

EXH. SET-8
Docket UT-181051
Witness: Steven E. Turner
WUTC DOCKET: UT-181051
EXHIBIT: SET-8
ADMIT W/D REJECT

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

**WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,**

Complainant,

v.

**CENTURYLINK COMMUNICATIONS,
LLC,**

Respondent.

DOCKET UT- 181051

**EXHIBIT TO
TESTIMONY OF**

STEVEN E. TURNER

**ON BEHALF OF
CENTURYLINK COMMUNICATIONS, LLC**

*EMAIL ENTITLED "RE: DOCKET No. UT-181051 - CENTURYLINK'S SECOND SET OF
DATA REQUESTS TO COMTECH"*

March 31, 2022

From: Susan Ornstein <Susan.Ornstein@comtech.com>
Sent: Friday, March 18, 2022 11:33 AM
To: Chuck Steese
Cc: Sherr, Adam (Adam.Sherr@lumen.com); Yelena Simonyuk
Subject: RE: Docket No. UT-181051 - CenturyLink's Second Set of Data Requests to Comtech [IWOV-IDOCS.FID4117732]

Chuck,

Thank you for taking the time to speak with us today. We just have one minor correction to the statements below, TSYS was able to locate two documents as you mention, however, I believe these are more accurately classified as responsive to CTL-4, not CTL-9.

Susan C. Goldhar Ornstein | Senior Director, Legal & Regulatory Affairs | Safety & Security Technologies | Comtech Telecommunications Corp. | 202-794-4102 (o) | susan.ornstein@comtech.com | www.comtech911.com | @ComtechSST

From: Chuck Steese <CSteese@atllp.com>
Sent: Friday, March 18, 2022 1:18 PM
To: Susan Ornstein <Susan.Ornstein@comtech.com>
Cc: Sherr, Adam (Adam.Sherr@lumen.com) <Adam.Sherr@lumen.com>
Subject: RE: Docket No. UT-181051 - CenturyLink's Second Set of Data Requests to Comtech [IWOV-IDOCS.FID4117732]

WARNING: External Email: Exercise Caution

Counsel:

Thank you for participating in the meet and confer.

To summarize:

1. In response to CTL-9, Comtech has identifies two responsive documents. One Comtech will produce, and the other you have given TNS notice of your intention to produce. The second documents will either be produced, or TNS will step in and seek a protective order.
2. In response to CTL-8, you informed me that Comtech has been unable to identify any responsive documentation.

If any aspect of this summary is inaccurate, pleased let me know.

Regards,



Armstrong Teasdale LLP

Chuck Steese | Partner

4643 South Ulster, Suite 800, Denver, Colorado 80237

MAIN PHONE: 720.200.0676 | MAIN FAX: 720.200.0679

DIRECT: 720-200-0677 | Extension: 3805 | CELL: 303-919-0075

csteese@atllp.com

www.atllp.com

Always exceed expectations through teamwork and excellent client service.

***** PRIVATE AND CONFIDENTIAL*****

This transmission and any attached files are privileged, confidential or otherwise the exclusive property of the intended recipient, Armstrong Teasdale LLP or its subsidiaries. If you are not the intended recipient, any disclosure, copying, distribution or use of any of the information contained in or attached to this transmission is strictly prohibited. If you have received this transmission in error, please contact us immediately by email (admin@atllp.com) or by telephone (+1 800.243.5070) and promptly destroy the original transmission and its attachments. Opinions, conclusions and other information in this message that do not relate to the official business of Armstrong Teasdale LLP or its subsidiaries shall be understood as neither given nor endorsed by it. Armstrong Teasdale LLP and its subsidiaries may monitor email traffic data. Please read our Global Privacy Policy to find out how Armstrong Teasdale LLP and its subsidiaries process personal information.

Armstrong Teasdale LLP is a Missouri-registered limited liability partnership organized under the laws of the State of Missouri, USA. The London office of Armstrong Teasdale LLP is operated by Armstrong Teasdale Limited, a private limited company registered in England and Wales (Registration No. 08879988), that is authorized and regulated by the Solicitors Regulation Authority (SRA No. 657002). The registered office of Armstrong Teasdale Limited is 200 Strand, London WC2R 1DJ. Please review our International Legal Notices.

From: Chuck Steese <CSteese@atllp.com>

Sent: Thursday, March 10, 2022 5:00 PM

To: SUSAN.ORNSTEIN@COMTECH.COM

Cc: Sherr, Adam (Adam.Sherr@lumen.com) <Adam.Sherr@lumen.com>

Subject: FW: Docket No. UT-181051 - CenturyLink's Second Set of Data Requests to Comtech [IWOV-IDOCS.FID4117732]

Counsel:

I just received the Comtech DR responses served almost one week ago (see attached). In reviewing the distribution list in the email below, I am not on it despite being one of the counsel of record for CenturyLink. I am sure this was an innocent oversight. Going forward, please include me in your distributions

Having reviewed the materials, I would like to meet and confer about the adequacy of two responses.

First, Comtech's response to DR CTL-9 states that Comtech found an email exchanged with TNS about diversity, but "Such communications are subject to the confidentiality provisions of our agreement with TNS and, for this reason, are not attached hereto." This is unacceptable. A

protective order has issued in this docket that allows Comtech to produce documents as Confidential. CenturyLink therefore demands the production of this and any other document you have withheld on this basis. If Comtech refuses, we plan to move to compel.

Second, CTL-8. States:

In response to CTL-3(a), you referenced CSRIC 12-10-0594. With regard to CSRIC 12-10-0594:

- a. Describe all steps that you, TNS or any agent and/or consultant took on your behalf to comply with and/or adhere to this standard in connection with your design, construction, and maintenance of your Phase 1 SS7 network in Washington.
- b. Produce all documents showing the steps that you, TNS or any agent and/or consultant took on your behalf to comply and/or adhere to this standard in connection with your design, construction, and maintenance of your Phase 1 SS7 network in Washington.

Comtech's answer is superficial. Among other things, CSRIC 12-10-0594 states that Network Operators and Service Providers should follow industry guidelines for validating SS7 link diversity, which should be performed at a minimum of twice a year, and at least one of those validations should include a physical validation of equipment compared to the recorded documentation of diversity. CenturyLink expected to receive documents showing the efforts Comtech undertook to validate SS7 link diversity twice per year, including physical validation once per year. Once again, CenturyLink demands responsive documents. If Comtech refuses, we plan to move to compel a complete response here as well.

Please let us know how Comtech plans to proceed. I am available to discuss large portions of Friday, March 11, Monday March 14 and Tuesday March 15. Please provide a time(s) that you are available.

Regards,



Armstrong Teasdale LLP

Chuck Steese | Partner

4643 South Ulster, Suite 800, Denver, Colorado 80237

MAIN PHONE: 720.200.0676 | MAIN FAX: 720.200.0679

DIRECT: 720-200-0677 | Extension: 3805 | CELL: 303-919-0075

csteese@atllp.com

www.atllp.com

Always exceed expectations through teamwork and excellent client service.

From: Susan Ornstein <Susan.Ornstein@comtech.com>
Sent: Friday, March 4, 2022 1:33 PM
To: Sherr, Adam <Adam.Sherr@lumen.com>
Cc: 'Lisa.gafken@atg.wa.gov' <Lisa.gafken@atg.wa.gov>; 'Nina.suetake@atg.wa.gov' <Nina.suetake@atg.wa.gov>; 'Ann.paisner@atg.wa.gov' <Ann.paisner@atg.wa.gov>; 'PCCSeaEF@atg.wa.gov' <PCCSeaEF@atg.wa.gov>; 'Stephanie.chase@atg.wa.gov' <Stephanie.chase@atg.wa.gov>; 'Corey.dahl@atg.wa.gov' <Corey.dahl@atg.wa.gov>; 'Chanda.mak@atg.wa.gov' <Chanda.mak@atg.wa.gov>; 'brice.hartman@atg.wa.gov' <brice.hartman@atg.wa.gov>; 'Sally.brown@utc.wa.gov' <Sally.brown@utc.wa.gov>; 'Harry.fukano@utc.wa.gov' <Harry.fukano@utc.wa.gov>; 'Betsy.demarco@utc.wa.gov' <Betsy.demarco@utc.wa.gov>; 'Adam.wasserman@mil.wa.gov' <Adam.wasserman@mil.wa.gov>; 'Dawn.cortez@atg.wa.gov' <Dawn.cortez@atg.wa.gov>; 'TPCEF@atg.wa.gov' <TPCEF@atg.wa.gov>; 'Laura.reese@atg.wa.gov' <Laura.reese@atg.wa.gov>; 'Maudelle.padilla@atg.wa.gov' <Maudelle.padilla@atg.wa.gov>; Addington, Josie <Josie.Addington@lumen.com>
Subject: RE: Docket No. UT-181051 - CenturyLink's Second Set of Data Requests to Comtech

On behalf of TeleCommunication Systems, Inc. ("TSYS"), please find attached TSYS's responses to CenturyLink's Data Requests Nos. 7-10. Please note that TSYS's response to CTL-9 also supplements TSYS's response to CTL-4(v).

Susan C. Goldhar Ornstein | Senior Director, Legal & Regulatory Affairs | Safety & Security Technologies | Comtech Telecommunications Corp. | 202-794-4102 (o) | susan.ornstein@comtech.com | www.comtech911.com | [@ComtechSST](https://www.comtech911.com)

From: Addington, Josie <Josie.Addington@lumen.com>
Sent: Friday, February 18, 2022 6:34 PM
To: Susan Ornstein <susan.ornstein@comtechtel.com>
Cc: Sherr, Adam <Adam.Sherr@lumen.com>; 'Lisa.gafken@atg.wa.gov' <Lisa.gafken@atg.wa.gov>; 'Nina.suetake@atg.wa.gov' <Nina.suetake@atg.wa.gov>; 'Ann.paisner@atg.wa.gov' <Ann.paisner@atg.wa.gov>; 'PCCSeaEF@atg.wa.gov' <PCCSeaEF@atg.wa.gov>; 'Stephanie.chase@atg.wa.gov' <Stephanie.chase@atg.wa.gov>; 'Corey.dahl@atg.wa.gov' <Corey.dahl@atg.wa.gov>; 'Chanda.mak@atg.wa.gov' <Chanda.mak@atg.wa.gov>; 'brice.hartman@atg.wa.gov' <brice.hartman@atg.wa.gov>; 'Sally.brown@utc.wa.gov' <Sally.brown@utc.wa.gov>; 'Harry.fukano@utc.wa.gov' <Harry.fukano@utc.wa.gov>; 'Betsy.demarco@utc.wa.gov' <Betsy.demarco@utc.wa.gov>; 'Adam.wasserman@mil.wa.gov' <Adam.wasserman@mil.wa.gov>; 'Dawn.cortez@atg.wa.gov' <Dawn.cortez@atg.wa.gov>; 'TPCEF@atg.wa.gov' <TPCEF@atg.wa.gov>; 'Laura.reese@atg.wa.gov' <Laura.reese@atg.wa.gov>; 'Maudelle.padilla@atg.wa.gov' <Maudelle.padilla@atg.wa.gov>
Subject: Docket No. UT-181051 - CenturyLink's Second Set of Data Requests to Comtech

WARNING: External Email: Exercise Caution

Attached is CenturyLink Communications, LLC's second set of data requests to Comtech.



Josie Addington

Legal Assistant
1600 7th Avenue, Room 1506
Seattle, Washington 98191
tel: 206-806-7339 | cell: 206-852-3317
josie.addington@lumen.com

This communication is the property of Lumen Technologies and may contain confidential or privileged information. Unauthorized use of this communication is strictly prohibited and may be unlawful. If you have received this

communication in error, please immediately notify the sender by reply e-mail and destroy all copies of the communication and any attachments.

NOTICE TO RECIPIENT: This email, including attachments, may contain information which is confidential, proprietary, attorney-client privileged and / or controlled under U.S. export laws and regulations and may be restricted from disclosure by applicable State and Federal law. Nothing in this email shall create any legal binding agreement between the parties unless expressly stated herein and provided by an authorized representative of Comtech Telecommunications Corp. or its subsidiaries. If you are not the intended recipient of this message, be advised that any dissemination, distribution, or use of the contents of this message is strictly prohibited. If you received this message in error, please notify us immediately by return email and permanently delete all copies of the original email and any attached documentation from any computer or other media.

This communication is the property of Lumen Technologies and may contain confidential or privileged information. Unauthorized use of this communication is strictly prohibited and may be unlawful. If you have received this communication in error, please immediately notify the sender by reply e-mail and destroy all copies of the communication and any attachments.