



STATE OF WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION

1300 S. Evergreen Park Dr. S.W., P.O. Box 47250 • Olympia, Washington 98504-7250

(360) 664-1160 • TTY (360) 586-8203

February 1, 2019

Susan C. Goldhar Ornstein
Senior Director – Legal & Regulatory Affairs
Safety & Security Technologies
Comtech Telecommunications Corp.
275 West Street, Suite 400
Annapolis, MD 21401

Dear Ms. Goldhar Ornstein:

The Utilities and Transportation Commission is conducting an investigation into the December 27, 2018, emergency 911 call dispatch systems failure that caused outages throughout the state of Washington.

To complete this investigation, commission staff requests the following information from Comtech Telecommunications Corp. (Comtech), related to the outage:

- CP1: The number of Washington affected customers, identified by customer type (commercial or residential), and Comtech services affected.
- CP2: A chronology of all internal communications related to the outage, including summaries of telephone calls and copies of any emails or other written correspondence.
- CP3: A chronology of all communications with stakeholders related to the outages (such as commission staff, other federal, state, county, and local governments), including summaries of telephone calls and copies of any emails or other written correspondence.
- CP4: A chronology of service restoral by location, number of customers, and service type.
- CP5: At the time of the outage, did Comtech have a communications plan in place? If so, please provide a copy.
- CP6: Please provide a summary of any credits for the outage that were/will be provided.

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CP7: The name, title, telephone number, and email address of the contact person whom our staff can work with directly for questions that may arise concerning any details of the information provided.

Please provide all requested information no later than **Feb. 15, 2019**, in electronic format using Microsoft Word for narrative documents and Excel for data. Extension requests may be granted on a case-by-case basis. A request for extension must be made in writing prior to the deadline and must include the reason for the extension.

The response should be directed to Susie Paul, Compliance Investigations. Please include a copy of this letter with your response. If you have questions regarding this request, please contact Ms. Paul at Susie.Paul@utc.wa.gov or (360) 664-1105.

Sincerely,



Mark Johnson
Executive Director and Secretary

GENERAL INSTRUCTIONS

1. Please send all electronic documents and data in *native format*. For any documents that cannot be transmitted via email, please provide the documents on a thumb drive. Staff can no longer accept compact discs.
2. Please review all Excel documents and work papers for hidden cells. Hidden cells include hidden worksheets, columns, rows, and ranges. Please ensure that all items provided pursuant to these Requests do not contain any hidden cells or formulas.
3. For any documents produced, filenames may not contain any of the following characters: [& " ' ? < > # { } % ~ / \]

DATA REQUESTS DIRECTED TO: TeleCommunication Systems, Inc. REQUESTED BY: Regulatory Services Staff

UTC STAFF DATA REQUEST NO. RS-1:

During the WA 911 outage period covering Dec. 27 – Dec. 28, 2018, what was the state of the PSAP migration project for the transitioning of CenturyLink PSAP service and management to TCSYS/Comtech PSAP service and management? AS

UTC STAFF DATA REQUEST NO. RS-2:

Please report on which of the three phases of the migration project were each of the PSAPs in at the time of the outage (all WA PSAPs not just those migrating to TCSYS/Comtech).

AS: Phase I of the transition

UTC STAFF DATA REQUEST NO. RS-3:

In response to request for information CP4, at page 2, the company responded:

During the Washington Outage, TCS observed an intermittent loss of circuit redundancy for all active Washington customers over a forty-nine (49) hours and thirty-two (32) minute period, starting at 0048 PT on December 27, 2018. More specifically, TCS's services were completely unavailable to receive 911 call traffic due to complete CenturyLink circuit failures during the following three time-periods

A. Were both primary and alternate networks and/or circuits between CenturyLink and the TCSYS/Comtech ESInet2 down or were the networks and/or circuits up and network services down that run on those networks and/or circuits?

B. What circuit, network and management services into CenturyLink infrastructure did TCSYS/Comtech have during the WA 911 outage period covering Dec. 27 – Dec. 28, 2018?

Impact signaling, circuits network itself were not down; connection between TCS and TNS (provided by CTL) were the ones that were down; the TNS circuits (provided by

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UTC Staff Data Request Nos. RS-1 – RS-3 to TeleCommunication Systems, Inc.

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C. Please provide any network management data and circuit state reports for the outage period for the failed CenturyLink circuits feeding the TCSYS/Comtech ESInet2.

RESPONSE INSTRUCTIONS

Please provide all requested information no later than **September 5, 2019**, in electronic format using Microsoft Word for narrative documents and Excel for data. Extension requests may be granted on a case-by-case basis. A request for extension must be made in writing prior to the deadline and must include the reason for the extension.

The response should be directed to Rebecca Beaton, Senior Staff. Please include a copy of this request in your response. If you have questions regarding this request, please contact Ms. Beaton at rebecca.beaton@utc.wa.gov or (360) 664-1287.

GENERAL INSTRUCTIONS

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DATA REQUESTS DIRECTED TO: TeleCommunication Systems, Inc.
REQUESTED BY: Regulatory Services Staff

UTC STAFF (REVISED) DATA REQUEST NO. 3:

In response to request for information CP4, at page 2, the company responded:

During the Washington Outage, TCS observed an intermittent loss of circuit redundancy for all active Washington customers over a forty-nine (49) hours and thirty-two (32) minute period, starting at 0048 PT on December 27, 2018. More specifically, TCS's services were completely unavailable to receive 911 call traffic due to complete CenturyLink circuit failures during the following three time-periods

A. (No clarification requested, please refer to DRs sent on August 22, 2019 for question and response timeline)

B. Based on the above statement that "TCS observed an intermittent loss of circuit redundancy," please provide any detailed network level management information and/or process that was used to determine that CenturyLink circuit redundancy failed.

Given that the actual (rather than potential or virtual) physical networks and circuits were in an 'up state' with only the services and actual call/data using those physical networks and circuits in a 'down state,' what methods and network management information did TCS use to determine a failure of circuit redundancy?

C. At the time of the December outage, what actual (rather than potential or virtual) OSI Model Layer 1-3 physical and logical network connectivity did TCS have and use with CenturyLink that was used for 911 call and service delivery? Please include and describe what circuit and network management services and information were used to determine the CenturyLink outages.

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RESPONSE INSTRUCTIONS

Please provide all requested information no later than **September 12, 2019**, in electronic format using Microsoft Word for narrative documents and Excel for data. Extension requests may be granted on a case-by-case basis. A request for extension must be made in writing prior to the deadline and must include the reason for the extension.

The response should be directed to Rebecca Beaton, Senior Staff. Please include a copy of this request in your response. If you have questions regarding this request, please contact Ms. Beaton at rebecca.beaton@utc.wa.gov or (360) 664-1287.