

**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. 39**

Request No: 39  
Directed to: Public Counsel  
Date Received: September 23, 2022  
Date Produced: October 7, 2022  
Prepared by: Brian Rosen  
Witnesses: Brian Rosen

**DATA REQUEST NO. 39.**

Does Mr. Rosen believe that, once the Phase 1 transition network was designed in early 2017, CenturyLink:

- a. had awareness or visibility into how Comtech would design, construct or maintain its SS7 links supporting the interconnection between ESInet1 and ESInet 2?
- b. had decision-making authority over how Comtech would design, construct or maintain its SS7 links supporting the interconnection between ESInet1 and ESInet 2?
- c. was actually involved in the decision about how Comtech would design, construct or maintain its SS7 links supporting the interconnection between ESInet1 and ESInet 2?

For each of subpart a-c that your answer is other than no, fully explain your response and produce all documents supporting your response.

**RESPONSE:**

- a. Mr. Rosen does not believe that CenturyLink had awareness or visibility into Comtech's design, construction or maintenance practice of the interconnect, but because it was, by contract, responsible for "network" and "transport", it should have been.
- b. Mr. Rosen does not believe CenturyLink had decision making authority over Comtech, but could have advised them, and could have made WMD aware of any issues.
- c. Mr. Rosen does not believe that CenturyLink was actually involved, but, as noted in the answer to subsection 'a' above, should have been.