

BEFORE THE WASHINGTON  
UTILITIES AND TRANSPORTATION COMMISSION

Docket UT-181051

*Washington Utilities & Transportation Commission v. CenturyLink Communications, LLC*

RESPONSE OF PUBLIC COUNSEL TO CENTURYLINK  
DATA REQUEST NO. 32C

Request No: 32C  
Directed to: Public Counsel  
Date Received: September 23, 2022  
Date Produced: October 7, 2022  
Prepared by: Brian Rosen  
Witnesses: Brian Rosen

**DATA REQUEST NO. 32C.**

Does Mr. Rosen agree that, at the time of the December 2018 outage, Comtech's SS7 links would have enjoyed supplier diversity and network diversity had Comtech accepted TNS's August 2018 proposal to replace two of its four SS7 circuits with [REDACTED] [REDACTED]? (see Exhibit SH-12C, pp. 8/92 – 10/92). If your answer is other than yes, fully explain your response.

**RESPONSE:**

There was no evidence on the record to show if TNS or Comtech made sure that the IPX service did not use the Green network, but assuming that at least one of the IP connections between TNS and Comtech were not provisioned on the Green network, Mr. Rosen agrees that supplier diversity and network diversity would have been present had two IPX connections been in place in addition to any CenturyLink connections.

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**RESPONSE OF PUBLIC COUNSEL TO CENTURYLINK  
DATA REQUEST NO. 34**

Request No: 34  
Directed to: Public Counsel  
Date Received: September 23, 2022  
Date Produced: October 7, 2022  
Prepared by: Brian Rosen  
Witnesses: Brian Rosen

**DATA REQUEST NO. 34.**

At page 11 (lines 7-11) of his Cross-Answering Testimony, Mr. Rosen asserts that “we really don’t know” if the Infinera green network failure caused failures on other CenturyLink transport networks. Is Mr. Rosen aware of any CenturyLink networks other than the Infinera green network that experienced software problems, hardware problems or failed calls during the December 2018 green network outage? If your answer is other than no, fully explain your response and produce all documents supporting your response.

**RESPONSE:**

The text on page 11 refers to CenturyLink’s assertion that the failure on the Red network could not have occurred on the Green network. Mr. Rosen is not aware of any CenturyLink networks other than the Infinera Green network that experienced software problems, hardware problems or failed calls during the December 2018 Green network outage.

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**RESPONSE OF PUBLIC COUNSEL TO CENTURYLINK  
DATA REQUEST NO. 37**

Request No: 37  
Directed to: Public Counsel  
Date Received: September 23, 2022  
Date Produced: October 7, 2022  
Prepared by: Brian Rosen  
Witnesses: Brian Rosen

**DATA REQUEST NO. 37.**

Does Mr. Rosen have any basis to believe that Comtech or TNS informed CLC, upon ordering the circuits Comtech would use for SS7 links to support Washington 911 calling, that the circuits would be used as SS7 links in support of Washington 911 calling? If your answer is other than no, fully explain your response and produce all documents supporting your response.

**RESPONSE:**

No.

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**RESPONSE OF PUBLIC COUNSEL TO CENTURYLINK  
DATA REQUEST NO. 39**

Request No: 39  
Directed to: Public Counsel  
Date Received: September 23, 2022  
Date Produced: October 7, 2022  
Prepared by: Brian Rosen  
Witnesses: Brian Rosen

**DATA REQUEST NO. 39.**

Does Mr. Rosen believe that, once the Phase 1 transition network was designed in early 2017, CenturyLink:

- a. had awareness or visibility into how Comtech would design, construct or maintain its SS7 links supporting the interconnection between ESInet1 and ESInet 2?
- b. had decision-making authority over how Comtech would design, construct or maintain its SS7 links supporting the interconnection between ESInet1 and ESInet 2?
- c. was actually involved in the decision about how Comtech would design, construct or maintain its SS7 links supporting the interconnection between ESInet1 and ESInet 2?

For each of subpart a-c that your answer is other than no, fully explain your response and produce all documents supporting your response.

**RESPONSE:**

- a. Mr. Rosen does not believe that CenturyLink had awareness or visibility into Comtech's design, construction or maintenance practice of the interconnect, but because it was, by contract, responsible for "network" and "transport", it should have been.
- b. Mr. Rosen does not believe CenturyLink had decision making authority over Comtech, but could have advised them, and could have made WMD aware of any issues.
- c. Mr. Rosen does not believe that CenturyLink was actually involved, but, as noted in the answer to subsection 'a' above, should have been.

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**RESPONSE OF PUBLIC COUNSEL TO CENTURYLINK  
DATA REQUEST NO. 45**

Request No: 45  
Directed to: Public Counsel  
Date Received: September 23, 2022  
Date Produced: October 7, 2022  
Prepared by: Brian Rosen  
Witnesses: Brian Rosen

**DATA REQUEST NO. 45.**

At pages 22-23 of his Cross-Answering Testimony, Mr. Rosen asserts that, notwithstanding Amendment M to the WMD-CenturyLink contract, CenturyLink was “still responsible for the network and transport at the time of the outage.”

- a. Does Mr. Rosen believe that CLC would have been responsible (both for purposes of its obligations to WMD and its obligations under the statutes and rules cited in the complaint) if in December 2018 a 911 call destined for a Comtech PSAP failed because of a failure on the transport facilities connecting the Comtech gateway and the Comtech PSAP? If your answer is other than no, fully explain your response.
- b. If, after becoming aware of Sprint’s discontinuation of service in 2017, Comtech had migrated all 4 SS7 links to AT&T, does Mr. Rosen believe that CLC would have been responsible (both for purposes of its obligations to WMD and its obligations under the statutes and rules cited in the complaint) if in December 2018 a 911 call destined for a Comtech PSAP failed because of a failure on AT&T’s transport network? If your answer is other than no, fully explain your response.

**RESPONSE:**

Yes. The original contract makes CenturyLink responsible for network and transport as well as routing and ALI services. Amendment M defines when CenturyLink’s responsibility for routing and ALI service transitions, but does not say that CenturyLink’s responsibility for network and transport transitions. Mr. Rosen is not a lawyer and cannot offer a legal interpretation, but as an engineer, and subject matter expert, he believes that CenturyLink was responsible for network and transport for all calls regardless of what facilities a failure occurred and regardless of what vendors were involved.