

October 21, 2022

Via Web Portal

Ms. Amanda Maxwell
Executive Director and Secretary
Washington Utilities & Transportation Commission
621 Woodland Square Loop SE
Lacey, Washington 98503

**Re: Docket No.: UT-181051
Confidential Response Testimony of CenturyLink Communications, LLC**

Dear Ms. Maxwell:

Attached are the Confidential/Redacted Response Testimony of Jeanne W. Stockman. CenturyLink witness Stacy J. Hartman has left the company. Her response testimony (formerly EXH SJH-1TC) is being adopted by Jeanne Stockman. Revised copies of the testimony are attached as EXH JWS-1TC and EXH JWS-1TR.

Also attached is new EXH JWS-16 which summarizes Ms. Stockman's background. To preserve the pagination of the original Response Testimony, we have opted to include that information in EXH JWS-16. Please note that EXH SJH-2 through SJH-15 have not changed and are not being re-filed.

CenturyLink's Exhibit List is also included in this filing submission.

Sincerely,



Adam L. Sherr
Assistant General Counsel

ALS/jga

Enclosure(s)
cc: Service List

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,

Complainant,

v.

CENTURYLINK COMMUNICATIONS, LLC,

Respondent.

DOCKET UT-181051

RESPONSE TESTIMONY

OF

~~STACY J. HARTMAN~~

JEANNE W. STOCKMAN

ON BEHALF OF

CENTURYLINK COMMUNICATIONS, LLC

March 31, 2022

Rev. October 21, 2022

EXHIBIT 2

Issue	Staff Position	Public Counsel Position
Comtech’s failure to ensure adequate diversity for SS7 links	Staff silent	Public Counsel acknowledges failed design, but refuses to take a position on whether Staff should have pursued enforcement against Comtech
Foreseeability of Infinera network outage (Dec 2018)	Staff argues CLC should have foreseen	Public Counsel silent

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III. TRANSITION OF 911 SERVICES IN WASHINGTON

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Q. WHEN THE OUTAGE OCCURRED IN DECEMBER 2018, THE STATE OF WASHINGTON WAS TRANSITIONING FROM CENTURYLINK TO COMTECH AS THE STATE 911 SERVICE PROVIDER. CAN YOU DESCRIBE THE TRANSITION?

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A. Yes. CenturyLink (and its predecessors) had been the State’s 911 service provider for many years. The most recent agreement between CenturyLink and WMD, the state agency responsible for managing emergency calling services in Washington, dates back to 2009. In February 2016, WMD accepted proposals under Request for Proposal (“RFP”) RFP-16-GS-011 for the role of state 911 service provider. CenturyLink bid, but the contract was awarded to Comtech, effective June 24, 2016.

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EXHIBIT 2

Docket UT-181051

Response Testimony of ~~Stacy J. Hartman~~ Jeanne W. Stockman

Exhibit ~~SJJWS-1TC~~ SJHWS-1TC

March 31, 2022 (rev. October 21, 2022)

1 **Q. WERE YOU INVOLVED WITH THE TRANSITION OF 911 SERVICES FROM**
2 **CENTURYLINK TO COMTECH?**

3 **A.** I was not, but both CLC witnesses Val Lobdell and Carl Klein were directly involved.
4 Both will discuss the transition, and Ms. Lobdell in particular will refute Mr. Rosen's
5 inaccurate assertions that CenturyLink dictated the transition network design and
6 Comtech's network design.

7 **Q. WAS THE STATE 911 SYSTEM FLASH CUT OVER TO COMTECH IN 2016?**

8 **A.** No, it was not. As Ms. Lobdell describes in her Response Testimony,³⁰ CenturyLink's
9 recommendation and strong preference was for CenturyLink, once Comtech's 911 system
10 was ready for launch, to transfer responsibility and allow Comtech to provide end to end
11 911 service to all PSAPs from day one. WMD had evaluated Comtech's competence and
12 credentials to provide 911 service and had selected Comtech as the state's new provider.
13 From CenturyLink's perspective, it was unduly complicated and created unnecessary risk
14 for CenturyLink to remain in the middle of call flows destined for Comtech PSAPs. WMD
15 and Comtech rejected this proposal, and instead a three-phase transition plan was adopted.

16 **Q. PLEASE DESCRIBE THE THREE PHASES.**

17 **A.** Mr. Klein summarizes the three phases of the Washington transition in his Response
18 Testimony (see Klein Response, at pages 5-6). The December 2018 outage occurred
19 during Phase 1. At that time, all 911 calls in Washington were first routed on the
20 CenturyLink 911 network and either routed from the Intrado selective router to the
21 CenturyLink PSAP or (in the case of Comtech PSAP calls) from the Intrado selective

³⁰ See Lobdell Response, at 3-5.

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Exhibit ~~SJH~~ JWS-1TC

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1 router to the Intrado/CenturyLink gateway, over an inter-tandem trunk (“ITT”), and to the
2 Comtech gateway for handling to the Comtech PSAP. The Phase I call flow is succinctly
3 summarized in Mr. Klein’s testimony at pages 6 (Figure 1) and 10 (Figure 2), as well as
4 Exhibits CDK-3 and CDK-4.

5 **Q. HOW DID CENTURYLINK’S CONTRACTUAL RELATIONSHIP WITH WMD**
6 **CHANGE ONCE WMD SELECTED COMTECH AS THE NEW 911 SERVICE**
7 **PROVIDER?**

8 **A.** In July 2017, the company and WMD executed Amendment M to the 2009 contract under
9 which the company had operated as the state’s 911 service provider. Section 11.1.a of
10 Amendment M sets out the relative responsibilities of Comtech and CenturyLink during
11 Phase 1 of the transition. It states:

12 “Prior to this cutover, Contractor [CenturyLink] shall route calls over ESInet I to
13 the appropriate PSAP and, as such, during this time, Contractor is a Covered 911
14 Service Provider as defined in 47 C.F.R. §12.4(a)(i)(A) (‘Covered 911 Service
15 Provider’) for all PSAPs in the State. Upon the Department’s cut over of one or
16 more PSAPs to ESInet II (‘Migrated PSAPs’), the Department’s successor
17 provider [Comtech] shall be a Covered 911 Service Provider for such Migrated
18 PSAPs and shall be solely responsible for routing calls from the Demarcation
19 Point between ESInet I and ESInet II to such Migrated PSAPs. *During the PSAP*
20 *Migration, Contractor remains responsible for routing calls to PSAPs that have*
21 *not migrated to ESInet II (‘Unmigrated PSAPs’), and for routing calls intended*
22 *for Migrated PSAPs to the Demarcation Point at ESInet II, at which point the*

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1 *successor provider assumes responsibility for delivering such calls to Migrated*
2 *PSAPs and is therefore the Covered 911 Service Provider.*³¹

3 **Q. IS “DEMARCATIION POINT” DEFINED BY THE CONTRACT OR BY THE**
4 **STAKEHOLDERS?**

5 **A.** For reasons unknown to me, the contract itself does not appear to define “Demarcation
6 Point.” However, in November 2016 Comtech (during the course of leading the transition
7 design and planning) identified the demarcation point,³² and that point is reflected on
8 CLC’s call flow diagram.³³ CLC witness Steven Turner’s testimony describes Comtech’s
9 process of pinpointing of the demarcation, and explains how it logically represents the
10 point at which the functional responsibility has been handed over to Comtech for a 911 call
11 destined for a Comtech PSAP.³⁴ As Mr. Turner discusses, for Washington 911 calls that
12 were first routed via the CenturyLink 911 network for delivery to a Comtech PSAP, the
13 demarcation point on the signaling network was the point where the CenturyLink/Intrado
14 STP sent an initial address message (“IAM”) to the Comtech STP. After that IAM
15 message was sent, Comtech’s STP would ping the Comtech gateway to determine what
16 channel was available on Comtech’s ITT connecting the two ESInets so that the voice call
17 could be completed. The SS7 links carrying the message between the Comtech STP and
18 the Comtech gateway are part of the Comtech 911 network, not the CenturyLink 911
19 network. Those are the network components that failed during the network event.

³¹ See Exhibit SJH-9C (italics added).

³² See Response Testimony of Steven E. Turner (Exh SET-1TC) (“Turner Response”), at 44, Exhibit SET-5C.

³³ See Exhibit CDK-3.

³⁴ Turner Response, at 44.