

October 27, 2025

Via Email:
psc@utah.gov


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

**RE: Docket No. 25-049-03
CenturyLink's Answer to Complaint**

Dear Mr. Widerburg:

Attached for filing is CenturyLink's Answer and Affirmative Defenses to Formal
Complaint of James Quast.

Sincerely,



Katie Wagner
Senior Corporate Counsel

Attachment

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

FORMAL COMPLAINT OF JAMES QUAST)
AGAINST CENTURYLINK) DOCKET No. 25-049-03
_____))
_____)

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 James Quast as follows:

1. On September 26, 2025, the Utah Public Service Commission entered a Notice of Filing and Comment Period requiring that CenturyLink respond by October 27, 2025, to the following inquiries:

- a. Provide immediate repairs to restore reliable telephone service;
- b. Offer means or reporting outages; and
- c. Demonstrate compliance with obligation to provide telephone service.

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 allegations of an outage, on September 30, 2025, CenturyLink’s customer advocacy group spoke to Complainant and confirmed that the service was restored and functioning. As such, CenturyLink is in compliance with its obligation to provide telecommunication service.

5. With respect to Complainant's bill, Complainant was given a total credit of \$256.91.

6. As with all customers experiencing an outage, Complainant is able to report an outage by contacting existing customer account and tech support.

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

AFFIRMATIVE DEFENSES TO COMPLAINT

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

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

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

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

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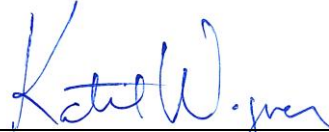
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WHEREFORE, having fully answered, CenturyLink prays that the Complaint of James Quast dismissed with prejudice and for such further relief as the Commission deems just and equitable.

Dated this 27th day of October, 2025

Respectfully submitted,



Katie N. Wagner, OK Bar #33296
Senior Corporate Counsel
CenturyLink
(405) 669-8712
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

James Quast..... Starquast2rv@gmail.com

Utah Assistant Attorneys General

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Jennifer Ntiamoah jntiamoah@utah.gov

DATED this 27th day of October 2025.

CENTURYLINK

By: 

Josie Addington, Legal Assistant