

**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-15C

Comtech Confidential Response to Public Counsel Data Request No. 1,
with Confidential Attachment A (Revised September 16, 2021)

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

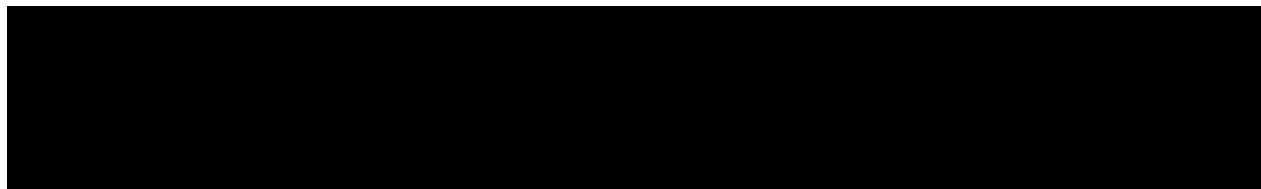
TeleCommunication System, Inc.'s Response to PC Data Request Nos. 1-9 (REVISED)

September 16, 2021

PC1. Please provide an annotated diagram of the entire SS7 network starting at the CenturyLink STP and continuing to the gateway that sends calls to the Comtech ESInet as it was during the incident. Please indicate where redundant elements provided reliable service and where physically they were located. For communications links, and particularly the SS7 signaling links, please indicate who actually provided the connection, and what form (DS-0, DS-1, DS-3, etc) it was ordered.

RESPONSE:

TeleCommunication Systems, Inc. ("TSYS") has no visibility into the CenturyLink STP and relied on TNS to deliver SS7 messages from CenturyLink's ESInet ("ESInet 1") to TSYS's ESInet ("ESInet 2"). Since the CenturyLink STPs were reportedly unaffected, TSYS speculates that CenturyLink's STPs used TDM end-to-end, not pseudowire at any point (unlike the SS7 connectivity that TSYS now suspects that CenturyLink chose for [REDACTED]).



A diagram showing TSYS's entire SS7 network is attached hereto as **Attachment A**.

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

