EXH. MDV-2R Docket UT-181051 Witness: Martin D. Valence

WUTC DOCKET: 181051 EXHIBIT: MDV-2C (R) ADMIT ☑ W/D ☐ REJECT ☐

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,

DOCKET UT- 181051

Complainant,

v.

CENTURYLINK COMMUNICATIONS, LLC,

Respondent.

EXHIBIT TO TESTIMONY OF

MARTIN D. VALENCE

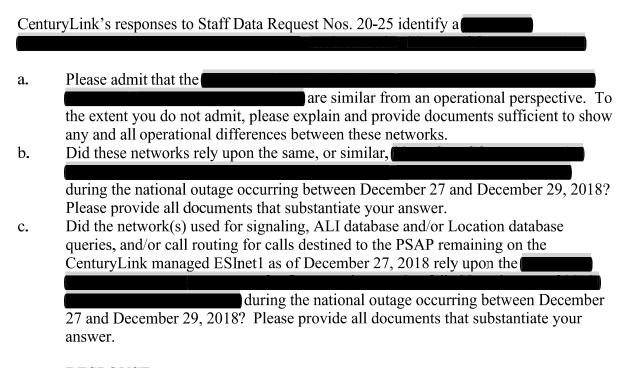
ON BEHALF OF CENTURYLINK COMMUNICATIONS, LLC

CLC RESPONSE TO STAFF DATA REQUEST 27(C)

March 31, 2022

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UTC STAFF DATA REQUEST NO. 27:



RESPONSE:

CLC objects to this data request on the grounds that it is overly broad and unduly burdensome. CLC further objects to this data request on the grounds that it is not reasonably calculated to lead to the discovery of admissible evidence. This data request seeks to investigate an outage on CLC's national transport network. The outage did not directly affect CLC's or its affiliates' remaining 911 network in Washington. Instead, it affected CLC's national transport network. More specifically, the outage affected *interstate DS-3 circuits* purchased by a vendor of Comtech on behalf of Comtech (for the provision of SS7 functionality), the responsible Washington 911 provider for the PSAPs that experienced a 911 outage. The interstate and non-regulated services provided on CLC's national transport network, and the facilities utilized to provide such services, are not regulated by the Commission, and the Commission lacks jurisdiction over them. In Re AT&T Commc'ns of the Pac. Nw., No. 04, 2003 WL 23341214 (Wash. U.T.C. Dec. 1, 2003) ("AT&T's proposed language would encompass facilities-access purchased out of federal tariffs over which the Commission lacks jurisdiction.") (citing 34th Supplemental Order; Order Regarding Owest's Demonstration of Compliance with Commission Orders, Investigation Into US WEST Communications, Inc.'s Compliance With Section 271 of the Telecommunications Act of 1996; US WEST Communications, Inc.'s Statement of Generally Available Terms Pursuant to Section 252(f) of the Telecommunications Act of 1996, Dkt. Nos. UT-003022, UT-003040, ¶ 22 (May 2002)); MilleniaNet Corp. v. Pennsylvania Pub. Util. Comm'n, No. 990 C.D. 2008, 2009 WL 9104922 (Pa. Commw. Ct. Apr. 30, 2009) (complaint

CONFIDENTIAL PER PROTECTIVE ORDER

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dismissed because the "the PUC does not have jurisdiction over interstate telecommunications services."). Without waiving its objections, CLC responds as follows.

Subject to its object	tions above CLC	denies that the "		
Subject to its object	tions above, CEC	demes that the		
similar from an ope by "similar from an December 27, 2018	operational pers	pective," the two	networks were (as	
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Subject to its	objections above, CLC responds that in December 2018 the
	See CLC's response to Staff DR 27a.
queries, and/	ork(s) used for signaling, ALI database and/or Location da or call routing for calls destined to the PSAP remaining on managed ESInet1 as of December 27, 2018 rely upon the
	during the national outage
_	tween December 27 and December 29, 2018? Please providuat substantiate your answer.
unable to iden Location data	atify all equipment utilized for "signaling, ALI database and/or base queries, and/or call routing for calls destined to the PSAP
unable to iden Location data remaining on	objections above, because ESInet1 is no longer in service, CLC atify all equipment utilized for "signaling, ALI database and/or base queries, and/or call routing for calls destined to the PSAP the CenturyLink managed ESInet1 as of December 27, 2018." a CLC's understanding that

Drew Groff, Director NOC Compliance Carl Klein, Manager Public Safety Services