EXH. SET-4R Docket UT-181051

Witness: Steven E. Turner

WUTC DOCKET: 181051 EXHIBIT: SET-4C (R) ADMIT ☑ W/D ☐ REJECT ☐

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,

DOCKET UT- 181051

Complainant,

v.

CENTURYLINK COMMUNICATIONS, LLC,

Respondent.

EXHIBIT TO TESTIMONY OF

STEVEN E. TURNER

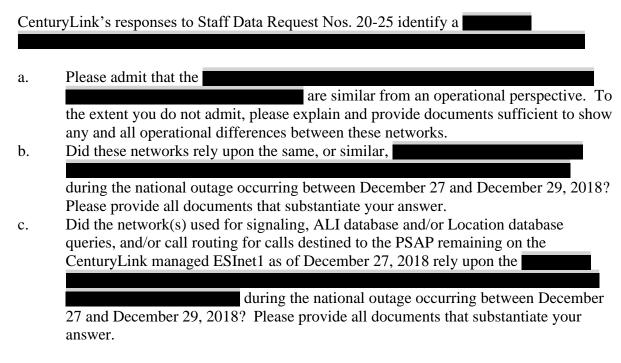
ON BEHALF OF CENTURYLINK COMMUNICATIONS, LLC

CLC RESPONSE TO STAFF DATA REQUEST 27(C)

March 31, 2022

Dockets UT-181051 CenturyLink Responses to UTC Staff Data Request Nos. 26-34 – CONFIDENTIAL November 11, 2021 Page 3

UTC STAFF DATA REQUEST NO. 27:



RESPONSE:

CLC objects to this data request on the grounds that it is overly broad and unduly burdensome. CLC further objects to this data request on the grounds that it is not reasonably calculated to lead to the discovery of admissible evidence. This data request seeks to investigate an outage on CLC's national transport network. The outage did not directly affect CLC's or its affiliates' remaining 911 network in Washington. Instead, it affected CLC's national transport network. More specifically, the outage affected *interstate DS-3 circuits* purchased by a vendor of Comtech on behalf of Comtech (for the provision of SS7 functionality), the responsible Washington 911 provider for the PSAPs that experienced a 911 outage. The interstate and non-regulated services provided on CLC's national transport network, and the facilities utilized to provide such services, are not regulated by the Commission, and the Commission lacks jurisdiction over them. In Re AT&T Commc'ns of the Pac. Nw., No. 04, 2003 WL 23341214 (Wash. U.T.C. Dec. 1, 2003) ("AT&T's proposed language would encompass facilities-access purchased out of federal tariffs over which the Commission lacks jurisdiction.") (citing 34th Supplemental Order; Order Regarding Qwest's Demonstration of Compliance with Commission Orders, Investigation Into U S WEST Communications, Inc.'s Compliance With Section 271 of the Telecommunications Act of 1996; U S WEST Communications, Inc.'s Statement of Generally Available Terms Pursuant to Section 252(f) of the Telecommunications Act of 1996, Dkt. Nos. UT-003022, UT-003040, ¶ 22 (May 2002)); MilleniaNet Corp. v. Pennsylvania Pub. Util. Comm'n, No. 990 C.D. 2008, 2009 WL 9104922 (Pa. Commw. Ct. Apr. 30, 2009) (complaint

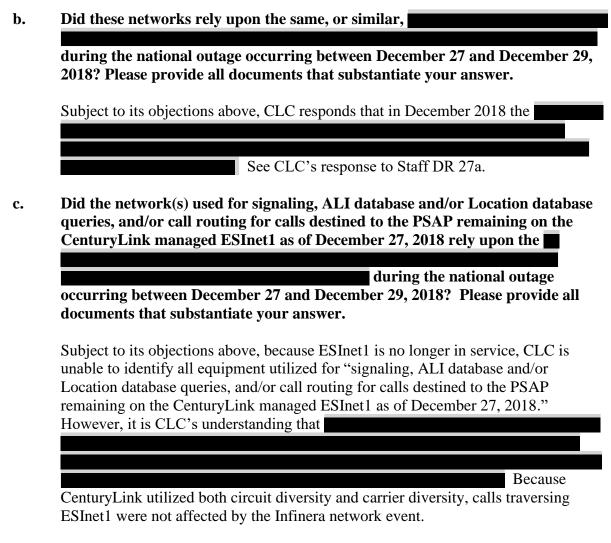
CONFIDENTIAL PER PROTECTIVE ORDER

Dockets UT-181051 CenturyLink Responses to UTC Staff Data Request Nos. 26-34 – CONFIDENTIAL November 11, 2021 Page 4

dismissed because the "the PUC does not have jurisdiction over interstate telecommunications services."). Without waiving its objections, CLC responds as follows.

perspective. To the extent	you do not admit, please explain and provide
	ow any and all operational differences between
networks.	•
Subject to its objections above	ve, CLC denies that the "
by "similar from an operation	perspective." While Staff is not precise in what is and perspective," the two networks were (as of
December 27, 2018) operation	onally different in meaningful ways.

Dockets UT-181051 CenturyLink Responses to UTC Staff Data Request Nos. 26-34 – CONFIDENTIAL November 11, 2021 Page 5



Respondent: CenturyLink Legal

Morgan Pofahl, Principal Network Engineer Drew Groff, Director NOC Compliance Carl Klein, Manager Public Safety Services