**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. 19**

Request No:	19
Directed to:	Public Counsel
Date Received:	September 23, 2022
Date Produced:	October 7, 2022
Prepared by:	Brian Rosen
Witnesses:	Brian Rosen

DATA REQUEST NO. 19.
At page 2 (lines 4-6) of his Cross-Answering Testimony, Mr. Rosen asserts that SS7 "is not commonly used in [NG911] systems other than in the [OSP] interconnect." Identify and produce all data, industry reports, literature or other written guidance supporting Mr. Rosen's assertion.

RESPONSE:
Mr. Rosen's assertion is based on his professional experience. He has worked on four state-wide NG9-1-1 projects (Wisconsin, Maine, Vermont, Indiana) and is directly familiar with at least 10 others (including California, Alabama, Ohio, Pennsylvania, North Carolina, Arizona, and Connecticut). He co-chairs the National Emergency Number Association (NENA) technical standards work group, the NENA i3 Architecture Working Group, which developed the NG9-1-1 base technical standard. Mr. Rosen is in regular contact with all major vendors of NG9-1-1 systems, and knows how NG9-1-1 is being deployed across the country. None of these systems use SS7 in any way other than connecting to Originating Service Providers (OSPs). The NENA technical standard NENA-STA-010 does not support any use of SS7 other than in Legacy Network Gateways and Legacy Selective Router Gateways. NENA-INF-003.1-2013 (2013) describes potential demarcation points within NG9-1-1 systems, and only describes connections to Legacy Network Gateways and Legacy Selective Router Gateways as being appropriate SS7 demarcation points.