

## **OAG EXHIBIT B**

### **CWA RESPONSES TO OAG IRs**

**CWA Response to  
OAG IR No. 003, Attachment D  
Has Been Redacted In Its Entirety**

**CWA Response to OAG No. 011:** *“For each photograph contained in Attachments 1-3 to CWA’s initial complaint filed on April 23, 2020, please provide the following information: (a) the name and contact information for the photographer; (b) the date of photograph; (c) the location of the photograph; (d) whether CWA contends the physical plant depicted in each photograph is currently in the same, worse or better condition; and (e) all other photographs not included in such attachments that corroborate CWA’s statement referred to in Information Request 10.”*

The specific answers to b) and c) (date and location) in this section could be correlated by the Company and potentially used to identify the photographer and therefore potentially subject them to retaliatory action. For this reason, only the photos taken by non-CenturyLink employees, will have precise dates.

a) Jeff Lacher, CWA Staff Representative, 716-491-2839, [jlacher@cwa-union.org](mailto:jlacher@cwa-union.org); Technician A, Technician B; Technician C.

b)	October 2019	c)	2010 Silver Lake Rd., New Brighton
	November 2019		1975 Long Lake Rd., New Brighton
	November 2019		1748 Long Lake Rd., New Brighton
	November 2019		1355 Long Lake Rd., New Brighton
	January 2020		Mount Airy 1 (GPS: Lat. 44;57;33.74, Long. 93;5;37.61)
	January 2020		Mount Airy 2 (GPS: Lat. 44;57;34.72, Long. 93;5;37.03)
	January 2020		Mount Airy 3 (GPS: Lat. 44;57;34.99, Long. 93;5;49.12)
	January 2020		Mount Airy 4 (GPS: Lat. 44;57;35.69, Long. 93;5;43.76)
	January 2020		Mount Airy 5 (GPS: Lat. 44;57;35.75; Long. 93;5;43.68)
	October 21, 2019		Intersection of S. Owasso and Rice, Little Canada
	October 2019		966 McKnight Rd, S, Maplewood

d) To answer part d) of this question, CWA returned to the locations of the initial photographs, some taken almost a year ago. New photos were taken in October 2020 (**Attachment P**). As is apparent from these photos, all but one example of the equipment remains unrepaired and in similar or worse condition.

e) *See Attachment P.*

**Response by:** Jeff S. Lacher  
**Title:** CWA Staff Representative, District 7  
**Department:** District 7  
**Telephone:** 716-491-2839

**CWA Response to OAG No. 014:** *“For each photograph contained in Exhibit B to CWA’s formal complaint filed on August 18, 2020, please provide the following information: (a) the name and contact information for the photographer; (b) the date of photograph; (c) whether CWA contends the physical plant depicted in each photograph is currently in the same, worse or better condition; and (d) all other photographs not included in Exhibit B that corroborate CWA’s statement that the Company’s physical plant is deteriorating.”*

a) Jeff Lacher, CWA Staff Representative, 716-491-2839, [jlacher@cwa-union.org](mailto:jlacher@cwa-union.org); Technician A, Technician B; Technician C.

b)	July 2020	c)	141 <sup>st</sup> and Huntington
	July 2020		1241 Theodore Wirth Parkway
	July 2020		1535 Windsor La., Shakopee
	July 2020		8600 Egan Dr, Savage
	July 2020		2364 14 <sup>th</sup> St, NW, New Brighton
	July 2020		3502 Dight Ave. S, Mpls
	July 2020		7559 Egan, Savage
	July 2020		7704 4th St., Richfield
	July 2020		8106 Dakota, Chanhassan
	July 2020		8489 Moraine Cir. Shakopee
	July 2020		13031 Ottawa Dr., Savage
	July 2020		13223 Webster Ave, Savage
	July 2020		James Ave. and 139 <sup>th</sup> St. W, Burnsville
	August 2020		Burnsville (No coordinates available)
	August 2020		13428 Uptown Ave S, Burnsville
	October 21, 2019		South Owasso and Rice, Little Canada (also appears in April 22, submission)
	July 27, 2020		Intersection McAndrews Rd. and Burnhaven Dr., Burnsville
	August 4, 2020		Intersection Spiral View Loop Rd. and Hastings Rd S, Hastings
	August 5, 2020		1200 Co. Rd. 42 Burnsville

c) To answer part (d) of this question, CWA returned to the locations of the initial photographs, some taken almost a year ago. New photos were taken in October 2020 (**Attachment P**). As is apparent from these photos, all but one example of the equipment remains unrepaired and in similar or worse condition.

d) Photos not submitted with August 18 complaint (**Attachment M**).

August 14, 2020	7275 147 <sup>th</sup> W Street, Apple Valley
August 7, 2020	Intersection 147 <sup>th</sup> St. W and Garrett Ave, Apple Valley

**Response by:** Jeff S. Lacher  
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