

**BEFORE THE WASHINGTON
UTILITIES & TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,

Complainant,

v.

CENTURYLINK COMMUNICATIONS, LLC,

Respondent.

DOCKET UT-181051

BRIAN ROSEN

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

Exhibit BR-16C

Comtech Confidential Response to Public Counsel Data Request No. 3
(Revised September 16, 2021)

December 15, 2021

**Shaded Information is Designated Confidential
per Protective Order in Docket UT-181051**

5 & 7956, 21

CONFIDENTIAL PER PROTECTIVE ORDER IN DOCKET NO. UT-181051
UTC v. CenturyLink, Docket UT-181051
TeleCommunication System, Inc.'s Response to PC Data Request Nos. 1-9 (REVISED)
September 16, 2021

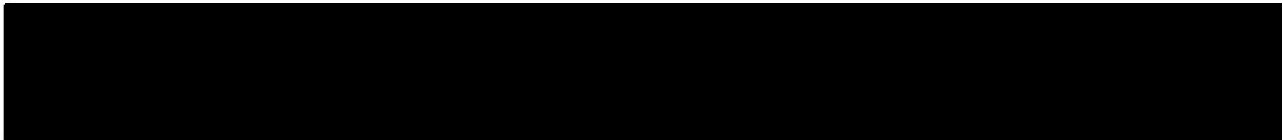
PC3. Usually, NGCS vendors use multiple suppliers for critical 9-1-1 services.

RESPONSE:

TSYS does not agree with this statement. Supplier diversity is rarely utilized when the NGCS vendor is also a facilities-based carrier, such as CenturyLink or AT&T. Supplier diversity, in fact, may create additional risks because an NGCS provider cannot be certain if multiple suppliers actually share a physical path. Based on TSYS's experience, underlying circuit suppliers often share a physical path at some point in their networks.

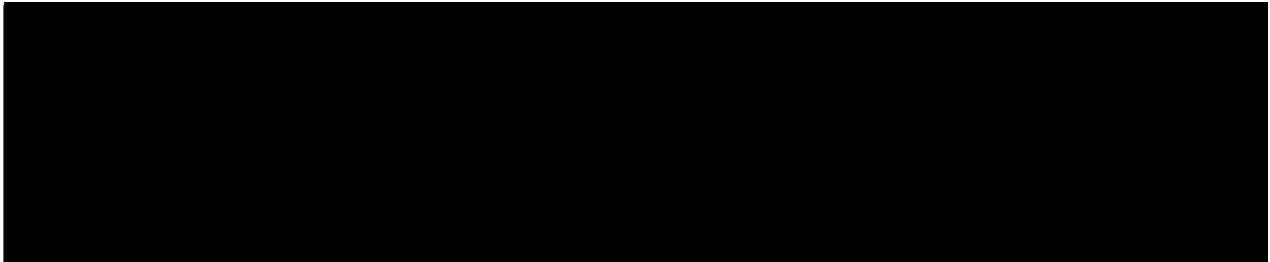
a. Why were both DS-3s ordered from CenturyLink?

RESPONSE:



b. Were other suppliers available? If so, why were they not used?

RESPONSE:



**Respondents for PC3: Susan Ornstein, Senior Director, Legal & Regulatory Affairs
Todd Poremba, Vice President, Product Management**