

**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. 18**

Request No: 18
Directed to: Public Counsel
Date Received: February 18, 2022
Date Produced: March 7, 2022
Prepared by: Brian Rosen
Witnesses: Brian Rosen

DATA REQUEST NO. 18.

In response to CTL-15(b)-(c), you interpreted the contract as holding CenturyLink responsible for providing certain 911 functionality in the state of Washington. Identify each and every provision of the contract and/or contract amendments that you believe support your response to CTL-15(b)-(c).

RESPONSE:

As cited in Public Counsel's response to CenturyLink's Data Request 15(b) and (c), Public Counsel relied on the Washington State Military Department Contract E09-196 at page 14, requiring CenturyLink to provide "network, transport, PSAP interfaces, 911 trunk support, selective routing and ALI interfaces. The system must be scalable, affordable, reliable, redundant, and capable of resolving the limitations of the current legacy system." Amendment M to the contract relieved CenturyLink from selective routing and ALI interfaces.