

**CONFIDENTIAL PER PROTECTIVE ORDER IN DOCKET NO. UT-181051***UTC v. CenturyLink*, Docket UT-181051

TSYS Response to UTC Staff Data Request Nos. 7-9

November 5, 2021

**UTC STAFF DATA REQUEST NO. 7:**

**In response to Public Counsel Data Request 10, TSYS indicated, in part, that the “network design implemented was based on industry best practices.” Please identify the date on which TSYS considers the network design was “implemented.” Then answer the following question subparts in reference to that date (i.e., limit to those industry best practices in effect prior to that date). If the network design reflected specific industry standards that TSYS considers to have been industry best practices, include in your response citations to those industry standards.**

**RESPONSE:**

TSYS objects to this data request as it is unduly burdensome, is not reasonably calculated to lead to the discovery of admissible evidence, and not proportionate to the needs of the case. TSYS engaged in a good faith search for available information, however, TSYS cannot point to specific industry best practices as requested in DR 7(a)-(d), below, because such design decisions were made many years ago, and the design decision-making process is not documented in such a granular manner.

Industry best practices were used in TSYS’s response to Public Counsel Data Request 10 to mean generally accepted standards. Standards evolve as the industry moves forward. At the time of deployment, the then-current version of the NENA Emergency Services IP Network Design Information Document,<sup>1</sup> reflected the general TSYS design implementation.

TSYS emphasizes that industry best practices are (often generic) descriptions of a general network that may be true for many use cases, but do not account for every possible NG9-1-1 network need or a specific use case. TSYS’s engineering and emergency communications experts designed the Washington NG9-1-1 system by looking to industry best practices for guidance in designing the architecture for NG9-1-1 systems. When a specific scenario in Washington was not covered by existing best practices, TSYS relied on its experts to make design decisions in accordance with sound engineering principles, as well as lab and preproduction systems to test and validate experts’ assumptions, which is a standard, reasonable approach within the communications industry. In addition, decisions may be tailored based on customer requirements and input.

- a. Identify those “industry best practices” that directly relate to signaling, access to ALI, and/or access to Location Database records for purposes of supporting the Washington PSAPs receiving 911 calls on ESInet2 from ESInet1.**

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<sup>1</sup> See NENA Emergency Services IP Network Design Information Document, NENA-INF-016.2-2018, (originally 08-506) (2018), [https://cdn.ymaws.com/www.nena.org/resource/resmgr/standards/NENA-INF-016.2-2018\\_ESIND\\_20.pdf](https://cdn.ymaws.com/www.nena.org/resource/resmgr/standards/NENA-INF-016.2-2018_ESIND_20.pdf)

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- b. Identify those “industry best practices” that directly relate to signaling, access to ALI, and/or access to Location Database records for purposes of supporting the Washington PSAPs receiving 911 calls on ESInet2 after they were fully transitioned from ESInet1.**
- c. Identify those “industry best practices” that directly relate to transporting voice messages (or packets) to those Washington PSAPs receiving 911 calls on ESInet2 from ESInet1.**
- d. Identify those “industry best practices” that directly relate to transporting voice messages (or packets) to those Washington PSAPs receiving 911 calls from CenturyLink and/or other carriers on ESInet 2 after they had been fully transitioned from ESInet1 to ESInet2.**