

EXHIBIT B

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: TELECOMMUNICATION SYSTEMS, INC. D/B/A COMTECH TELECOMMUNICATIONS CORP.

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 19, 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,” “Comtech Telecommunications Corp.,” “Comtech,” or “TeleCommunication Systems, Inc.” means TeleCommunication Systems, Inc. d/b/a Comtech Telecommunications Corp. and its subsidiaries, affiliates, any past or present employees, consultants, agents, representatives, or other persons acting on behalf of Comtech Telecommunications Corp.
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,

ATTACHMENT A

and all drafts, alterations, modifications, changes and amendments of any of the foregoing); graphic or aural representations of any kind (including, without limitation, 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

Comtech Telecommunications, Inc. 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. Your investigation of the outage that occurred on the 911 network in the State of Washington on or about December 27, 2018.
2. Communications with or communications regarding the Washington Utilities and Transportation Commission (or its Staff) about the outage identified in Request No. 1.
3. Communications with or communications regarding the Washington State Enhanced 911 Coordinator (or its Staff) about the outage identified in Request No. 1.
4. Communications with or communications regarding the Federal Communications Commission (or its Staff) about the outage identified in Request No. 1.
5. Communications with or communications regarding the Washington Military Department (or its Staff) about the outage identified in Request No. 1.

ATTACHMENT A

6. Communications with or communications regarding Public Counsel (or its Staff) about the outage identified in Request No. 1.
7. Communications with or communications regarding any other public agency about the outage identified in Request No. 1.
8. Any allegations of contractual or Service Level Agreement (SLA) violations as a result of the outage identified in Request No. 1.
9. Your efforts, if any, between January 1, 2017 and December 31, 2019, to ensure that the network You used to provide 911 service within the State of Washington was designated with:
 - 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.
10. Any audits or other evaluations You performed or had performed of Your 911 network, including but not limited to SS7 links, in the State of Washington (or if not specific to the State of Washington including the State of Washington) between January 1, 2016 and December 31, 2019.
11. Any audits or other evaluations You performed or had performed of Your 911 network, including but not limited to SS7 links, in the State of Washington (or if not specific to the State of Washington including the State of Washington), to ensure compliance with industry standards and/or expectations for carriers providing 911 service and/or contractual obligations.
12. Communications with or communications regarding Transaction Network Services (“TNS”) regarding Your expectations for:
 - a. SS7 Link diversity;

ATTACHMENT A

- 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.
13. Communications with or communications regarding TNS about the outage identified in Request No. 1.
 14. Any corrective or other action You took as a result of the outage identified in Request No. 1.
 15. The terms and conditions of Your contract with the Washington Military Department that was in effect at the time of the outage.
 16. Any concerns raised about Your 911 network architecture in a South Dakota lawsuit captioned State of South Dakota Department of Public Safety on Behalf of South Dakota 9-1-1 Coordination Board v. Nexgen Communications, Telecommunications Systems Inc., and Comtech Telecommunications Corp, 32 CIV 19-000169.