

**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. 20**

Request No: 20
Directed to: Public Counsel
Date Received: September 23, 2022
Date Produced: October 7, 2022
Prepared by: Brian Rosen
Witnesses: Brian Rosen

DATA REQUEST NO. 20.

At page 2 (line 15) through page 3 (line 1), Mr. Rosen points to language in the 2009 contract between CenturyLink's predecessor and the Washington Military Department ("WMD") requesting a switch to IP technology.

- a. Admit that CenturyLink's contract with WMD, as modified by Amendment M, does not require ESInet1 and ESInet2 to be interconnected via SIP rather than via SS7/TDM. If Public Counsel does not admit, fully explain your response.
- b. Admit that WMD acknowledged and did not object to Comtech, Intrado and CenturyLink's decision to utilize SS7/TDM interconnection. See, e.g., Exhibit SH-5C (pages 3-5). If Public Counsel does not admit, fully explain your response.

RESPONSE:

- a. Admit. The contract speaks for itself.
- b. Deny. Public Counsel does not have a written record stating that WMD objected to the SS7 interconnect.