

EXHIBIT C

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION

Complainant,

v.

CENTURYLINK COMMUNICATIONS,
LLC,

Respondent.

DOCKET NO. UT-181051

SUBPOENA FOR DEPOSITION

TO: TRANSACTION NETWORK SERVICES, INC.

FROM: CENTURYLINK COMMUNICATIONS, LLC

Pursuant to the subpoena power granted in RCW 34.05.446 and RCW 80.04.020, and in accordance with WAC 480-07-400(a), you are commanded to appear at the time, date, and place set forth below to testify at the taking of a deposition in the above-captioned case. You are required to designate one or more officers, directors, managing agents, or other persons who consent to testify on your behalf concerning the matters listed in "Attachment A." The person(s) so designated must testify about all information known or reasonably available to the witness.

Date/Time: August 18, 2021, 9:00 a.m. PST

Place: Zoom

DATED: July 8, 2021

By: 

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ATTACHMENT A

DEFINITIONS AND GENERAL INSTRUCTIONS

1. All topics identified below should be construed broadly and as including all facts relating to those topics. For example, where a document is identified as a topic of examination, the topic encompasses other facts relating to the document, including but not limited to its drafting, internal discussions regarding the document, when the document was sent to other parties, etc.
2. “You,” “Your,” “Transaction Network Services, Inc.,” or “TNS” means Transaction Network Services, Inc. and its subsidiaries, affiliates, any past or present employees, consultants, agents, representatives, or other persons acting on behalf of Transaction Network Services, Inc.
3. “Person” includes a natural person and any other legal entity, including but not limited to a firm, association, organization, partnership, business, trust, corporation, or public entity.
4. A reference to any person includes such person’s agents, representatives, and insofar as necessary to preserve the attorney-client privilege, its attorneys.
5. The term “communication” means any and all modes or methods for the transmission or exchange of information between two or more persons or entities, orally or in writing, and includes, without limitation, any conversation or discussion, whether face-to-face or by means of telephone, video, email, text, instant message, facsimile, telegraph, telex, or any other medium, including but not limited to video depositions.
6. The term “document(s)” is used in the broadest possible sense and means: all writings and recordings, including the originals and all non-identical copies, whether different from the original by reason of any notation made on such copies or otherwise (including but without limitation to, email and attachments, correspondence, memoranda, notes, diaries, statistics, letters, telegrams, minutes, contracts, reports, studies, checks, statements, tags, labels, invoices, brochures, periodicals, telegrams, receipts, returns, summaries, pamphlets, books, interoffice and intraoffice communications, offers, notations of any sort of conversations, working papers, applications, permits, file wrappers, indices, telephone calls, meetings or printouts, teletypes, telefax, worksheets, and all drafts, alterations, modifications, changes and amendments of any of the foregoing); graphic or aural representations of any kind (including, without limitation,

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photographs, charts, microfiche, microfilm, videotape, recordings, motion pictures, plans, drawings, surveys); and electronic, mechanical, magnetic, optical, or electric records or representations of any kind (including, without limitation, computer files and programs, tapes, cassettes, discs, recordings), including metadata, and including, without limitation, depositions, exhibits to depositions and responses to Requests for Production. The term “document(s)” also includes all ESI.

7. The present tense includes the past and future tenses.
8. The connectives “and” and “or” shall be construed either disjunctively or conjunctively as necessary to bring within the scope of a request all information or documents that might otherwise be construed to be outside its scope.
9. The words “any” and “all” shall be considered to include each and every.

TOPICS FOR EXAMINATION

TNS shall designate one or more officers, directors, managing agents, or other persons who consent to testify on its behalf with respect to the following topics:

1. Any investigation of an outage on a 911 network that impacted calling to TeleCommunication Systems, Inc. d/b/a Comtech Telecommunications Corporation (“Comtech”) PSAPs in the State of Washington that occurred on or about December 27, 2018.
2. Communications with Comtech, including internal discussions about such communications with Comtech, concerning the outage identified in Request No. 1.
3. Any changes in network design that You took or considered talking as a result of the outage identified in Request No. 1.
4. Communications with CenturyLink, including internal discussions about such communications with CenturyLink, concerning the outage identified in Request No. 1.
5. Each specific circuit ID and location utilized by TNS to support Comtech’s 911 network in Washington.

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6. Communications with Comtech, including internal discussions about such communications with Comtech, concerning Comtech's 911 network in Washington, including but not limited to, Comtech's expectations for:
 - a. SS7 Link diversity;
 - b. Physical diversity of the SS7 links;
 - c. Geographic diversity of SS7 links;
 - d. Carrier diversity for SS7 links; and/or
 - e. Diversity of network monitoring links.
7. Your efforts to ensure the network transmitting calls and/or signaling messages to Comtech's PSAPs was supported by:
 - a. SS7 Link diversity;
 - b. Physical diversity of the SS7 links;
 - c. Geographic diversity of SS7 links;
 - d. Carrier diversity for SS7 links; and/or
 - e. Diversity of network monitoring links.
8. Communications with CenturyLink, including internal discussions about such communications with CenturyLink, concerning Your desire to ensure the network transmitting calls and/or signaling messages to Comtech's PSAPs was supported by:
 - a. SS7 Link diversity;
 - b. Physical diversity of the SS7 links;
 - c. Geographic diversity of SS7 links;
 - d. Carrier diversity for SS7 links; and/or
 - e. Diversity of network monitoring links.
9. Any audits or other evaluations between January 1, 2017 and December 31, 2019 of the network transmitting calls and/or signaling messages to Comtech's PSAPs (and if the

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audit was of a larger network, but included the network transmitting calls and/or signaling messages to Comtech's PSAPs, produce those as well).

10. Any audits or other evaluations between January 1, 2016 and December 31, 2019 of the network transmitting calls and/or signaling messages to Comtech's PSAPs (and if the audit was of a larger network, but included the network transmitting calls and/or signaling messages to Comtech's PSAPs, produce those as well) to ensure compliance with industry standards and/or expectations for carriers providing 911 service.