

**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. 29**

Request No: 29
Directed to: Public Counsel
Date Received: September 23, 2022
Date Produced: October 7, 2022
Prepared by: Brian Rosen
Witnesses: Brian Rosen

DATA REQUEST NO. 29.

At page 9 (lines 16-17) of his Cross-Answering Testimony, Mr. Rosen asserts that “[g]eographic diversity was not a factor in this incident.” At page 14 (line 24) to page 15 (line 1), Mr. Rosen asserts that “[w]e do not know if there was geographic diversity, but we know Comtech did not request it.”

- a. How does Mr. Rosen know that geographic diversity was not a factor if he does not know if Comtech had geographic diversity? Fully explain your response.
- b. Would Mr. Rosen consider that Comtech had had geographic diversity if all of four of its SS7 links rode the same OC-192? Fully explain your response.

RESPONSE:

- a. Geographic diversity was not a factor in this incident because multiple switches failed. If they were all in the same fiber or in four widely dispersed fibers, it does not matter because multiple switches failed.
- b. Mr. Rosen would not consider all four links in the same OC-192 to be geographically diverse. They are in the same physical optical cable, and thus must follow the same geospatial path.