

**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. 33**

Request No: 33
Directed to: Public Counsel
Date Received: September 23, 2022
Date Produced: October 7, 2022
Prepared by: Brian Rosen
Witnesses: Brian Rosen

DATA REQUEST NO. 33.

At page 11 (lines 5-6) of his Cross-Answering Testimony, Mr. Rosen asserts that “CenturyLink does not appear to provide software diversity.”

- a. Does Mr. Rosen assume CenturyLink uses Infinera software on all of its 6 national transport networks?
- b. If your answer to subpart a. is no, if CenturyLink had transport network availability that did not utilize Infinera software or equipment on which it could have deployed Comtech’s SS7 links had Comtech asked, would Mr. Rosen’s testimony have changed in any way? If so, fully explain how.

RESPONSE:

- a. Mr. Rosen is not aware of how any CenturyLink networks available for this service are built and specifically whether they have common software, and so is unable to answer the first part of the question.
- b. The text referred to in Mr. Rosen’s testimony is explicitly discussing software diversity **within a network**, and CenturyLink does not appear to provide software diversity within a network. Thus, he does not think his testimony would change. While software diversity between networks is good, software diversity within the Green network would likely have prevented some or all of the failures observed by the State’s 9-1-1 system.