

**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. 24**

Request No: 24
Directed to: Public Counsel
Date Received: September 23, 2022
Date Produced: October 7, 2022
Prepared by: Brian Rosen
Witnesses: Brian Rosen

DATA REQUEST NO. 24.

Mr. Rosen asserts that additional complexity and risk was introduced due to the need to convert traffic from IP to TDM and TDM to IP. Approximately what percentage of traffic (or if you prefer volume of traffic in millions of MOUs) in the United States is converted from IP to TDM or TDM to IP on a daily basis?

RESPONSE:

Mr. Rosen has no information on the number of such conversions. Based on his experience, Mr. Rosen asserts that in highly available systems such as 9-1-1 systems, availability is decreased by every piece of equipment in the path. Good practice minimizes any form of conversions as they add complexity and decreases availability. The fact that some function is known to be reliable does not detract from the engineering advisability of minimizing conversions of any kind as well as minimizing the number of functions and pieces of equipment. The formulas for predicted reliability sum failure probabilities. One can never improve availability by adding complexity, it can only decrease availability.