

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,

Complainant,

v.

QWEST CORPORATION, d/b/a/
CENTURYLINK QC

Respondent.

CONSOLIDATED DOCKET NOS.:
UT-190262, UT-190263, UT-190264,
UT-190265, and UT-190266

MILITARY'S RESPONSE TO
CENTURYLINK'S AMENDED MOTION
TO WITHDRAW TARIFF FILING AND
DISMISS PROCEEDING

- 1 Pursuant to the Commission's Notice Authorizing Responses to Motion dated November 6, 2019, the Washington State Military Department, E911 Coordination Office (SECO) submits this response to CenturyLink's Amended Motion to Withdraw Tariff Filing and Dismiss Proceeding.
- 2 SECO does not object to the dismissal of the proceeding but has several concerns with the withdrawal.
- 3 CenturyLink's filing to revise its tariff to remove the private switch/automatic location identification (PS/ALI) service during the transition of the ESInet from CenturyLink to Comtech has caused considerable chaos and confusion among its customers. It has required additional work and expenditure of resources for SECO, which is already expending many of its resources in the transition. If CenturyLink's motion is granted then CenturyLink should be prevented from filing any new actions relating to the PS/ALI service until transition to the ESInet II is fully accomplished by all entities.
- 4 Further, there continues to be confusion about when and how CenturyLink's PS/ALI customers are to transition to a new PS/ALI provider. The Washington State Attorney General's Office (AGO) is a customer of CenturyLink's managed

telephone service, in which PS/ALI is a bundled service. The AGO has been told that CenturyLink will transition the AGO's PS/ALI service to a new provider but has received numerous communications extending the transition date and has not yet accomplished it. CenturyLink's representative appears to be unclear about how and when it will transition the service. See attached Declaration of Richard Griffith, Chief Information Officer. If its representatives are unclear about how to accomplish the transition of the PS/ALI service, it is likely to be equally confusing for other commercial customers that do not have a managed service to assist them. Therefore, if CenturyLink's motion is granted, CenturyLink should be required to notify its customers that CenturyLink intends to continue offering the service at its current tariff rate and that they do not need to find a new provider.

5 Finally, Comtech granted CenturyLink an exception to its requirement to convert to Comtech's new process for entering and maintaining PS/ALI records, since it appeared, at the time, that CenturyLink would terminate its PS/ALI service. If the tariff revision is withdrawn and CenturyLink continues to offer the service, CenturyLink should be required to convert to Comtech's new process, as the manager of the ALI database.

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6 SECO requests that the Commission include in any order it issues, conditions that address the issues raised above.

DATED this 21st day of November 2019.

ROBERT W. FERGUSON
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DECLARATION OF RICHARD GRIFFITH IN
SUPPORT OF MILITARY'S RESPONSE TO
CENTURYLINK'S MOTION TO WITHDRAW
TARIFF FILING AND DISMISS PROCEEDING

- 1 I am Richard Griffith, the Chief Information Officer for the Attorney General's Office (AGO). Among other things, I am responsible for managing the AGO's Managed Service Contract with CenturyLink for maintenance and operations of the AGO phone system and for providing dial tone and long distance services for a bundled fee. The Managed Service Contract includes the service of "911 Data Base (PS/ALI)."
- 2 On April 30, 2019, I was forwarded a notice, dated April 10, 2019, from the Washington State Military Department (MIL) about PS/ALI Service Provider changes. The notice indicated that CenturyLink has provided MIL and the Washington UTC with notice that they plan to discontinue PS/ALI services in the state of Washington effective May 8, 2019.
- 3 On April 11, 2019, the AGO contacted the CenturyLink managed service provider for perspective on the transition. CenturyLink provided us with confirmation that they were working with Intrado, formerly West Corporation, on a transition strategy and that they would keep the AGO apprised as they determine the specifics. On April 29, 2019, the AGO asked for an update and CenturyLink provided us with a response on April 30, 2019 that they were making every effort to get questions answered and develop next steps.

- 4 On May 1, 2019, CenturyLink provided an update that the PS/ALI service deadline has been pushed to the end of July 2019.
- 5 On May 14, 2019, CenturyLink provided an update that the PS/ALI service would be provided through February 7, 2020. I followed up on November 7, 2019, approximately 90 days before the previously communicated deadline, for an update on the transition. On November 11, 2019, CenturyLink informed the AGO that the date for CenturyLink to exit the PS/ALI business is still being negotiated between CenturyLink and the UTC and the earliest they would be exiting the business is March 2020.
- 6 I, on behalf of the AGO, am actively negotiating with CenturyLink for a new contract under Department of Enterprise Services Master Contract #05116. CenturyLink has communicated that their intent would be to migrate off of the existing CenturyLink PS/ALI service and onto the new alternative PS/ALI service provider, as part of the larger managed service offering they have proposed to the AGO.

DATED this 15th day of November 2019, at OLYMPIA, Washington.



RICHARD GRIFFITH
Chief Information Officer