

**BEFORE THE WASHINGTON  
UTILITIES & TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,

Complainant,

v.

CENTURYLINK COMMUNICATIONS, LLC,

Respondent.

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DOCKET UT-181051

**BRIAN ROSEN**

**ON BEHALF OF THE  
WASHINGTON STATE OFFICE OF THE ATTORNEY GENERAL  
PUBLIC COUNSEL UNIT**

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**Exhibit BR-6**

Comtech Response to Public Counsel Data Request No. 25

**December 15, 2021**

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

TeleCommunication System, Inc.'s Response to PC Data Request Nos. 24-29

October 18, 2021

**PC25. Does Comtech claim that the DS-3s referred to by Comtech did not fail?**

- a) **If they did fail, please confirm that two signaling links between TNS and Comtech were in those DS-3s.**

**RESPONSE:**

TSYS does not claim that the DS-3 failed, only the DS-1s failed.

- b) **Were there actually four signaling links between TNS and Comtech?**

**RESPONSE:**

Yes, there were four different DS-1 signaling links between TNS and Comtech. Please refer to the diagram TSYS provided as Exhibit A to TSYS Response to PC DRs 1-9 (REVISED), which shows these four distinct links (labeled Circuit A, Circuit B, Circuit C, and Circuit D). In this diagram, the locations on the left side of the page represent TSYS data centers and the locations on the right side of the page represent TNS data centers.

- c) **If there were four signaling links between TNS and Comtech, what circuits did the other two traverse? Were they affected by the outage?**

**RESPONSE:**

All four of TSYS's SS7 signaling links were affected by the outage. Two of the four SS7 signaling links between TNS and TSYS were DS-0s on DS-1s, for which CenturyLink was the underlying carrier.

- d) **If calls had reached the demarcation between CenturyLink and Comtech, could they have been processed and sent to the proper PSAP?**

**RESPONSE:**

Yes, based on TSYS's observations during the outage, TSYS believes that if 911 calls were delivered during the impairment periods, TSYS would have been able to process and send such calls to the proper PSAP.