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*For CenturyLink*

**BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH**

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Formal Complaint of John W. Holt and Karen  
Holt Bennion against CenturyLink

**DOCKET NO. 21-049-09**

**CENTURYLINK'S RESPONSE TO  
ORDER OF DEFAULT, MOTION TO  
VACATE AND MOTION TO DISMISS A**

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Qwest Corporation d/b/a CenturyLink QC hereby responds to the Public Service Commission of Utah's ("Commission") November 12, 2021 Order of Default and states as follows:

1. CenturyLink prepared a response to the Commission's November 4, 2021 Order to Show Cause to inform the Commission the Formal Complaint had been fully resolved. Unfortunately, CenturyLink's Response to the Show Cause Order was not filed in the record due to administrative error. CenturyLink apologizes for this miscommunication and responds herein fully and in good faith to the Commission's November 12, 2021, Order of Default.

2. With respect to the required correction plan indicating CenturyLink's findings and reasons for the noise and static heard from Complainants' telephone, CenturyLink's correction plan is now fully implemented. On September 8, 2021, CenturyLink received a repair ticket for the Holts' home line. On September 9, 2021, CenturyLink's cable technicians began work to isolate the trouble and found a bad section of cable that required excavation to repair, and CenturyLink's contractor began excavation of the buried cable. From September 9, 2021 through

October 7, 2021, CenturyLink's contractor continued work, and CenturyLink assigned one to two technicians to the Holts project to review progress, isolate trouble, and develop restoration plans. CenturyLink technician(s) were present on the repair site on September 9<sup>th</sup>, September 10<sup>th</sup>, September 13<sup>th</sup>, September 17<sup>th</sup>, September 20<sup>th</sup>, September 21<sup>st</sup>, September 23<sup>rd</sup>, September 24<sup>th</sup>, September 27<sup>th</sup>, September 28<sup>th</sup>, September 29<sup>th</sup>, September 30<sup>th</sup>, October 1<sup>st</sup>, October 4<sup>th</sup>, and October 7<sup>th</sup>. During this process, a CenturyLink employee spoke with Mr. Holts' son at minimum three times per week to keep the customer updated on efforts and progress.

CenturyLink found the reasons for the noise and static heard from Complainants' telephone was a section of malfunctioning cable. The repair duration was due in part to difficulty locating the exact area of malfunction. The contractor had to hand dig due to obstacles over a period of three days, three different pits to expose an old, buried case to resolve the problem. The defective cable section was bypassed by replacing 50 feet of cable. CenturyLink's technicians spent approximately 40 hours on this repair with an estimated internal labor cost of \$4,200. CenturyLink's contractors spent approximately 12 days working on this repair, and the cost for contract labor/materials was approximately \$5,000. On October 8, 2021, the cable issue was resolved, and the Holts' service was fully restored. CenturyLink has not had any subsequent trouble tickets on the Holts' home phone since the restoral was completed.

On October 28, 2021, CenturyLink filed a Status Update with the Commission, pursuant to Commission request, informing the Commission that service had been restored to Complainants' line, resolving the Formal Complaint. However, following service restoration, Complainants reported that incoming callers heard an automated recording. Complainants have since confirmed to CenturyLink that all issues are resolved. In addition to their service being restored, there is no automated recording on Complainants' line. CenturyLink's programing

department further confirmed there were no call forward options associated with Complainants' account that could result in an automated recording.

3. With respect to the required schedule indicating the dates when reasonable and appropriate telephone service will be restored, Service was restored on October 8, 2021. For additional details regarding the repair schedule of events, please see the dates provided in paragraph 2 above.

4. With respect to the required plan to ensure reasonable and appropriate telephone service continues, CenturyLink has completed a thorough and detailed repair of the Holts' line. In an effort to ensure the Holts will continue to have access to appropriate telephone services, CenturyLink has replaced 50 feet of cable at a cost to CenturyLink of nearly \$10,000.

5. With respect to the required contact information of a Salt Lake City employee who is responsible for operations that will keep Complainants informed of the progress made to fix their problems, Sherri Williams is CenturyLink's Manager of Regional Field Operations assigned to the Holts' service area. Ms. Williams may be reached at (801) 205-6802.

6. With respect to the required refund of 12 months of Complainants' telephone charges including taxes and fees billed from, and including, September 2020 through August 2021, the Holts' service is billed at \$74.20 per month. Therefore, a credit of for 12 months of \$890.40 was applied to the Holts' account on November 15, 2021. The credit may take one to two billing cycles before it is reflected on the customers' bill. In addition, a credit of \$60 was also applied to the Holts' account in September.

## MOTION

Based on the foregoing, and good cause appearing therefor, CenturyLink moves the Commission to vacate the Order of Default issued November 12, 2021, and to dismiss the Complaint filed September 17, 2021.

RESPECTFULLY SUBMITTED this 23rd day of November 2021.

/s/Stephen F. Mecham  
Stephen F. Mecham

**CERTIFICATE OF SERVICE**

I CERTIFY that on November 23, 2021, a true and correct copy of the foregoing was served by electronic mail upon the following:

***Complainants***

John W. Holt and Karen Holt Bennion (dbkbl982@msn.com)

***CenturyLink***

Tressa Carter (tressa.carter@centurylink.com)

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/s/Stephen F. Mecham

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