

<sup>2</sup> *Id.*

Harris County Flood Control District estimated that 70% of Harris County was flooded by at least 1.5 feet of water as a result of approximately 1 trillion gallons of rain that fell in the county during the storm.<sup>3</sup> More than 50 inches of rain fell in parts of Texas.<sup>4</sup> President Trump issued a major disaster declaration that allowed numerous federal agencies to support the response effort.<sup>5</sup> Nearly 780,000 people evacuated their homes, 250,000 were without power, and at least 82 people lost their lives as a result of the storm.<sup>6</sup> Hurricane Harvey is estimated to have caused over \$180 billion in damage, which is more than any other storm in U.S. history except for the highest damage estimates stemming from Hurricane Katrina.<sup>7</sup>

## **II. INFORMATION REQUIRED PURSUANT TO SECTION 63.63(a)**

### **A. Effective Date of Impairment and Service Areas Affected**

CenturyLink first started experiencing flood-related service outages on approximately August 25, 2017. As of this filing, CenturyLink has yet to restore service in limited portions of the Kingwood wire center. Approximately 50 customers in the Barrington community, a suburb of Houston, are affected.

### **B. Nature and Estimated Duration of the Conditions Causing the Impairment**

Many Texas communities are not yet fully repaired and rebuilt from the damage caused by Hurricane Harvey. CenturyLink's remote office that serves this area had five feet of water in

---

<sup>3</sup> *Id.*

<sup>4</sup> <https://www.wsj.com/articles/evacuees-crowd-into-shelters-as-harvey-hits-louisiana-1504190720> (last visited Nov. 21, 2017).

<sup>5</sup> *See, e.g.,* <https://www.fema.gov/news-release/2017/09/22/historic-disaster-response-hurricane-harvey-texas> (last visited Nov. 21, 2017).

<sup>6</sup> *See, e.g.,* <https://www.thebalance.com/hurricane-harvey-facts-damage-costs-4150087> (last visited Nov. 21, 2017).

<sup>7</sup> *Id.*

it as a result of the storm. It took approximately two weeks for the flood waters to recede. Commercial power was only very recently restored to CenturyLink's remote office site, on approximately November 17, 2017.

**C. Facts Showing That Such Conditions Could Not Have Been Reasonably Foreseen to Prevent Such Impairment**

Southeastern Texas experienced unprecedented amounts of rainfall which caused severe flooding and other widespread damage that wiped out critical infrastructure that will take months to repair. The Houston area where Barrington is located experienced the largest amount of rainwater ever recorded in the continental United States by a single storm.<sup>8</sup> The flooding and resulting impairment of CenturyLink's services from this epic and unprecedented event was not foreseeable and could not have been reasonably prevented.

**D. A Description of the Service Involved**

CenturyLink's wireline telecommunications services and other real-time two-way voice communications services, as defined in Section 63.60(f) of the Commission's Rules, have been impaired in Texas by Hurricane Harvey.

**E. The Nature of Service Which Will Be Available or Substituted**

CenturyLink is planning to fully restore wireline telecommunications services that were impaired by the hurricane. Temporary service from CenturyLink is not available in the affected area, but wireless service is available. As part of its service restoration efforts, CenturyLink is replacing equipment to enable higher broadband speeds in the area than were previously available.

---

<sup>8</sup> See, e.g., <https://www.fema.gov/news-release/2017/09/22/historic-disaster-response-hurricane-harvey-texas>. (last visited Nov. 21, 2017).

**F. The Effect Upon Rates to any Person in the Community**

CenturyLink does not foresee this impairment having any immediate impact on the rates CenturyLink charges its customers. CenturyLink intends to fully restore its wireline telecommunications services and make them available at the same rates that applied prior to the flooding.

**G. Restoration Efforts**

CenturyLink has devoted an enormous number of man-hours to restoring service that was impaired by the flooding. CenturyLink will continue to work diligently to rebuild its network and restore service to affected customers as the region seeks to recover from this disaster. CenturyLink notes that the timing of service restoration is likely to depend on the availability of commercial power. CenturyLink will continue to coordinate with other infrastructure providers as restoration efforts remain ongoing, but at this time expects that service will be restored by the end of 2017.

**III. CONCLUSION**

For the foregoing reasons, in light of the devastating flooding and catastrophic damage suffered in Texas as a result of Hurricane Harvey, CenturyLink respectfully requests Commission approval of this Application.

Respectfully submitted,

**Central Telephone Company of Texas  
d/b/a CenturyLink**

By: /s/ Jeanne W. Stockman  
Jeanne W. Stockman  
CenturyLink  
14111 Capital Boulevard  
Wake Forest, N.C. 27587  
919-554-7621  
[Jeanne.w.stockman@centurylink.com](mailto:Jeanne.w.stockman@centurylink.com)

Dated: November 22, 2017

Its Attorney