

**BEFORE THE WASHINGTON  
UTILITIES & TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,

Complainant,

v.

CENTURYLINK COMMUNICATIONS, LLC,

Respondent.

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DOCKET UT-181051

**BRIAN ROSEN**

**ON BEHALF OF THE  
WASHINGTON STATE OFFICE OF THE ATTORNEY GENERAL  
PUBLIC COUNSEL UNIT**

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**Exhibit BR-22**

CenturyLink Response to Public Counsel Data Request No. 10

**December 15, 2021**

PC-10 Does the CenturyLink ESInet have a Logging Service as required by National Emergency Number Association (NENA) standard 08-003<sup>2</sup>? If yes, please describe where the system installed in Washington deviates from the 08-003 standard.

**RESPONSE:**

CenturyLink did not have a logging service as contemplated by NENA Standard 08-003 because the standard is an I3 standard and CenturyLink was not utilizing I3 services at the time of the December 2018 outage.

**Respondent: Carl Klein, Manager Public Safety Services**

<sup>2</sup> Nat'l Emergency No. Ass'n, *Detailed Functional and Interface Specification for the NENA i3 Solution – Stage 3*, NENA 08-003 Version 1 (June 14, 2011), available at [https://cdn.ymaws.com/www.nena.org/resource/resmgr/standards-archived/08-003\\_detailed\\_functional\\_a.pdf](https://cdn.ymaws.com/www.nena.org/resource/resmgr/standards-archived/08-003_detailed_functional_a.pdf).