

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION STAFF  
RESPONSES TO DATA REQUESTS

DATE PREPARED: September 22, 2022

WITNESS: Commission Staff

DOCKET: UT-181051

RESPONDER: Commission Staff

REQUESTER: CenturyLink

**CENTURYLINK DATA REQUEST NO. 39:**

At page 7 of his Cross Answer Testimony, Mr. Webber testifies that “[t]hese four specific circuits had the intent and effect of creating geographic redundancy and diversity in the signaling paths of the TSYS ESInet II system.” On page 8 of his Cross Answer Testimony, Mr. Webber testifies that “[i]t does not appear that the circuits shared a single physical point of failure, which is a key criterion cited by the [FCC] for route diversity for public safety purposes...”

Please refer to CLC’s response to Staff data request 57C, in which CLC indicates that multiple of Comtech’s SS7 links “mux up to an OC 192 with the SCID Code of NTCM12.” Aware of CLC’s response to Staff data request 57C, on what basis does Mr. Webber conclude that the Comtech SS7 links were physically diverse and lacked a single physical point of failure”? Identify all facts and produce all documents supporting your response.

**RESPONSE:**

Staff objects to this request as overbroad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence, and/or not proportionate to the needs of the case. Staff further objects on the basis that the material sought by the request is: (a) not in Staff’s possession, custody, or control; (b) already in the Company’s possession, custody, or control; (c) publicly available; and/or (d) obtainable from some other source that is more convenient, less burdensome, or less expensive. Staff further objects to this request to the extent it requests more than is required by the Commission’s rules and orders. Staff further objects to this data request to the extent that the information it seeks is protected by attorney client privilege and/or the work product doctrine. Staff further objects to this request to the extent that it is beyond the scope of Witness Webber’s testimonies.

Without waving the above objections, Staff responds as follows:

Witness Webber’s findings and opinions on the diversity of TSYS’ SS7 links are provided in his testimonies. *See* Witness Webber’s December 15, 2021 prefiled Direct Testimony (Webber, Exh. JDW-1CT at 38:1 - 43:27) and August 31, 2022 Cross-Answering Testimony (Webber, Exh. JDW-33CT at 5:20 - 15:10).