

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION STAFF
RESPONSES TO DATA REQUESTS

DATE PREPARED: September 22, 2022

WITNESS: Commission Staff

DOCKET: UT-181051

RESPONDER: Commission Staff

REQUESTER: CenturyLink

CENTURYLINK DATA REQUEST NO. 37:

If the Commission Staff had initiated a complaint relating to the December 2018 outage against Comtech on the basis of its failure to obtain sufficient diversity for its SS7 links, would Mr. Webber support an argument by Comtech that is not legally responsible for failed 911 calls because its sole SS7 link vendor experienced an outage on its transport network? If your answer is other than no, fully explain your response.

RESPONSE:

Staff objects to this request as overbroad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence, and/or not proportionate to the needs of the case. Staff further objects to this request to the extent it requests more than is required by the Commission's rules and orders. Staff further objects to this data request to the extent that the information it seeks is protected by attorney client privilege and/or the work product doctrine. Staff further objects to the data request to the extent that the Company is asserting/assuming the existence of facts. Staff further objects to this request to the extent it seeks speculative and/or hypothetical information. Staff further objects to this request to the extent that it is beyond the scope of Witness Webber's testimonies.