

**BEFORE THE WASHINGTON UTILITIES
AND TRANSPORTATION COMMISSION**

**WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,**

Complainant,

v.

**QWEST CORPORATION
d/b/a CENTURYLINK QC,**

Respondent.

DOCKET UT-190209

March 31, 2020

PC-7 Between April 2014 and the completion of the transition to Comtech, did CenturyLink or any entity on behalf of CenturyLink comprehensively audit, assess, or examine the integrity and reliability of the 911 system, policies and procedures? If so, please describe the frequency of such audits, assessments or examinations.

Response:

Yes. Annually, starting in April of 2015 through 2018. CenturyLink is not currently the 911 provider in Washington.

Respondent: Carolyn Brown

PC-36 Re: Response Testimony of Random Mills, Exh. RM-1TC

Please refer to the Response Testimony of Random Mills, Exh. RM-1TC at 5:21-6:1, which states, “Because of the large quantity of 911 calls in Washington, we intentionally planned the Washington migration at the end of our project timeline after full development of our method of procedure.”

- 1) Please explain what Mr. Mills means by “the large quantity of 911 calls in Washington.”

RESPONSE:

At the time of the upgrade event, Washington was Intrado’s largest deployment with four colocation areas dedicated for the traffic in Washington. In these four colocation areas, Intrado had roughly 3,200 trunks established to its 911 switch in Englewood, Colorado strictly for Washington traffic.

- 2) Please provide the average number of Washington 911 calls on a daily, weekly, monthly, and annual basis.

RESPONSE:

In 2017 Intrado processed 4,654,076 ALI dips in Washington, which is an average of 387,840 per month, 89,501 per week, and 12,751 per day.

- 3) Please provide the average total number of 911 calls that Intrado processes on a daily, weekly, monthly, and annual basis.

RESPONSE: Intrado is not currently processing 911 calls in Washington, and doesn’t have nation-wide data available for 2017.

RESPONDENT: Random Mills and Intrado Legal

PC-37 Re: Response Testimony of Random Mills, Exh. RM-1TC

Please refer to the Response Testimony of Random Mills, Exh. RM-1TC at 6:4-6, which states, “The legacy [REDACTED] switches at Intrado were aging, end-of-life hardware with no future support available, whereas the new [REDACTED] switches are modern, fully supported hardware with more feature functionality and inherent resiliency.” Please provide the following information:

- 1) Please provide the current net book value of the legacy switches reference above.
- 2) If the net book value of the legacy switches is zero, please provide the date that the switches became fully depreciated.
- 3) Please provide the net book value of the legacy switches as of July 12, 2017.
- 4) Please provide the net book value of the legacy switches on the date they were replaced by the new switches referenced above.

RESPONSE:

CenturyLink does not have the requested information, which relates to Intrado’s internal accounting practices. Even if CenturyLink had access to this information, it is irrelevant, not likely to lead to the discovery of admissible evidence, and therefore objectionable. Net book value does not come into play on a decision such as the one that was made to replace end-of-life switches. The driver of that decision was the fact that the equipment was end-of-life and would no longer be supported by the manufacturer. Please see the information here demonstrating both of those factors:

<https://www.cisco.com/c/en/us/products/collateral/unified-communications/hosted-collaboration-solution-hcs/eos-eol-notice-c51-736183.html>

RESPONDENT: Intrado and CenturyLink Legal