

EXHIBIT G

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION STAFF RESPONSES TO DATA REQUESTS

CONFIDENTIAL PER PROTECTIVE ORDER

GENERAL OBJECTIONS

Staff incorporates the following general objections into each and every data request response below:

1. Staff objects to these data requests to the extent that they improperly seek and/or call for the disclosure of: (a) Staff counsel's legal analysis, legal conclusions, and/or mental impressions; (b) documents and/or information protected by the attorney-client privilege and/or any other applicable privilege; and/or (c) protected work product.
2. Staff objects to any data request, instruction, or anything else purporting to require more of Staff than is required by the applicable rules and orders of the Commission.
3. Staff objects generally to any data request to the extent that: (a) the information requested is known to CenturyLink Communications, LLC (CenturyLink or Company) or its counsel; (b) the request requires disclosure of information, documents, writings, records, or publications in the public domain; and/or (c) the information requested is equally available to CenturyLink or its counsel from sources other than Staff.
4. Staff objects to these data requests to the extent that they are overly broad, unduly burdensome, and calling for information that is irrelevant or not proportional to the needs of the case.
5. These responses are provided on the basis of the best information currently available to Staff after a diligent effort to gather such information within its possession, custody or control. Staff reserves the right to amend its responses as new information is gathered. Staff is in the process of issuing, reviewing, and analyzing the ongoing investigation and discovery in this matter.

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DATE PREPARED: September 22, 2022
DOCKET: UT-181051
REQUESTER: CenturyLink

WITNESS: Commission Staff
RESPONDER: Commission Staff

CENTURYLINK DATA REQUEST NO. 28:

Mr. Akl and Mr. Webber assert that the “primary and avoidable cause” of the December 2018 outage was CLC’s failure to disable the IGCC. Admit or deny the following. For each subpart that Staff fails to admit, fully explain your answer and identify and produce all documents that support your answer.

- a. Few, if any, of the 911 calls intended for Comtech PSAPs on December 27-28, 2018 would have failed notwithstanding the Infinera green network event IF Comtech had deployed two of its four SS7 links (supporting the inter-tandem trunk connecting ESInet1 and ESInet2) via CLC’s Infinera green network and the other two via **transport circuits on Comtech’s own network.**
- b. Few, if any, of the 911 calls intended for Comtech PSAPs on December 27-28, 2018 would have failed notwithstanding the Infinera green network event IF Comtech had deployed two of its four SS7 links (supporting the inter-tandem trunk connecting ESInet1 and ESInet2) via CLC’s Infinera green network and the other two via **transport circuits on an AT&T network.**
- c. Few, if any, of the 911 calls intended for Comtech PSAPs on December 27-28, 2018 would have failed notwithstanding the Infinera green network event IF Comtech had deployed two of its four SS7 links (supporting the inter-tandem trunk connecting ESInet1 and ESInet2) via CLC’s Infinera green network and the other two via **transport circuits on another of CenturyLink/Lumen’s stand-alone optical networks.**
- d. Few, if any, of the 911 calls intended for Comtech PSAPs on December 27-28, 2018 would have failed notwithstanding the Infinera green network event IF Comtech had deployed two of its four SS7 links (supporting the inter-tandem trunk connecting ESInet1 and ESInet2) via CLC’s Infinera green network and the other two [REDACTED]. (see Exhibit SH-12C, pp. 8/92 – 10/92)

RESPONSE:

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) not in Staff’s possession, custody, or control; (b) already in the Company’s possession, custody, or control; (c) publicly available; and/or (d) obtainable from some other source that is more convenient, less burdensome, or less expensive. Staff further objects to this request to the extent it requests more than is required by the Commission’s rules and orders. Staff further objects that this request would improperly require the creation of new data and/or documents

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on the part of Staff. *See* WAC 480-07-400(1)(c)(iii). Staff further objects to the data request to the extent that the Company is asserting/assuming the existence of facts. Staff further objects to this request to the extent it seeks speculative and/or hypothetical information. Staff further objects to this request to the extent that it is beyond the scope of Dr. Akl's and Witness Webber's testimonies.

Without waving the above objections, Staff responds as follows:

The opinions of Dr. Akl and Witness Webber relevant to this case are supplied in their respective testimonies.

SUPPLEMENTAL RESPONSE

Without waiving the above objections, Staff supplements its response as follows:

Staff denies each of the requests for admission numbered 28.a, 28.b, 28.c, and 28.d. The alleged facts Staff are asked to admit are speculative and counterfactual. *See* Cross Answering Testimony of James Webber, 6:1-15:10; Response Testimony of Steven E. Turner, 25 n. 17.

CENTURYLINK DATA REQUEST NO. 33:

Provide Mr. Akl's entire file regarding any aspect of Docket UT-181051, including but not limited to workpapers, emails and engagement letter.

RESPONSE:

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 to the extent that this request is duplicative of CLC DRs 10 and 11 to Staff. Staff further objects to this request to the extent it requests more than is required by the Commission's rules and orders. Staff further objects to this data request to the extent that the information it seeks is protected by attorney client privilege and/or the work product doctrine.

Without waving the above objections, Staff responds as follows:

Please see attached materials responsive to this request. *See also*, Staff Response to CLC DR 11.

SUPPLEMENTAL RESPONSE

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Without waiving the above objections, Staff supplements its response as follows:

Please see attached materials responsive to this request, numbered 002033-002340. A privilege log is included.