

**Exh. JDW-24**  
**Docket UT-181051**  
**Witness: James D. Webber**

**BEFORE THE WASHINGTON  
UTILITIES AND TRANSPORTATION COMMISSION**

**WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION,**

**Complainant,**

**v.**

**CENTURYLINK  
COMMUNICATIONS, LLC.,**

**Respondent.**

**DOCKET UT-181051**

**EXHIBIT TO  
TESTIMONY OF**

**JAMES D. WEBBER**

**ON BEHALF OF STAFF OF  
WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION**

*CenturyLink Responses to Consumer Protection Investigation Data Requests*

**December 15, 2021**

**CENTURYLINK**  
1600 7th Avenue, Room 1506  
Seattle, Washington 98191  
(206) 345-6224  
(425) 301-8411 (cell)  
Email: [phil.grate@centurylink.com](mailto:phil.grate@centurylink.com)

**Philip E. Grate**  
Government Affairs Director

January 30, 2019

*Transmitted Via Email Only*

Susie Paul  
Compliance Investigations  
Washington Utilities and Transportation Commission  
1300 S Evergreen Park Dr. SW  
Olympia, Washington 98504

Dear Ms. Paul:

This letter responds to a January 17, 2019 letter from Mark Johnson, the WUTC's Executive Director and Secretary, to me proffering seven information requests on CenturyLink Communications LLC ("CLC") concerning a December 27, 2018 emergency 911 call dispatch systems failure that caused outages throughout the state of Washington.

The following is a general response that is part of the response for the first six questions :

Beginning in the early morning of December 27, 2018, CenturyLink experienced a network event impacting a national transport network operated by CLC. The incident impacted voice (primarily voice over internet protocol), other internet protocol-based services, and transport services for some CenturyLink customers in various parts of the country, including Washington. The event also impacted CenturyLink's visibility into our network management system, impairing our ability to troubleshoot and prolonging the duration of the outage. The outage was caused by a third-party equipment vendor's faulty network management card that triggered invalid traffic replication. Affected services began to restore on December 28, and the network traffic had normalized as of December 29. Steps have been taken to help prevent the issue from reoccurring.

For your reference, CenturyLink's Reason for Outage ("RFO") dated December 31, 2018 is attached as Confidential Attachment A. A public summary version of the RFO is included as Attachment B.

To be clear, the event did not cause a nationwide outage involving CenturyLink's 911 service or a CenturyLink 911 service related outage in Washington for those Public Safety Answering Points ("PSAPs") served by CenturyLink. During 2018 most Washington PSAPs had their respective 911 Service transferred from CenturyLink to Comtech. As of December 27, 2018, CenturyLink no longer provided 911 service to the following Washington PSAPs:

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- RiverCom 911
- WHITCOM 911 Emergency Center
- Columbia County Public Safety Communications
- Lewis County 911
- Okanogan County Sheriff's Office
- Pend Oreille County 911
- Lincoln County Sheriff's Office
- Adams County Communications Center
- Garfield County Sheriff's Office (WESCOM)
- King County Test PSAP
- University of Washington Police Department
- Joint Base Lewis McChord (JBLM)
- WSP - Wenatchee
- Bothell Police Dept.
- Issaquah Police Department
- Enumclaw Police Department
- Seattle Police Dept.
- Skamania County Sheriff's Office
- Redmond Police Dept.
- Ferry County E911
- WSP - Bellevue
- WSP - Marysville
- Kitsap County Central Communications (CENCOM)
- San Juan County Sheriff's Office
- Kittitas County 911 (KITTCOM)
- Walla Walla Emergency Services Communications Center (WESCOM)
- WSP - Spokane
- "South Sound 911, SS911 Eastside (fka Puyallup Comm), Tacoma Fire"
- Southeast Communications Center (SECOMM) (Benton)
- WSP - Yakima
- Port of Seattle Police/Fire Communications
- Skagit 911 Center
- TCOMM 911
- Clark Regional Emergency Services Agency
- Wahkiakum County Sheriff's Office
- Yakima Public Safety Communications Center (SUNCOM)
- Seattle Fire Dept.
- WSP - Vancouver
- Cowlitz County 911 Center
- WSP - Tacoma
- Pacific County Sheriff's Office Communications

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- Grays Harbor E911 Communications
- Peninsula Communications
- JEFFCOM 911 Communications
- Island County Emergency Services Communications Center (I-COM 911)
- WSP - Bremerton
- Mason County Emergency Communications (MACECOM)

On December 27, 2018, CenturyLink still provided 911 service to the following Washington PSAPs:

- Klickitat Sheriff's Office 911 Center
- Northeast King County Regional Public Safety Communications Agency
- Valley Communications Center (Valley-Com)
- Puyallup Communications South Sound 911 - FireCom
- Whatcom County Communications Center
- Spokane County 911 Emergency Communications Backup
- Stevens County 911
- Spokane County 911 Emergency Communications
- Fairchild Air Force Base FD
- Colville Tribal Police Department
- Yakima County (SUNCOM) Backup
- King County Sheriff's Office
- Multi Agency Communications Center (MACC) - Grant
- SNOAC911
- SNOCOM 911

Where CenturyLink is an emergency 911 service provider and voice services were functioning, we are not aware of any 911 service impacts in Washington during the event.

In addition to this information, the following is being provided in response to Staff's information requests:

CP1: The number of Washington affected customers, identified by customer type (commercial or residential) and CenturyLink services affected.

Response: No CenturyLink services under the WUTC's jurisdiction, including CenturyLink's 911 service, were affected.

CP2: A chronology of all internal communications related to the outage, including summaries of telephone calls and copies of any emails or other written correspondence.

Response: Not applicable. CenturyLink is not aware of any 911 service outages in Washington experienced by any entities to which it provided 911 service during the incident.

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CP3: A chronology of all communications with stakeholders related to the outages (such as commission staff, other federal, state, county, and local governments), including summaries of telephone calls and copies of any emails or other written correspondence.

Response: Not applicable. CenturyLink is not aware of any 911 service outages in Washington experienced by any entities to which it provided 911 service during the incident.

CP4: A chronology of service restoral by location, number of customers, and service type.

Response: Not applicable. CenturyLink is not aware of any 911 service outages in Washington experienced by any entities to which it provided 911 service during the incident.

CP5: Please provide a copy of CenturyLink's communication plan. Was the communication plan followed during this outage?

Response: Please see the attached CenturyLink Communications Plans to which CenturyLink and Staff stipulated in Docket UT-132234. The second question is not applicable. CenturyLink is not aware of any 911 service outages in Washington experienced by any entities to which it provided 911 service during the incident.

CP6: Please provide a summary of any credits for the outage that were/will be provided.

Response: Not applicable. CenturyLink is not aware of any 911 service outages in Washington experienced by any entities to which it provided 911 service during the incident.

CP7: The name, title, telephone number, and email address of the contact person whom our staff can work with directly for questions that may arise concerning any details of the information provided.

Response: Phil Grate, Director State Government Affairs, 206-345-6224,  
Phil.grate@CenturyLink.com.

Our investigation into the event is ongoing. Should CenturyLink learn additional information, we will supplement this response.

Sincerely,



Philip E. Grate

PEG/jga

**CENTURYLINK**  
1600 7th Avenue, Room 1506  
Seattle, Washington 98191  
(206) 345-6224  
(425) 301-8411 (cell)  
Email: [phil.grate@centurylink.com](mailto:phil.grate@centurylink.com)

**Philip E. Grate**  
Government Affairs Director

DATE January 9, 2020

*Emailed*

Jacque Hawkins-Jones  
lead compliance investigator  
Washington Utilities and Transportation Commission  
Hawkins-Jones, Jacque (UTC) [jacque.hawkins-jones@utc.wa.gov](mailto:jacque.hawkins-jones@utc.wa.gov)

Re: UT-181051

Ms. Hawkins-Jones:

Following are responses to CP1 through CP7 that you emailed me December 17, 2019 in connection with UT-181051.

CP1: Please provide the number of Washington customers, identified by customer type (commercial or residential), serviced by the 15 PSAPs identified in CenturyLink's response letter to consumer protection data request 1, who were affected by the December 27, 2018, outage.

**Response:** No CenturyLink services under the WUTC's jurisdiction, including CenturyLink's 911 service, were affected.

CP2: Please provide the number of Washington 911 calls that were not completed to each of the 15 identified PSAPs during this outage. If CenturyLink is unable to provide this information, please explain in detail why not and if any other entity or company has this data.

**Response:** None.

CP3: A chronology of all internal communications related to the December 27, 2018, outage, including summaries of telephone calls and copies of any emails or other written correspondence. Please include all emails and documentation referencing Master Ticket MC790244.

**Response:** Not applicable. CenturyLink is not aware of any 911 service outages in Washington experienced by any entities to which it provided 911 service during the incident.

CP4: A chronology of all communications with stakeholders related to the December outage (such as commission staff, other federal, state, county, and local governments),

including summaries of telephone calls and copies of any emails or other written correspondence.

**Response:** Not applicable. CenturyLink is not aware of any 911 service outages in Washington experienced by any entities to which it provided 911 service during the incident.

CP5: A chronology of service restoral by location, number of customers, and service type, including the 15 identified PSAPs.

**Response:** Not applicable. CenturyLink is not aware of any 911 service outages in Washington experienced by any entities to which it provided 911 service during the incident.

CP6: Please provide documentation, including any emails, showing CenturyLink met the communication plan, provided in its response to consumer protection data request 1. Please include notification and all communication sent to the 15 identified PSAPs during this outage.

**Response:** Please see the attached CenturyLink Communications Plans to which CenturyLink and Staff stipulated in Docket UT-132234. The second question is not applicable. CenturyLink is not aware of any 911 service outages in Washington experienced by any entities to which it provided 911 service during the incident.

CP7: Please provide a color-coded diagram that shows the Washington state 911 network on December 26, 2018 (Phase 1) and another that shows the Washington 911 network as it exists today (Phase 3).

**Response:** Please see the attached file labeled "WA Comtech NG911 Transition.pptx." It contains diagrams prepared by Comtech to explain the transition of the 911 network. On December 26, 2018, the Washington state 911 network was as shown on the third slide, denoted "Step 2." Slide 9, denoted "Step 9" portrays the Washington 911 network as it exists today.

Kindest Regards,

A handwritten signature in black ink that reads "Philip E. Grate". The signature is written in a cursive style with a long horizontal stroke at the end.

Philip E. Grate

**From:** [Grate, Phil](#)  
**To:** [Hawkins-Jones, Jacque \(UTC\)](#)  
**Subject:** RE: CenturyLink UT-181051 Data Request CP2  
**Date:** Thursday, January 23, 2020 11:05:23 AM  
**Attachments:** [image001.png](#)  
[Response to Consumer Protection Data Request Follow up 15 Jan 2020.pdf](#)

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Ms. Hawkins-Jones,

Attached are CenturyLink's responses to the follow up questions you emailed me January 15, 2020.

Kindest regards,

Phil Grate

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**From:** Grate, Phil  
**Sent:** Wednesday, January 15, 2020 10:30 AM  
**To:** 'Hawkins-Jones, Jacque (UTC)' <[jacque.hawkins-jones@utc.wa.gov](mailto:jacque.hawkins-jones@utc.wa.gov)>  
**Subject:** RE: CenturyLink UT-181051 Data Request CP2

Acknowledging receipt.

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**From:** Hawkins-Jones, Jacque (UTC) <[jacque.hawkins-jones@utc.wa.gov](mailto:jacque.hawkins-jones@utc.wa.gov)>  
**Sent:** Wednesday, January 15, 2020 9:02 AM  
**To:** Grate, Phil <[Phil.Grate@CenturyLink.com](mailto:Phil.Grate@CenturyLink.com)>  
**Subject:** RE: CenturyLink UT-181051 Data Request CP2

Good Morning Phil,

After reviewing the responses, I have a few follow-up questions. Please see below and provide your response by close of business January 23.

CP1: Please provide the number of Washington customers, identified by customer type (commercial or residential), serviced by the 15 PSAPs identified in CenturyLink's response letter to consumer protection data request 1, who were affected by the December 27, 2018, outage.

CTL Response CP1: No CenturyLink services under the WUTC's jurisdiction, including CenturyLink's 911 service, were affected.

**Follow-up CP1:**

CP1.1 - Does CenturyLink know how many of their own customers were affected by the December 27, 2018, outage?

CP1.2 – Please provide a list of services that were affected during the December 27, 2018, outage.



CP2: Please provide the number of Washington 911 calls that were not completed to each of the 15 identified PSAPs during this outage. If CenturyLink is unable to provide this information, please explain in detail why not and if any other entity or company has this data.

CTL Response CP2: None.

**Follow-up CP2:** Please expand on your response.

CP3: A chronology of all internal communications related to the December 27, 2018, outage, including summaries of telephone calls and copies of any emails or other written correspondence. Please include all emails and documentation referencing Master Ticket MC790244.

CTL Response CP3: Not applicable. CenturyLink is not aware of any 911 service outages in Washington experienced by any entities to which it provided 911 service during the incident.

**Follow-up CP3:** Please provide all emails and communication referencing Master Ticket MC790244.

Thank you for your attention to this matter,

**Jacque Hawkins-Jones**

(360) 664-1105

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**From:** Grate, Phil [<mailto:Phil.Grate@CenturyLink.com>]  
**Sent:** Thursday, January 9, 2020 11:53 AM  
**To:** Hawkins-Jones, Jacque (UTC) <[jacque.hawkins-jones@utc.wa.gov](mailto:jacque.hawkins-jones@utc.wa.gov)>  
**Subject:** RE: CenturyLink UT-181051 Data Request CP2

Good morning, Ms. Hawkins-Jones.

Attached is CenturyLink's response to your information request email to me December 17, 2019.

Kindest Regards,

Phil Grate

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**From:** Grate, Phil  
**Sent:** Tuesday, December 17, 2019 1:13 PM  
**To:** 'Hawkins-Jones, Jacque (UTC)' <[jacque.hawkins-jones@utc.wa.gov](mailto:jacque.hawkins-jones@utc.wa.gov)>  
**Subject:** RE: CenturyLink UT-181051 Data Request CP2

Acknowledging receipt.

Phil

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**From:** Hawkins-Jones, Jacque (UTC) <[jacque.hawkins-jones@utc.wa.gov](mailto:jacque.hawkins-jones@utc.wa.gov)>  
**Sent:** Tuesday, December 17, 2019 12:32 PM  
**To:** Grate, Phil <[Phil.Grate@CenturyLink.com](mailto:Phil.Grate@CenturyLink.com)>  
**Subject:** CenturyLink UT-181051 Data Request CP2

Good Afternoon Mr. Grate,

My name is Jacque Hawkins-Jones and I am the new lead compliance investigator at the Utilities and Transportation Commission. Susie Paul left the Commission in July for a new position at another state agency and I have taken over her cases.

I have had a chance to review the documents CenturyLink has provided in response to all data requests into this investigation. Please find below additional requests from the Consumer Protection division.

Please provide all requested information no later than close of business **January 10, 2020**, in electronic format using Microsoft Word for narrative documents and Excel for data. A request for extension must be made in writing prior to the deadline and must include the reason for the extension.

CP1: Please provide the number of Washington customers, identified by customer type (commercial or residential), serviced by the 15 PSAPs identified in CenturyLink's response letter to consumer protection data request 1, who were affected by the December 27, 2018, outage.

CP2: Please provide the number of Washington 911 calls that were not completed to each of the 15 identified PSAPs during this outage.  
If CenturyLink is unable to provide this information, please explain in detail why not and if any other entity or company has this data.

CP3: A chronology of all internal communications related to the December 27, 2018, outage, including summaries of telephone calls and copies of any emails or other written correspondence. Please include all emails and documentation referencing Master Ticket MC790244.

CP4: A chronology of all communications with stakeholders related to the December outage (such as commission staff, other federal, state, county, and local governments), including summaries of telephone calls and copies of any emails or other written correspondence.

CP5: A chronology of service restoral by location, number of customers, and service type, including the 15 identified PSAPs.

CP6: Please provide documentation, including any emails, showing CenturyLink met the communication plan, provided in its response to consumer protection data request 1. Please include notification and all communication sent to the 15 identified PSAPs during this outage.

CP7: Please provide a color coded diagram that shows the Washington state 911

network on December 26, 2018 (Phase 1) and another that shows the Washington 911 network as it exists today (Phase 3).

I am available if you have any questions. My contact information is below.

Thank you,

**Jacque Hawkins-Jones**

Compliance Investigator, Consumer Protection

(360) 664-1105 Office

[Jacque.Hawkins-Jones@utc.wa.gov](mailto:Jacque.Hawkins-Jones@utc.wa.gov)



This email/letter states the informal opinions of commission staff, offered as technical assistance, and are not intended as legal advice. We reserve the right to amend these opinions should circumstances change or additional information be brought to our attention. Staff's opinions are not binding on the commission.

This communication is the property of CenturyLink and may contain confidential or privileged information. Unauthorized use of this communication is strictly prohibited and may be unlawful. If you have received this communication in error, please immediately notify the sender by reply e-mail and destroy all copies of the communication and any attachments.

This communication is the property of CenturyLink and may contain confidential or privileged information. Unauthorized use of this communication is strictly prohibited and may be unlawful. If you have received this communication in error, please immediately notify the sender by reply e-mail and destroy all copies of the communication and any attachments.

**CenturyLink responses to follow-up questions from WUTC Consumer Protection Investigator Jacque Hawkins-Jones.**

CP1: Please provide the number of Washington customers, identified by customer type (commercial or residential), serviced by the 15 PSAPs identified in CenturyLink's response letter to consumer protection data request 1, who were affected by the December 27, 2018, outage.

*Clarified CTL Response CP1 (01/23/2020):* No CenturyLink customers served by the 15 - identified PSAP for 911 service were affected.

**Follow-up CP1:**

CP1.1 - Does CenturyLink know how many of their own customers were affected by the December 27, 2018, outage?

**RESPONSE:**

Yes, CenturyLink knows that no CenturyLink customers served by the 15 PSAPS identified in CenturyLink's response letter to Consumer Protection data request 1 (which Susie Paul submitted to Phil Grate on January 17, 2019) experienced a 911 system outage. CenturyLink does not know how many of its Washington customers may have been affected by long distance network congestion described in our response to CP1.2 below.

**RESPONDENT:** Phil Grate

CP1.2 – Please provide a list of services that were affected during the December 27, 2018, outage.

**RESPONSE:**

CenturyLink objects to this data request as overbroad and seeking information that is not within the jurisdiction of the Commission. This includes interstate services, and non-telecom services such as IP based services. Without waiver of this objection, CenturyLink provides the response below.

There were impacts to CenturyLink non-emergency services in Washington as a result of the December 27-29, 2018 network event. Long distance services in Washington were subject to network congestion for approximately 21 hours during the event. Importantly, this network congestion was intermittent and did not impact all calls or areas within the state. Affected customers would have experienced a fast busy or static signal.

Customers of CenturyLink transport services located in Washington may have also been affected by this event depending on several factors including, but not limited to, network design.

**RESPONDENT:** Jeanne Stockman

CP2: Please provide the number of Washington 911 calls that were not completed to each of the 15 identified PSAPs during this outage. If CenturyLink is unable to provide this information, please explain in detail why not and if any other entity or company has this data.

CTL Response CP2: None.

**Follow-up CP2:** Please expand on your response.

**RESPONSE:**

The outage did not affect CenturyLink's local telephone network or the 15 PSAPs served by CenturyLink. CenturyLink customers served by the other NG911 provider in Washington were likely affected. Information about those effects should be provided by the other NG911 provider.

**RESPONDENT:** Phil Grate

CP3: A chronology of all internal communications related to the December 27, 2018, outage, including summaries of telephone calls and copies of any emails or other written correspondence. Please include all emails and documentation referencing Master Ticket MC790244.

**Follow-up CP3:** Please provide all emails and communication referencing Master Ticket MC790244.

**RESPONSE:**

CenturyLink objects to this data request on the grounds that it is overbroad, unduly burdensome and not calculated to lead to the discovery of admissible evidence. Without waiver of this objection, CenturyLink provides the response below.

**RESPONDENT:** Lisa Anderl, Assistant General Counsel, CenturyLink Law Department

Master Ticket MC790244 was opened by Intrado to notify CenturyLink of outages in 911 systems served by Intrado. There was no 911 system outage for the 15 Washington PSAPs still served by CenturyLink and Intrado during the December 27, 2018 outage. Hence, it is highly unlikely any of the telephone calls, emails or other written correspondence regarding Master Ticket MC790244 would pertain to Washington.

CenturyLink does not retain emails and communications in such a way that they can be readily associated with a Master Ticket number. It follows that collecting all emails and documentation referencing Master Ticket MC790244 would require a burdensome special study. Such a study would require a manual effort (through emails, phone calls and interviews) to identify which of CenturyLink's employees communicated about Master Ticket

MC790244. The employees so identified would be obliged to search their own emails and records to verify whether they retain any emails or other communications about Master Ticket MC790244 and to collect and provide them to an employee tasked with collecting and compiling the emails and communications. The cost in lost productive employee time of such an undertaking would be substantial.

If answered, this request would be unlikely to provide pertinent, relevant information about CenturyLink's 911 service in Washington during the December 27, 2018 outage but would most certainly impose substantial cost on CenturyLink.

**RESPONDENT:** Phil Grate