communications

sharmila.prabakaran@utc.wa.gov

Office: (360) 664-1129

Attachment G

From: Feeser, Bridgit (UTC) <bridgit.feeser@utc.wa.gov>
Sent: Wednesday, June 7, 2023 4:04 PM
To: Gose, Peter J <Peter.Gose@lumen.com>
Cc: Prabakaran, Sharmila (UTC) <sharmila.prabakaran@utc.wa.gov>
Subject: FW: Data Request Responses

Hi Peter,

I'm following up on the emails below.

You provided a data request response to Staff on March 30.

Staff sent a follow-up email on May 8 asking for additional information. The company did not respond.

Staff sent another email on May 24 asking for a status update on the request for additional information. The company still did not respond.

The company's response to the May 8 follow-up questions is past due and there has been no communication from the company. Please provide the requested information along with an explanation of why the company has not engaged with Staff's May 8 and May 24 requests.

Thank you,

Bridgit Feeser

Assistant Director, Consumer Protection

(360) 664-1111 Office

bridgit.feeser@utc.wa.gov

www.utc.wa.gov

pronouns: she/her

Attachment H

From: Gose, Peter J
To: Feeser, Bridgit (UTC)
Cc: Prabakaran, Sharmila (UTC)
Subject: RE: Data Request Responses
Date: Wednesday, June 7, 2023 4:32:34 PM
Attachments: [image002.jpg](#)
[image005.png](#)
[image003.jpg](#)
[image006.jpg](#)

External Email

Hello Bridgit,

I received your message today and am glad you followed up. On David Namura's departure from CenturyLink I was receiving emails that would have previously come to him. I wrote a rule to put those into a separate email subfolder and Sharmila's email address was included in that rule and I simply missed her messages. I have reached out to get the supplemental information requested and have asked for expedited responses.

I left voice mail with Sharmila indicating I need clarification on two of the questions. Specifically, I am not clear as to how "automated lines" in questions 4 and 5 would be defined. Understanding her intent will assist in supplying the information needed.

I will be in touch soon with the responses. Thank you.

Peter Gose

Director State and Local Government Affairs
14530 NW 63rd St. Parkville, MO 64152
tel: 816-759-2895 | cell: 303-324-5678
peter.gose@lumen.com

Attachment I

Call notes, June 8, 2023:

Called Peter back. Peter apologized for the delayed response as there was an error when he set the rule while sending the emails to a folder. He said he'll send the data information requested asap. Also, he wanted to clarify the question 4 & 5, as in how many automated lines are there for the company for repair center and Business call center? I explained that we need to know how the calls were directed and how many lines are there for each center for the company?

Peter said that there is one 1-800 number for each center nationwide. But the IVR decides which call should be directed to where. For eg, if the number has a 360 area code then it will identify as Washington State and will direct as appropriate. Peter said he'll also, sending the email in detail along with the data requested. He mentioned that he has requested an expedite service from his team to provide the information. Once received he affirmed, he'll send them through. Finally, with no further question we ended the call.

Attachment J

From: Prabakaran, Sharmila (UTC) <sharmila.prabakaran@utc.wa.gov>

Sent: Tuesday, September 19, 2023 5:54 PM

To: Gose, Peter J <Peter.Gose@lumen.com>

Cc: Feeser, Bridgit (UTC) <bridgit.feeser@utc.wa.gov>

Subject: Data Request # 3

CAUTION: This email originated outside of Lumen Technologies. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Peter,

On Dec 29, 2022, staff originally requested the following data for the period of Sept 1, 2021, through Nov 30, 2022:

1. Please provide the monthly call data for the average time until the automated system provided a caller with an option to speak to a live representative or transferred the caller to a live representative.
2. Please provide the monthly call data for the average time until a live representative answered a call from the time the caller selected the appropriate option to speak to a live representative.
3. Please provide a copy of the automated system recorded message that provides guidance for callers.
4. Please provide a copy of the automated system recorded message that provides guidance for callers.
5. For data requested in 1, 2, and 3, provide the lists in Excel spreadsheet format, identify the month and year, and indicate the type of call (repair or business office) from September 01, 2021, through November 30, 2022.

After several communications back and forth with the company, staff sent a follow up email on May 08, 2023, asking clarifying questions about data by month and year for each type of call made to a repair center and business office. Staff also requested the company to explain what measures and processes were put in place, and changes the company made since September 1, 2021, to ensure a live representative answer calls to the repair center and calls to the business office within 60 seconds.

To date, I have only received business office monthly data for period of Sept 1, 2021, through Nov 30, 22, as well as other data I did not ask for in the data request. I have not received the data requested for the repair center nor have I received the company's updated processes to ensure a live representative answer calls to the repair center and calls to the business office within 60 seconds.

Due to the lack of providing the repair center data and the length of time this data request has been open, I am revising the timeframe for information that I am requesting. Please submit the

following data for the timeframe of Jan. 1, 2022, through Aug. 31, 2023.

- Please provide the monthly call data for the average time until the automated system provided a caller with an option to speak to a live representative or transferred the caller to a live representative for all the calls made to a repair center.
- Please provide the monthly call data for the average time until the automated system provided a caller with an option to speak to a live representative or transferred the caller to a live representative for all the calls made to a business office.

Please explain what measures and processes were put in place, and changes the company made since September 1, 2021, to ensure a live representative answers calls to the repair office and calls to the business office within 60 seconds.

Please provide the requested data for each in an Excel document, by each month for the period of Jan. 1, 2022, through Aug. 31, 2023. Your response is due on September 26, 2023.

Thank you,

Sharmila Prabakaran

(Pronouns: She/Her/Hers)

Investigator, Consumer Protection and Communications

sharmila.prabakaran@utc.wa.gov

Office: (360) 664-1129

Attachment K

From: Gose, Peter J <Peter.Gose@lumen.com>
Sent: Tuesday, September 19, 2023 4:24 PM
To: Prabakaran, Sharmila (UTC) <sharmila.prabakaran@utc.wa.gov>
Cc: Feeser, Bridgit (UTC) <bridgit.feeser@utc.wa.gov>
Subject: RE: Data Request # 3

External Email

Hello Sharmila,

I am out of the office the latter part of this week. I am requesting an extension until Wednesday, October 4, 2023, in order to coordinate the assemble of the information requested.

Thank you.

Peter Gose

Director State and Local Government Affairs
14530 NW 63rd St. Parkville, MO 64152
tel: 816-759-2895 | cell: 303-324-5678
peter.gose@lumen.com

Attachment L

From: Prabakaran, Sharmila (UTC)
To: Gose, Peter J
Cc: Feeser, Bridgit (UTC)
Subject: RE: Data Request # 3
Date: Thursday, September 21, 2023 4:35:00 PM
Attachments: image003.png
image004.jpg
image001.jpg

Hi Peter,

Staff will grant an extension to Oct. 4 only for the additional data that was requested for the timeframe of December 01, 2022, through August 30, 2023.

- Please provide the monthly call data for the average time until the automated system provided a caller with an option to speak to a live representative or transferred the caller to a live representative for all the calls made to a repair center.
- Please provide the monthly call data for the average time until the automated system provided a caller with an option to speak to a live representative or transferred the caller to a live representative for all the calls made to a business office.

Staff does not grant an extension for the same data that was requested on Dec. 29, 2022, for the timeframe of Sept 1, 2021, through Nov 30, 2022. The company provided the data requested for the business office for this timeframe, but the company still has not provided the data for the repair center.

- Please provide the monthly call data for the average time until the automated system provided a caller with an option to speak to a live representative or transferred the caller to a live representative for all the calls made to a repair center.
- Please provide the monthly call data for the average time until the automated system provided a caller with an option to speak to a live representative or transferred the caller to a live representative for all the calls made to a business office.

Staff further does not grant an extension for the following, as this request for information was sent to the company on May 8, 2023.

Please explain what measures and processes were put in place, and changes the company made since September 1, 2021, to ensure a live representative answers calls to the repair office and calls to the business office within 60 seconds.

Let me know if you have any questions.

Thank you,

Sharmila Prabakaran

(Pronouns: She/Her/Hers)

Investigator, Consumer Protection and Communications

Attachment M

From: Gose, Peter J
To: Prabakaran, Sharmila (UTC)
Cc: Feeser, Bridgit (UTC)
Subject: RE: Data Request # 3
Date: Wednesday, October 4, 2023 2:36:42 PM
Attachments: [image002.jpg](#)
[image005.png](#)
[image001.jpg](#)
[image003.jpg](#)
[WUTC Staff KPI DR Workpapers 10-04-23.xlsx](#)

External Email

Hello Sharmila,

Please see attached CenturyLink's response to your follow-up requests. If you would like to hold a call with the subject matter experts from the company's call center group, I would be happy to arrange and host a call.

Thank you.

Peter Gose

Director State and Local Government Affairs
14530 NW 63rd St. Parkville, MO 64152
tel: 816-759-2895 | cell: 303-324-5678
peter.gose@lumen.com

Tab labeled "10-04-2023 Final" on Spreadsheet

CENTURYLINK RESPONSE TO WUTC STAFF DATA REQUEST

<p>1 Please provide the monthly call data for the average time until the automated system provided a caller with an option to speak to a live representative or transferred the caller to a live representative for all the calls made to a repair center and business office for the timeframe of December 01, 2022, through August 30, 2023.</p>	<p>1. 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. 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>
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Information supplied by Ari Klots

<p>2 Please provide the monthly call data for the average time until the automated system provided a caller with an option to speak to a live representative or transferred the caller to a live representative for all the calls made to a repair center and business office for the time frame of of September 1, 2021, through November 30, 2022</p>	<p>2. See response to question 1 above.</p>
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Information supplied by Ari Klots

<p>3 Please explain what measures and processes were put in place, and changes the company made since September 1, 2021, to ensure a live representative answers calls to the repair office and calls to the business office within 60 seconds.</p>	<p>3. Overall (including all Washington customer types), CTL's speed of answer has improved based upon system upgrades, including transitioning to a new routing platform and rolling out the ability to segment and prioritize calls.</p>
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Information supplied by Ari Klots

<p>4 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.</p>	<p>4. Peter Gose, Director State and Local Government Affairs, 816-759-2895, peter.gose@lumen.com</p>
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Tab labeled "03-30-2023" on Spreadsheet

CENTURYLINK RESPONSE TO WUTC STAFF DATA REQUEST

<p>1 Please provide the monthly call data for the average time until the automated system answered calls.</p>	<p>1. There is no gap or 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. 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 as described mor fully in response to data request number 2.</p>
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<p>2 Please provide the monthly call data for the average time until the automated system provided a caller with an option to speak to a live representative, or transferred the caller to a live representative.</p>	<p>2. 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. 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>
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Information supplied by Fred Bak

<p>3 Please provide the monthly call data for the average time until a live representative answered a call from the time the caller selected the appropriate option to speak to a live representative.</p>	<p>3. See response below. Times are presented in seconds. In January 2022 CenturyLink migrated platforms utilized in the provision of customer care opearitions. Due to a migration to a new customer care provisioning system, the information presented below is that which is readily available.</p>
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	9/1/2021	10/1/2021	11/1/2021	12/1/2021	1/1/2022	2/1/2022	3/1/2022	4/1/2022	5/1/2022	6/1/2022	7/1/2022	8/1/2022	9/1/2022	10/1/2022	11/1/2022
WA Wireline Service - Residence and Small Business - Business Office/Care								15	17	13	9	10	5	25	11
WA Internet / Broadband - Business Office/Care	172	183	164	110	202	147	142	86	253	291	274	216	146	186	116
Total WA					202	147	142	83	185	194	185	152	102	131	82

Information supplied by Ari Klots

<p>4 Please provide a copy of the automated system recorded message that provides guidance for callers.</p>	<p>4. When calling 800-241-1111 a customer enters the automated IVR system and they receive a welcome to CenturyLink message and an option for Spanish assistance. For English callers the automated IVR system looks at the phone numer 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 customers with a Washington number who respond affirmatively, the IVR immediately announces "You have the option to speak to a representative during your call by saying "Request Representative." 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." Throughout the IVR experience, there are myriad branches and options that provide guidance for callers. That set forth above specifically pertains to options at the front end of the process to expeditiously put a customer in touch with a live representative. This IVR system can be monitored by calling 800-244-1111.</p>
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<p>5 For data requested in 1, 2, and 3, provide the lists in Excel spreadsheet format, identify the month and year, and indicate the type of call (repair or business office) from September 01, 2021, through November 30, 2022.</p>	<p>5. See responses to items 1, 2 and 3 above.</p>
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<p>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.</p>	<p>6. Peter Gose, Director State and Local Government Affairs, 816-759-2895, peter.gose@lumen.com</p>
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10-04-2023 Final

10-04-2023 Initial

03-30-2023

12-29-2022

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Tab labeled "12-29-2023" on Spreadsheet

CENTURYLINK RESPONSE TO WUTC STAFF DATA REQUEST: 12-29-2022

1. Please provide the monthly call data for the average time until the automated system answered calls.	1. There is no gap or 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. 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 as described mor fully in response to data request number 2.
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2. Please provide the monthly call data for the average time until the automated system provided a caller with an option to speak to a live representative, or transferred the caller to a live representative.	2. 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. Presented below are the monthly call volumes from January 2022 to November 2022. In January 2022 CenturyLink migrated platforms utilized in the provision of customer care opeartions. Due to a migration to a new customer care provisioning system, the information presented below is that which is readily available.
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	9/1/2021	10/1/2021	11/1/2021	12/1/2021	1/1/2022	2/1/2022	3/1/2022	4/1/2022	5/1/2022	6/1/2022	7/1/2022	8/1/2022	9/1/2022	10/1/2022	11/1/2022
WA caller calling from their washington ANI					45,835	37,159	43,590	44,024	52,059	53,643	52,422	55,315	50,926	50,232	47,639
WA Caller that entered a WA TN different from ANI					4,788	4,047	4,364	8,565	13,761	15,168	14,933	15,961	13,570	12,333	9,428
Caller that didn't know account or TN but identified as being from WA					341	288	282	464	830	770	669	699	621	556	401
Total Washington callers hearing the request representative option					50,964	41,494	48,236	53,053	66,650	69,581	68,024	71,975	65,117	63,121	57,468

Information supplied by Fred Bak

3. Please provide the monthly call data for the average time until a live representative answered a call from the time the caller selected the appropriate option to speak to a live representative.	3. See response below. Times are presented in seconds. In January 2022 CenturyLink migrated platforms utilized in the provision of customer care opeartions. Due to a migration to a new customer care provisioning system, the information presented below is that which is readily available.
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	9/1/2021	10/1/2021	11/1/2021	12/1/2021	1/1/2022	2/1/2022	3/1/2022	4/1/2022	5/1/2022	6/1/2022	7/1/2022	8/1/2022	9/1/2022	10/1/2022	11/1/2022
WA Wireline Service - Residence and Small Business - Business Office/Care								15	17	13	9	10	5	25	11
WA Internet / Broadband - Business Office/Care								86	253	291	274	216	146	186	116
Total WA					202	147	142	83	185	194	185	152	102	131	82

Information supplied by Ari Klots

4. Please provide a copy of the automated system recorded message that provides guidance for callers.	4. When calling 800-241-1111 a customer enters the automated IVR system and they receive a welcome to CenturyLink 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 customers with a Washington number who respond affirmatively, the IVR immediately announces "You have the option to speak to a representative during your call by saying "Request Representative." 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." Throughout the IVR experience, there are myriad branches and options that provide guidance for callers. That set forth above specifically pertains to options at the front end of the process to expeditiously put a customer in touch with a live representative. This IVR system can be monitored by calling 800-244-1111.
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5. For data requested in 1, 2, and 3, provide the lists in Excel spreadsheet format, identify the month and year, and indicate the type of call (repair or business office) from September 01, 2021, through November 30, 2022.	5. See responses to items 1, 2 and 3 above.
---	---

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
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Attachment N

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

sharmila.prabakaran@utc.wa.gov

Office: (360) 664-1129

Attachment O

From: Weiland, Liam (ATG) <liam.weiland@atg.wa.gov>
Sent: Thursday, February 8, 2024 5:33 PM
To: Sherr, Adam <Adam.Sherr@lumen.com>
Subject: WUTC DRs

CAUTION: This email originated outside of Lumen Technologies. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Good evening Adam,

I am reaching out with regard to a series of data requests sent by WUTC staff member Sharmila Prabakaran to Peter Gose and Dave Namura over the past year. These DRs pertain to Lumen's response times for customer calls per WAC 480-120-133. Despite granting several extensions for Lumen's response to these DRs, Staff still has not received complete data for all requested months. I believe Staff sent its final request to Peter Gose on October 26, 2023.

I am making one last request for the missing data before proceeding with filing a complaint or motion to compel. **Please provide a complete response to the data request sent on October 26, 2023 by close of business Friday, February 16, 2024.**

I will be out of office tomorrow, but please do not hesitate to reach out next week if you have any questions.

Best,
Liam

Liam Weiland
Office of the Attorney General
Utilities and Transportation Division
P.O. Box 40128 Olympia, WA 98504-0128
(360) 972-5050
liam.weiland@atg.wa.gov

Attachment P

From: Gose, Peter J <Peter.Gose@lumen.com>

Sent: Thursday, February 15, 2024 2:54 PM

To: Weiland, Liam (ATG) <liam.weiland@atg.wa.gov>; Sherr, Adam <Adam.Sherr@lumen.com>

Subject: RE: WUTC DRs

[EXTERNAL]

Liam,

Thanks for reaching out regarding these data requests. Please find attached the responses to the questions. If you or the Commission Staff have questions, please reach out to Adam or me any time.

Peter Gose

Director State and Local Government Affairs

14530 NW 63rd St. Parkville, MO 64152

tel: 816-759-2895 | cell: 303-324-5678

peter.gose@lumen.com

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 them 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>																										
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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															
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<p>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.</p>	<p>5. See response below. Times are presented in seconds.</p>																										
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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															
8	13	14	16	11	16	14	10	14	8	10	7	7															

<p>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.</p>	<p>6. Peter Gose, Director State and Local Government Affairs, 816-759-2895, peter.gose@lumen.com</p>
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