

**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. 44**

Request No: 44
Directed to: Public Counsel
Date Received: September 23, 2022
Date Produced: October 7, 2022
Prepared by: Brian Rosen
Witnesses: Brian Rosen

DATA REQUEST NO. 44.

At pages 22-23 of his Cross-Answering Testimony, Mr. Rosen describes Amendment M to the 2009 contract between WMD and CenturyLink. Does Mr. Rosen contend that, for 911 calls being routed to Comtech-served PSAPs, CenturyLink remained responsible for providing network and transport beyond the Demarcation Point (as that term is referenced in Amendment M)? 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.