











1 of Washington's network certainly should have reviewed the entire network  
2 design between Intrado and Comtech. Any such detailed review would have  
3 shown them that all four links were provisioned in the same network, which I  
4 believe would not have been acceptable to any expert, no matter whether physical  
5 redundancy was achieved. Based on the design used, I believe CenturyLink's  
6 experts either did not conduct the needed review, or did so but lacked the ability  
7 to spot this issue.

8 **Q. Please summarize your conclusions regarding CenturyLink's responsibilities**  
9 **and obligations at the time of the outage.**

10 A. The contract between WMD and CenturyLink made CenturyLink responsible not  
11 just for routing and delivery of calls, but for network and transport as well. As the  
12 transition from CenturyLink to Comtech occurred, subsequent contract  
13 amendments relieved CenturyLink of responsibility for routing and delivery to  
14 PSAPs that transitioned to Comtech, but did not relive the Company of its  
15 network and transport responsibility. In fact, CenturyLink provided network and  
16 transport for both signaling and voice all the way from Intrado to Comtech.  
17 Accordingly, CenturyLink bears responsibility for the failure of that network and  
18 transport.

19 Additionally, WMD, the agency responsible for overseeing the statewide  
20 9-1-1 system, believes CenturyLink retained a role, and thus an obligation, under  
21 its contract that would not end until no parts of the originating or terminating  
22 networks were connected to CenturyLink. WMD also believes strongly that the  
23 citizens of Washington expect that any entity involved in the process of