

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION STAFF  
RESPONSES TO DATA REQUESTS

DATE PREPARED: September 22, 2022  
DOCKET: UT-181051  
REQUESTER: CenturyLink

WITNESS: Commission Staff  
RESPONDER: Commission Staff

**CENTURYLINK DATA REQUEST NO. 28:**

Mr. Akl and Mr. Webber assert that the “primary and avoidable cause” of the December 2018 outage was CLC’s failure to disable the IGCC. Admit or deny the following. For each subpart that Staff fails to admit, fully explain your answer and identify and produce all documents that support your answer.

- a. Few, if any, of the 911 calls intended for Comtech PSAPs on December 27-28, 2018 would have failed notwithstanding the Infinera green network event IF Comtech had deployed two of its four SS7 links (supporting the inter-tandem trunk connecting ESInet1 and ESInet2) via CLC’s Infinera green network and the other two via **transport circuits on Comtech’s own network.**
- b. Few, if any, of the 911 calls intended for Comtech PSAPs on December 27-28, 2018 would have failed notwithstanding the Infinera green network event IF Comtech had deployed two of its four SS7 links (supporting the inter-tandem trunk connecting ESInet1 and ESInet2) via CLC’s Infinera green network and the other two via **transport circuits on an AT&T network.**
- c. Few, if any, of the 911 calls intended for Comtech PSAPs on December 27-28, 2018 would have failed notwithstanding the Infinera green network event IF Comtech had deployed two of its four SS7 links (supporting the inter-tandem trunk connecting ESInet1 and ESInet2) via CLC’s Infinera green network and the other two via **transport circuits on another of CenturyLink/Lumen’s stand-alone optical networks.**
- d. Few, if any, of the 911 calls intended for Comtech PSAPs on December 27-28, 2018 would have failed notwithstanding the Infinera green network event IF Comtech had deployed two of its four SS7 links (supporting the inter-tandem trunk connecting ESInet1 and ESInet2) via CLC’s Infinera green network and the other two [REDACTED]. (see Exhibit SH-12C, pp. 8/92 – 10/92)

**RESPONSE:**

Staff objects to this request as overbroad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence, and/or not proportionate to the needs of the case. Staff further objects on the basis that the material sought by the request is: (a) not in Staff’s possession, custody, or control; (b) already in the Company’s possession, custody, or control; (c) publicly available; and/or (d) obtainable from some other source that is more convenient, less burdensome, or less expensive. Staff further objects to this request to the extent it requests more than is required by the Commission’s rules and orders. Staff further objects that this request would improperly require the creation of new data and/or documents

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on the part of Staff. *See* WAC 480-07-400(1)(c)(iii). Staff further objects to the data request to the extent that the Company is asserting/assuming the existence of facts. Staff further objects to this request to the extent it seeks speculative and/or hypothetical information. Staff further objects to this request to the extent that it is beyond the scope of Dr. Akl's and Witness Webber's testimonies.

Without waving the above objections, Staff responds as follows:

The opinions of Dr. Akl and Witness Webber relevant to this case are supplied in their respective testimonies.

SUPPLEMENTAL RESPONSE

Without waiving the above objections, Staff supplements its response as follows:

Staff denies each of the requests for admission numbered 28.a, 28.b, 28.c, and 28.d. The alleged facts Staff are asked to admit are speculative and counterfactual. *See* Cross Answering Testimony of James Webber, 6:1-15:10; Response Testimony of Steven E. Turner, 25 n. 17.