

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,

Complainant,

v.

CENTURYLINK COMMUNICATIONS, LLC,

Respondent.

DOCKET UT-181051

PETITION TO INTERVENE

1. Pursuant to WAC 480-07-355(1), TeleCommunication Systems, Inc. (“TSYS”) hereby petitions the Washington Utilities and Transportation Commission (“UTC” or “Commission”) for leave to intervene in the above-captioned docket as an intervener. TSYS requests intervention with full party status as set forth in WAC 480-07-340.

2. The business address for TSYS is:

TeleCommunication Systems, Inc.
2401 Elliott Avenue, STE 200
Seattle, Washington 98121

3. TSYS will be represented in this matter by Susan Ornstein. Ms. Ornstein is a full-time employee of TSYS. A separate notice of appearance will be filed with the Commission, as required by WAC 480-07-345(2).

4. TSYS requests service of all documents at the following address:

Susan C. Goldhar Ornstein
Senior Director, Legal & Regulatory Affairs
Safety & Security Division
Comtech Telecommunications Corp.
2401 Elliott Avenue, STE 200
Seattle, Washington 98121
susan.ornstein@comtechtel.com

5. TSYS was contracted by the Washington State Military Department, E911 Coordination Office (“SECO” or “MIL”) to provide the State of Washington’s Emergency Service IP network (“ESInet”) in 2016.

6. In 2017, TSYS and CenturyLink, SECO’s legacy ESInet provider, entered into a transition services agreement in order to transition the State of Washington’s current 9-1-1 network and ALI system from CenturyLink to TSYS.

7. On December 27, 2018, CenturyLink experienced a network outage event. At the time of this CenturyLink network outage, both CenturyLink and TSYS provided ESInet services to the State of Washington. CenturyLink’s network outage affected TSYS’s ability to process certain 911 calls from callers in the State of Washington due to impairments to circuits provided by CenturyLink.

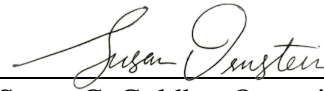
8. As an ESInet service provider to the State of Washington at the time of CenturyLink’s December 2018 network outage, TSYS has a significant interest in, and information relating to, the facts surrounding CenturyLink’s December 2018 network outage.

9. CenturyLink’s Motion for Third-Party Discovery filed on July 9, 2021, makes clear that TSYS’s participation as a party in this proceeding is appropriate.

10. WHEREFORE, for the foregoing reasons, TSYS respectfully petitions the Commission for leave to intervene in this proceeding.

Dated this 20th day of July 2020.

Respectfully submitted,

A handwritten signature in cursive script, reading "Susan C. Goldhar Ornstein".

Susan C. Goldhar Ornstein
Senior Director, Legal & Regulatory Affairs
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