

May 1, 2025

*Via Email:*  
*psc@utah.gov*

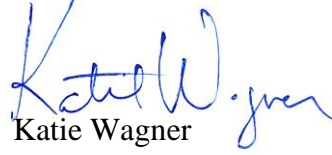
Gary Widerburg  
Commission Administrator  
Utah Public Service Commission  
Heber M. Wells Building, 4<sup>th</sup> Floor  
160 East 300 South  
Salt Lake City, UT 84111

**RE: Docket No. 25-049-01  
CenturyLink's Answer to Complaint**

Dear Mr. Widerburg:

Attached for filing is CenturyLink's Answer and Affirmative Defenses to Formal  
Complaint of Cathie Chansamone Costanzo.

Sincerely,

  
Katie Wagner  
Senior Corporate Counsel

Attachment

**BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH**

<b>FORMAL COMPLAINT OF CATHIE</b>	)	
<b>CHANSAMONE COSTANZO AGAINST</b>	)	<b>DOCKET No. 25-049-01</b>
<b>CENTURYLINK</b>	)	
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**CENTURYLINK’S ANSWER AND  
AFFIRMATIVE DEFENSES TO FORMAL COMPLAINT**

COMES NOW, Respondent Qwest Corporation dba CenturyLink (“CenturyLink”), by and through its undersigned counsel and submits its Answer and Affirmative Defenses to the above-captioned Formal Complaint (“Complaint”) of Cathie Chansamone Costanzo as follows:

1. On April 4, 2025, the Utah Public Service Commission entered a Notice of Filing and Comment Period requiring that CenturyLink respond by May 5, 2025, to the following inquiries:

a. Complainant alleges that her phone service was dead, that the phone experienced static when a technician visited, and that the phone went dead again.

2. CenturyLink denies each and every allegation in the Complaint except for those which constitute admissions against the interest of the Complainant.

3. Notwithstanding this, CenturyLink desires to satisfy the Complaint. In so doing, CenturyLink nonetheless denies liability and does not admit the veracity of any claim.

4. With respect to Complainant’s repair process, technicians have been dispatched on multiple occasions to attend to Complainant’s service. Final repairs were completed by CenturyLink’s technicians on April 5, 2025. On April 7, 2025, CenturyLink contacted Complainant and confirmed that her service was restored. CenturyLink has received no further communications from Complainant after April 7, 2025.

5. With respect to Complainant's bill, to date Complainant has been issued a credit against her bill totaling \$101.75 composed of credits for all time alleged out of service and credits for alleged missed repair appointments.

6. Upon information and belief, because Complainant service is restored and Complainant and has been compensated for reports of past outages, this Complaint is satisfied in whole, and no further action is needed.

**AFFIRMATIVE DEFENSES TO COMPLAINT**

7. The Complaint lacks subject-matter jurisdiction to the extent any alleged outage relates to internet-based services.

8. Complainant has failed to mitigate its damages, if any.

9. CenturyLink affirmatively alleges that the Complaint fails to identify any violation of applicable laws, rules, regulations, or prior orders of the Commission.

10. CenturyLink reserves the right to assert any additional affirmative defenses that may later become relevant.

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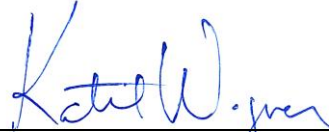
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WHEREFORE, having fully answered, CenturyLink prays that the Complaint of Cathie Chansamone Costanzo be wholly dismissed with prejudice and for such further relief as the Commission deems just and equitable.

Dated this 1<sup>st</sup> day of May, 2025

Respectfully submitted,



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Katie N. Wagner, OK Bar #33296  
Senior Corporate Counsel  
CenturyLink  
(405) 669-8712  
[katie.wagner@lumen.com](mailto:katie.wagner@lumen.com)  
Attorneys for Qwest Corporation dba  
CenturyLink

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing, ***CENTURYLINK'S ANSWER and AFFIRMATIVE DEFENSES TO FORMAL COMPLAINT***, was sent via Email to the following parties on the date indicated below:

**Complainant**

Cathie Chansamone Costanzo ..... [ccjd64@gmail.com](mailto:ccjd64@gmail.com)

**Utah Assistant Attorneys General**

Patricia Schmid ..... [pschmid@agutah.gov](mailto:pschmid@agutah.gov)

Patrick Grecu ..... [pgrecu@agutah.gov](mailto:pgrecu@agutah.gov)

Robert Moore ..... [rmoore@agutah.gov](mailto:rmoore@agutah.gov)

**Division of Public Utilities**

Madison Galt ..... [mgalt@utah.gov](mailto:mgalt@utah.gov)

**Office of Consumer Services .....**

..... [ocs@utah.gov](mailto:ocs@utah.gov)  
[akanderson@utah.gov](mailto:akanderson@utah.gov)

Alyson Anderson ..... [bvastag@utah.gov](mailto:bvastag@utah.gov)

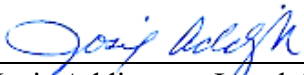
Bella Vastag ..... [aware@utah.gov](mailto:aware@utah.gov)

Alex Ware ..... [jzachary@utah.gov](mailto:jzachary@utah.gov)

Jacob Zachary .....

DATED this 1<sup>st</sup> day of May 2025.

**CENTURYLINK**

By:   
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Josie Addington, Legal Assistant