

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

Docket UT-181051

Washington Utilities & Transportation Commission v. CenturyLink Communications, LLC

**RESPONSE OF PUBLIC COUNSEL TO CENTURYLINK
DATA REQUEST NO. 13**

Request No: 13
Directed to: Public Counsel
Date Received: January 12, 2022
Date Produced: January 27, 2022
Prepared by: Brian Rosen
Witnesses: Brian Rosen

DATA REQUEST NO. 13.

On page 13 of his Direct Testimony, Mr. Rosen states that “generally advise[s] that supplier diversity be used to guard against the kind of failure that occurred here.” Provide all literature, standards, statutes, regulations or decisional law of which you are aware that make a similar suggestion.

RESPONSE:

Brian Rosen was careful to qualify his testimony with “generally advises” so as not to imply there were standards, regulations, or decisional law on the subject. In his professional opinion, carrier diversity is vital to avoid system failure when events like this one occur. Rosen is aware of several examples of failures like the one in question that have taken out an entire network for one carrier, and this is not the only event where all instances of a switch or other component failed due to configuration or software errors. As such, Rosen always strongly advises his clients to insist on carrier diversity in any 9-1-1 deployment.