

**BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

**WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION,**

**Complainant,**

**v.**

**CENTURYLINK COMMUNICATIONS,  
LLC,**

**Respondent.**

**DOCKET UT- 181051**

**EXHIBIT TO  
TESTIMONY OF**

**STACY J. HARTMAN**

**ON BEHALF OF  
CENTURYLINK COMMUNICATIONS, LLC**

*CLC RESPONSE TO DATA REQUEST PC 37*

**March 31, 2022**

**PC-37 Re: Comtech Response to Public Counsel Data Request 4.**

Correspondence between CenturyLink, Comtech, and Washington Military Department (WMD) shows that active discussions were in progress to transfer calls between CenturyLink and Comtech with IP connections from the beginning of the project. The correspondence shows discussion of details of such an interface. Then suddenly, the interface was changed to TDM (SS7) connection, apparently at the request of CenturyLink, in one meeting.

- a) Please explain why that change was made.
- b) Please supply any communication not already provided that shows how that decision was changed from an IP connection to a TDM (SS7) connection.

**RESPONSE:**

CLC will supplement its objections and responses to this data request.

**Respondent: CenturyLink Legal**

**SUPPLEMENTAL RESPONSE 10/25/21**

CLC objects to the introduction to the data request to the extent that Public Counsel is asserting the existence or truth of facts. CLC further objects on the basis that the request is overly broad and unduly burdensome. CLC further objects on the basis that the data request is not reasonably calculated to lead to the discovery of admissible evidence. Without waving its objections, CLC responds as follows.

The premise of this data request is incorrect. Public Counsel is assuming as true that WMD, Comtech, and CenturyLink had agreed to an IP (rather than an SS7/TDM) solution, but that is untrue. The parties were discussing these alternatives, but no decision was made. There were not “active discussions in progress to transfer calls between CenturyLink and Comtech with IP connections from the beginning of the project.”

While CLC rejects Public Counsel’s assertion that any “decision was changed from an IP connection to a TDM (SS7) connection,” CLC has performed a diligent review for communications regarding this discussion point. CLC located one email exchange (attached as Confidential Attachment PC-37, Bates numbers CLC-003261-CLC-003263) from February 2017, [REDACTED]

Furthermore, CLC does not accept the assumption that, had the two ESInets been connected via SIP rather than SS7, the outage would not have occurred. It is possible that

the hypothetical SIP connections would have utilized the same underlying network that experienced the network outage.

**Respondent: CenturyLink Legal**  
**Carl Klein, Manager Public Safety Services**





