

**BEFORE THE WASHINGTON
UTILITIES & TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,

Complainant,

v.

CENTURYLINK COMMUNICATIONS, LLC,

Respondent.

DOCKET UT-181051

BRIAN ROSEN

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

Exhibit BR-17

Comtech Response and Supplemental Response to Public
Counsel Data Request No. 26

December 15, 2021

PC26. Correspondence between CenturyLink, Comtech and Washington Military Department shows that active discussions were in progress to transfer calls between CenturyLink and Comtech with IP connections from the beginning of the project to transfer from CenturyLink to Comtech. The correspondence shows discussion of details of such an interface. Then suddenly, the interface was changed to a TDM (SS7) connection, apparently at the request of CenturyLink, in one meeting.

a) Please explain why that change was made?

RESPONSE:

TSYS requested IP connections to transfer calls from ESInet 1 to ESInet 2, however, CenturyLink insisted on using TDM connections. For example, in response to a TSYS asking CenturyLink to “[c]onfirm Comtech’s assumption we will use IP Circuits (SIP/RTP) for call routing and call transfer”, CenturyLink responded that “[c]alls originating from the West ESInet will be sent to Comtech on dedicated ISUP trunks. Transfer traffic sent from Comtec [sic] to the West ESInet will be on dedicated ISUP trunks...”¹

In meetings between TSYS, CenturyLink, and WMD that were held subsequent to the January 23, 2017 email, TSYS did attempt to persuade CenturyLink to connect to TSYS directly and via IP-based circuits instead of ISUP (TDM) circuits, however, CenturyLink held fast to its refusal to connect to TSYS *via* IP circuits or to connect directly. Unfortunately, TSYS was unable to locate written records of such discussions.

b) Please supply any correspondence not already provided that shows how that decision was changed from an IP connection to a TDM (SS7) connection.

RESPONSE:

As agreed, TSYS will provide the requested information, if any additional correspondence showing how the decision was changed from TSYS’s suggestion of IP connections to CenturyLink’s preferred TDM connections is found, in a supplemental filing.

¹ See TSYS Response to Public Counsel’s Data Requests 1-9 (Revised), Attachment B.1(b) at 3 (responses Comtech NG9-1-1 Questionnaire Questions A2.1 (Attachment B.1(b) was included as an attachment to the email included as Attachment B.1(a) to TSYS Response to Public Counsel’s Data Requests 1-9 (Revised) (Bruce King, Senior Government Account Manager, CenturyLink to Matt Hayes, TeleCommunication Systems, Inc., *Questionnaire* (sent Jan. 23, 2017))).

PC26. Correspondence between CenturyLink, Comtech and Washington Military Department shows that active discussions were in progress to transfer calls between CenturyLink and Comtech with IP connections from the beginning of the project to transfer from CenturyLink to Comtech. The correspondence shows discussion of details of such an interface. Then suddenly, the interface was changed to a TDM (SS7) connection, apparently at the request of CenturyLink, in one meeting.

- b) Please supply any correspondence not already provided that shows how that decision was changed from an IP connection to a TDM (SS7) connection.**

SUPPLEMENTAL RESPONSE:

TSYS conducted a good faith search of available records and was unable to locate additional relevant correspondence.