



**STATE OF WASHINGTON
MILITARY DEPARTMENT
EMERGENCY MANAGEMENT DIVISION**

*MS: TA-20 Building 20
Camp Murray, Washington 98430-5122
Phone: (253) 512-7000 • FAX: (253) 512-7200
Website: <http://www.mil.wa.gov>*

August 4, 2017

Steven King
Executive Secretary
Utilities and Transportation Commission
PO Box 47250
Olympia, WA 98504-7250

RE: CenturyLink-Level 3 Merger, Docket #UT-170042

Dear Mr. King:

CenturyLink has informed the State 911 Coordination Office (SECO) that they intend to file the entirety of Amendment M to Washington Military Department Contract E09-196 Qwest – E911, the contract through which CenturyLink provides the Next Generation 911 Emergency Services IP Network (ESInet) to the state of Washington. According to the notification received, CenturyLink is submitting this amendment to satisfy the requirements of Order 03 Approving Settlement of Docket #UT-170042 and must do so by August 10, 2017.

Amendment M to Washington Military Department Contract E09-196 Qwest – E911, contains the party's agreement regarding the detailed transition of services from the current ESInet to the successor vendor's ESInet. This document contains detailed technical specifications of the interconnection of the two ESInets, the release of which would create a cyber security risk. Some of the information contained in this document is exempt from disclosure under RCW 42.56.420, Security, subparagraph (4), which reads as follows.

Information regarding the infrastructure and security of computer and telecommunications networks, consisting of security passwords, security access codes and programs, access codes for secure software applications, security and service recovery plans, security risk assessments, and security test results to the extent that they identify specific system vulnerabilities, and other such information the release of which may increase risk to the confidentiality, integrity, or availability of agency security, information technology infrastructure, or assets;

SECO did not understand that the UTC's order required the entire agreement of the parties to be provided to the UTC. Therefore, the SECO has asked CenturyLink to mark specific sections and information within the document as Confidential when they make their filing. We understand that this only restricts the marked information from public view.

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The SECO respectfully requests that the UTC assert the security exemption should there be a public records request to view or copy the information marked as confidential, and short of that, to provide notification to the Washington Military Department Public Records office prior to any public release of the marked information and allow it sufficient time in which to file a motion for a protective order.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Adam Wasserman', with a long horizontal flourish extending to the right.

Adam Wasserman
Washington State E911 Administrator

cc: Rebecca Beaton, Washington State Utilities and Transportation Commission