

**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-8C

Comtech Confidential Supplemental Response to Public Counsel Data Request No. 30

December 15, 2021

**Shaded Information is Designated Confidential
per Protective Order in Docket UT-181051**

REDACTED VERSION

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

TeleCommunication System, Inc.'s Supplemental Response to

PC Data Request No. 30

November 19, 2021

PC30. In Comtech's response to Public Counsel Revised Data Request 2, subpart a, it stated that [REDACTED]

[REDACTED] However, the "Comtech Major Outage Report/Root Cause Analysis" indicates on page 5, paragraph 2.1.1 that there was [REDACTED]

[REDACTED] Explain with particularity why or why not.

RESPONSE:

CenturyLink's nationwide network outage was reported by the Federal Communications Commission ("FCC") to have lasted 37 hours.² As TSYS previously reported, however, TSYS saw evidence of impairments to CenturyLink's network from 03:40 ET on December 27 until 05:12 ET on December 29, 2018, a longer duration than determined by the FCC. The other impairments with CenturyLink's network may not have been directly related to the incident reported upon by the FCC. During the CenturyLink outage period, TSYS experienced intermittent loss of circuit redundancy, with at least one of such SS7 circuits down at most times. TSYS's NG9-1-1 service in Washington only experienced an "outage" (was unable to receive calls from ESInet 1) when all four links went down. TSYS used the term "majority" to mean over 50 percent of the total outage period (*i.e.*, as calculated by the FCC, over 18 hours and 30 minutes) in order to emphasize that the CenturyLink impairment duration did not match the impairment in the NG9-1-1 service in Washington. Since the total duration of TSYS's outages was [REDACTED] TSYS's network was operational – or not experiencing an outage – during the majority of the outage period.

**RESPONDENTS: Susan Ornstein, Senior Director, Legal & Regulatory Affairs
Todd Poremba, Vice President, Product Management**

¹ Comtech Final PCU Report at 5 (Comtech Root Cause Analysis CenturyLink Network Outage and Related E-911 Call Routing Impairment, MOR Due Date 01-11-2019, Unredacted Version).

² FCC, *December 27, 2018 CenturyLink Network Outage Report, A Report of the Public Safety and Homeland Security Bureau* at ¶ 1 (2019), <https://docs.fcc.gov/public/attachments/DOC-359134A1.pdf>