

UTC v. CenturyLink, Docket UT-181051
WMD Responses to CenturyLink Communications, LLC
Data Requests CTL-5–CTL-7
January 27, 2022
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WUTC DOCKET: 181051
EXHIBIT: BR-35X
ADMIT W/D REJECT

CTL-6 Please characterize and fully describe WMD’s role and involvement in the process and design decisions made among itself, CenturyLink, and Comtech throughout the transition from CenturyLink being the state’s 911 provider to Comtech being the state’s 911 provider.


RESPONSE:

WMD believes its role in design was minimal, beyond what was specified in the RFP. In fact, RFP-16-GS-NG911, in part, says, “. . . it is not the intent of this RFP to provide implementation details that would limit the BIDDER’s solution to one particular technology.” Comtech continually presented WMD with its design and implementation plans to gain WMD’s concurrence. This was anticipated and appreciated throughout the project. When Comtech and CenturyLink could not reach an agreement on how to interconnect the two networks, WMD attempted to facilitate and mediate the interconnection design discussions, but WMD relied upon these two contractors to meet the terms of their separate agreements with WMD. Upon agreement by all parties to meet in person and work together to arrive at a solution mutually agreeable, WMD, to include the technical staff of the State 911 Coordination Office, were present to continue facilitating the discussion. The Telecommunications Engineer in the State 911 Coordination Office mediated the telecommunications engineers to arrive at a mutually agreeable solution. Over the course of several months, Comtech, CenturyLink, and CenturyLink’s subcontractor Intrado, worked together to further develop and refine the interconnection solution, which culminated in a formal presentation by all parties to WMD. At the conclusion of the presentation, WMD accepted the solution for

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implementation. The level of collaboration described above, continued for the most part, throughout the transition.

Date Prepared: 1/24/2022
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Purpose: The purpose of this document is to provide a list of questions/topics Comtech Telecommunications (Comtech) would like to discuss with Century Link and West, on behalf of the state of Washington, in order to facilitate the inter-connection, integration and inter-operability testing between Century Link's and/or West's NG911 Service Platform (ESInet1) to Comtech's NG911 Service Platform (ESInet2). The end result we want to achieve is joint agreement on communication and plans to transition the WA PSAPs and Carriers off ESInet1 and the West ALI Database, and onto ESInet2 and Comtech ALI database.

Comtech wants to understand certain aspects of West's in-bound and/or out-bound signaling for call origination and call transfer (ESInet to ESInet Inter-connection). Additionally, Comtech wants to discuss utilizing ALI to ALI Query during the transition of the WA PSAPs to ESInet2, as well as the PSAP and Carrier cuts. Finally, we want to discuss the ALI Data Transition requirements.

The areas of discussion:

1. Project Transition Planning
 - a. Initial Discussions
 - b. Communication Plan
 - c. Review of documentation and call and/or data flows
 - d. IOT Scheduling (ESInet to ESInet and ALI to ALI query)
 - e. PSAP Transition/Cuts to ESInet2
 - f. Carrier Transition/Cuts to ESInet2
2. ESInet to ESInet (Selective Router Inter-Connection and IOT)
 - a. ESInet1 and ESInet2 - ICD Review & Agreement
 - b. Inter-connection, Transport/Facilities
 - c. Inter-Operability Testing (IOT)
3. Transport (Inter-connection and circuits)
4. ALI to ALI Query Connection
 - a. NENA 04-001 ALI to ALI query Discussion and Agreement
 - b. Inter-connection, Transport/Facilities
 - c. IOT
 - d. Data Transition
5. PSAP Cuts to ESInet2
6. Carrier Cuts to ESInet2

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A1 - Transition Planning (Stage 1 through Stage 3)

Comtech business point of contact: Danny McGinnis

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Our project manager (PM) contact: Rebecca Yeatman

206.792.2211, Rebecca.yeatman@comtechtel.com


Comtech's PM will be CenturyLink/West's main point of contact for the transition work. It is expected that ESInet2 and ESInet1's Technical Transport and Telecom teams will need to communicate directly as needed to facilitate the integration and testing of the necessary trunks and circuits for inter-connection. Once we work through the outline discussion items, the Comtech PM will facilitate other meetings as needed, as well as action items on the Comtech side. She will work with her counterparts on the West/CenturyLink side as needed.

#	Question
A1.1	Communication Plan <ul style="list-style-type: none"> • Exchange Contact Information: <ul style="list-style-type: none"> ○ project management ○ technical transport testing ○ technical telecom switch testing • Set up weekly meeting timeslot
A1.2	Target date ICD reviewed and agreed on (inter-connection)
A1.3	Target trunk/circuit testing complete (integration)
A1.4	Target date IOT testing: Call Routing - test plan review, start and then complete (integration)
A1.5	Target date IOT testing: ALI to ALI Query - test plan review, start and then complete (integration)
A1.6	Target date for ESInet to ESInet Production Go Live
A1.7	Target date for ALI to ALI Query Production Go Live
A1.8	PSAP Cut Plan
A1.9	Carrier Cut Plan

A2 - Transport (Inter-Connection and Circuits) (Stage 1-3)

Comtech has interconnected to CenturyLink and West on other 911 projects, including NG911. We expect to follow standard operating procedures to manage Transport and Telecom interconnection.

#	Question
A2.1	Confirm Comtech's assumption we will use IP Circuits (SIP/RTP) for call routing and call transfer.

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	<p>10/26/16 West confirmed that they have a lab.</p>
<p>A2.2</p>	<p>Can Comtech use the same IP Circuits for Call Origination, Call Transfers and ALI Queries? If no, see A2.4, additional transport/facility questions for ALI Query circuits. 10/26/16 – West confirmed that separate circuits must be used for calls and ALI</p>
<p>A2.3</p>	<p>A2.3.1 Discuss circuit bandwidth required to handle Carrier’s Call Origination and Call Transfers for duration of Carrier Transition and ALI queries if using same circuits for all 3. A2.3.2 How many concurrent calls (peak during busy hours)? Include ALI Query volumes, utilizing peak calls)? A2.3.3 If we agree to utilize same circuits for data, do we want to partition circuits (QOS) for the 2 types of traffic (voice versus data)? A2.3.4 Discuss originating trunk group (OTG) conveyance in INVITE message from Century Link/West to Comtech’s NG911 Service Platform.</p>
<p>A2.4</p>	<p>A2.4.1 Given we are not cutting carriers in Stage 1 (Stage 1 = PSAP onboarding to ESInet2), does West require separate circuits for Call Origination and Call Transfers to the Comtech ESInet? And separate circuits for transfers from the Comtech ESInet to the West IPSR? A2.4.2 Comtech assumes West/CenturyLink have diverse and redundant POIs: <ul style="list-style-type: none"> ○ <u>What are the designated destination POIs on West side?</u> <ul style="list-style-type: none"> ▪ 10/26/16 West has two Core Production sites: Englewood, CO and Miami, FL: ○ Will need to exchange other data: <ul style="list-style-type: none"> ▪ Origination IP Address (Comtech’s) plus CLLI codes for both CLCs ▪ Destination IP Address (West’s and/or CenturyLink’s) ▪ CLLI codes for all CenturyLink/West POIs </p>
<p>A2.5</p>	<p>If <u>separate circuits</u> required for ALI to ALI Query: <ul style="list-style-type: none"> • Assumes West/CenturyLink diverse and redundant POIs: <ul style="list-style-type: none"> ○ <u>What is the designated destination POIs on West side?</u> <ul style="list-style-type: none"> ▪ West confirmed 2 POIs for ALI are in Longmont, CO and Seattle, WA. Appeared to confirm we can't use our existing circuits for ALI Link to Longmont, CO. ○ Comtech assumes queries to be over MPLS circuits ○ Number of circuits ○ Will need to exchange other data: <ul style="list-style-type: none"> ▪ Origination IP Address (Comtech’s) plus CLLI codes for both CLCs ▪ CLLI codes for all CenturyLink/West POI Switches that Comtech will need to order circuits to ▪ Destination IP Address (West’s and/or Century Link’s) </p>

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A3 - ICD Review Call Origination and Call Transfer (Call Flows) (Stage 1-3)

#	Questions/Issues
<p>A3.1</p>	<p>Review West’s ICD –IP Network-to-Network Interface Spec, For VoIP Interconnection to the ESInet, Version 1.3.</p>

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A3.2	Are there any updates to the sample Call Origination INVITE messages in the West ICD, referenced in A3.1? <ul style="list-style-type: none"> • Can West ESInet assign a Routing Destination Number (RDN) per PSAP for call origination during the transition? • If yes, Comtech will provide RDNs for each PSAP
A3.3	Need to determine means to handle call transfer (both ways) <ul style="list-style-type: none"> • What would SIP message call flow look like for Call Transfers? • What data is required in SIP messaging for Call Transfer? • Can West ESInet assign a Routing Destination Number (RDN) per PSAP for handling call transfers during the transition? • If yes, Comtech will provide an additional transfer RDN for each PSAP. • If no, what other means can we utilize to handle call transfers?
A.3.4	Agree to share a sample Call Transfer SIP message, once we've established how to handle call transfers. Plus add to ICD.
A.3.5	What error scenarios should we consider? e.g. Conditional PSAP Routing (conditions 1, 2 and 3)
A.3.6	Call Routing - IOT Test Plan – Comtech to create, West/CTL and State will review


A4 - ALI to ALI Query and ALI Transition (Stage 1-2)

Plan is to cut PSAPs onto the Comtech ESInet in Stage 1 of the transition. PSAP query and ALI data spill processes will be managed by Comtech's ESInet2 upon the PSAP cut.

#	Questions/Issues
A4.1	Confirm will utilize 04-001 ALI to ALI query
A4.2	Can Comtech get a sample of the formatted ALI response data from West?
A4.3	Can we get a sample of what field data is returned on a NRF?
A4.4	ALI IOT Test Plan – Comtech to create, West and State will review
A4.5	Can Comtech get a list of the carriers and the corresponding Company IDs who are loading data into the West ALI for state of WA? If you also have main contact information for carriers, it would be helpful if we received that as well.
A4.6	A4.6.1 Can Comtech get a sample of the format, including actual telephone number record data, that West will be providing the state, specific to the ALI Telephone Number Data? A4.6.2 Can Comtech get a sample of the format, including actual MSAG range record data, that West will be providing the state, specific to the MSAG Range Data?

A.5 - PSAP Cut (Stage 1)

#	Questions/Issues
A5.1	Add discussion items once we solidify A2, A3 and A4

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A.6 - Carrier Cut (Stage 3)

#	Questions/Issues
A6.1	Add discussion items once we solidify A2, A3 and A4.