

CONFIDENTIAL PER PROTECTIVE ORDER IN DOCKET NO. UT-181051*UTC v. CenturyLink*, Docket UT-181051

TSYS Response to UTC Staff Data Request Nos. 1-2 and 4-6

October 8, 2021

UTC STAFF DATA REQUEST NO. 4:

The following questions are in reference to the Technology Services Contract between TSYS/Comtech and the State E911 Coordinator's Office (SECO)/Washington State Military Department (WMD), as announced on 7/20/16 (see attached Comtech Press Release – Attached as Attachment D).

1. Excluding the documents provided in response to PC DR 3 to SECO/WMD, please provide all contracts and contract amendments between TSYS/Comtech, its parents, affiliates, successors, and assigns and SECO/WMD related to TSYS/Comtech's ESInet II network.

RESPONSE:

TSYS objects to this request as it is overbroad and not reasonably calculated to lead to the discovery of admissible evidence. TSYS conducted a good faith search and has attached the requested agreements as **Attachment 1**, except for the redactions required to protect information that may create a security risk to the 911 system. Please note that TSYS and MIL are in the process of reviewing certain amendments to the Technology Services Contract that were in effect at the time of the December 2018 and will supplement this response as soon as possible.

2. Please provide all contracts between TSYS/Comtech, its parents, affiliates, successors and assigns and CenturyLink, its parents, affiliates, successors, and assigns related to TSYS/Comtech's ESInet II network.

RESPONSE:

Please see the agreements attached hereto at **Attachment 2**.

3. If not already provided in response to subpart b. above, please provide all contract(s) between TSYS/Comtech, its parents, affiliates, successors, and assigns and CenturyLink, its parents, affiliates, successors, and assigns, that governed the provision of ALI services by CenturyLink to TSYS/Comtech during December 2018.

RESPONSE:

TSYS did not have a contract with CenturyLink governing the provision of ALI services during December 2018.

**RESPONDENTS: Susan Ornstein, Senior Director, Legal & Regulatory Affairs
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