

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION STAFF
RESPONSES TO DATA REQUESTS

DATE PREPARED: September 22, 2022

WITNESS: Commission Staff

DOCKET: UT-181051

RESPONDER: Commission Staff

REQUESTER: CenturyLink

CENTURYLINK DATA REQUEST NO. 40:

At page 9 (lines 10-16) of his Cross Answer Testimony, Mr. Webber refers to Comtech's alleged desire for ESInet1 and ESInet2 to be interconnected via SIGTRAN IP instead of TDM/SS7. Mr. Webber states "[h]ad CenturyLink agreed to implement the initial proposal, as requested by TSYS [Comtech], it is highly unlikely that 911 services in Washington would have been impacted by the December 2018 outage on the CenturyLink's Green network."

Does Mr. Webber likewise believe that, if Comtech had accepted TNS' August 2018 proposal to replace two of the CenturyLink TDM SS7 links with TNS' SIGTRAN IPX Connectivity, that is highly unlikely that 911 services in Washington would have been impacted by the December 2018 outage on the CenturyLink's Green network."

RESPONSE:

Staff objects to this request as overbroad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence, and/or not proportionate to the needs of the case. Staff further objects to this request to the extent it requests more than is required by the Commission's rules and orders. Staff further objects that this request would improperly require the creation of new data and/or documents on the part of Staff. *See* WAC 480-07-400(1)(c)(iii). Staff further objects to the data request to the extent that the Company is asserting/assuming the existence of facts. Staff further objects to this request to the extent it seeks speculative and/or hypothetical information. Staff further objects to this request to the extent that it is beyond the scope of Witness Webber's testimonies.