

**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. 45**

Request No: 45
Directed to: Public Counsel
Date Received: September 23, 2022
Date Produced: October 7, 2022
Prepared by: Brian Rosen
Witnesses: Brian Rosen

DATA REQUEST NO. 45.

At pages 22-23 of his Cross-Answering Testimony, Mr. Rosen asserts that, notwithstanding Amendment M to the WMD-CenturyLink contract, CenturyLink was “still responsible for the network and transport at the time of the outage.”

- a. Does Mr. Rosen believe that CLC would have been responsible (both for purposes of its obligations to WMD and its obligations under the statutes and rules cited in the complaint) if in December 2018 a 911 call destined for a Comtech PSAP failed because of a failure on the transport facilities connecting the Comtech gateway and the Comtech PSAP? If your answer is other than no, fully explain your response.
- b. If, after becoming aware of Sprint’s discontinuation of service in 2017, Comtech had migrated all 4 SS7 links to AT&T, does Mr. Rosen believe that CLC would have been responsible (both for purposes of its obligations to WMD and its obligations under the statutes and rules cited in the complaint) if in December 2018 a 911 call destined for a Comtech PSAP failed because of a failure on AT&T’s transport network? If your answer is other than no, fully explain your response.

RESPONSE:

Yes. The original contract makes CenturyLink responsible for network and transport as well as routing and ALI services. Amendment M defines when CenturyLink’s responsibility for routing and ALI service transitions, but does not say that CenturyLink’s responsibility for network and transport transitions. Mr. Rosen is not a lawyer and cannot offer a legal interpretation, but as an engineer, and subject matter expert, he believes that CenturyLink was responsible for network and transport for all calls regardless of what facilities a failure occurred and regardless of what vendors were involved.