

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

Docket UT-181051

Washington Utilities & Transportation Commission v. CenturyLink Communications, LLC

**RESPONSE OF PUBLIC COUNSEL TO CENTURYLINK
DATA REQUEST NO. 16**

Request No: 16
Directed to: Public Counsel
Date Received: January 12, 2022
Date Produced: January 27, 2022
Prepared by: Brian Rosen
Witnesses: Brian Rosen

DATA REQUEST NO. 16.

At page 31 of his Direct Testimony, Mr. Rosen states “Had the system used IP for its interconnect as it did with ALI, few calls would have been lost during the outage.”

- a. Does Public Counsel purport to know that IP-based interconnection would not have utilized circuits sitting on the Infinera network affected by the packet storm beginning on December 27, 2018? Please fully explain your response, and produce all documents supporting your response.
- b. Produce all data, documents and other information supporting Mr. Rosen’s conclusion that “[h]ad the system used IP for its interconnect as it did with ALI, few calls would have been lost during the outage.”

RESPONSE:

- a. It is Rosen’s understanding that the ALI connections between Intrado/CenturyLink and Comtech were not significantly impacted by the incident. It is Rosen’s professional opinion that if IP were used, while some connections may have used the Infinera network, there would have been other paths available, and in fact it is likely that most of the paths that were used to maintain ALI traffic would have been available for call traffic.
- b. See Public Counsel’s response to CenturyLink Data Request 16, subpart ‘a’. A defining characteristic of IP networks is that if any path is available, it will be used for traffic, and routing (that is, finding a path) is packet by packet. The ALI IP traffic had paths between Intrado/CenturyLink and Comtech. While it is possible to build IP networks that have very limited paths, it appears that Intrado/CenturyLink and Comtech made choices that resulted in many different paths, most of which did not traverse the Infinera network.