

**BEFORE THE WASHINGTON  
UTILITIES AND TRANSPORTATION COMMISSION**

*Washington Utilities and Transportation Commission v. CenturyLink  
Communications, LLC*  
**DOCKET UT-181051**

CenturyLink Communications, LLC (CLT) Data Requests CTL-8–CTL-10 to  
Washington Military Department, State E911 Coordinator’s Office (SECO)

**GENERAL OBJECTIONS**

SECO incorporates the following general objections into each individual data request response below:

1. SECO objects to each data request to the extent that it seeks or purports to seek information protected by any applicable privilege or immunity, including the Attorney-Client Privilege and Work-Product Doctrine. Any inadvertent production of privileged or work-product protected material is not a waiver of the status of such work product, nor is any response herein to be deemed a waiver of any privilege, doctrine, or immunity.
2. SECO objects to any data request or instruction that purports to require more than is required by the applicable rules of the Commission, including the creation of records that are not currently in existence.
3. SECO objects generally to each data request to the extent (i) that the information requested is known to CenturyLink or its counsel; (ii) the request requires disclosure of information, documents, writings, records, or publications in the public domain; or (iii) the information requested is equally available to CenturyLink or its counsel from sources other than SECO.
4. SECO objects to each data request to the extent that it is overly broad, vague and ambiguous, unduly burdensome, and calling for information that is irrelevant or not proportional to the needs of the case.
5. These responses are provided on the basis of the best information currently available to SECO after diligent effort to gather such information within its possession, custody or control. SECO reserves the right to amend these responses as new information is gathered.

**RESPONSES TO CENTURYLINK COMMUNICATIONS, LLC DATA REQUEST**

**CTL-8** Your response to CTL-7 provides assumptions about the demarcation point. It is universally recognized that SS7 utilizes a signaling network that is separate from the voice network that it supports and interacts with. Your response to CTL-7 does not describe whether your assumed demarcation point on the Phase I network is on the voice network, the signaling network or both.

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- (a) Please identify the location of the demarcation point on the Phase 1 signaling network;
- (b) Please identify the location of the demarcation point on the Phase 1 voice network; and
- (c) Fully describe your views on why the Phase 1 signaling network and the voice network demarcation points are in the same or different locations.
- (d) Identify and produce all documentary materials that support your responses to subparts (a)-(c).

**RESPONSE:**

In the response to CTL-7, SECO did not identify any other demarcation points with regards to interconnecting the two ESInets because SECO understood that the purpose of interconnecting the two ESInets was for CenturyLink to pass original 911 calls to the Comtech/TSYS ESInet. To SECO, this meant that a distinction between SS7 and voice at the demarcation point was unnecessary.

- (a) SECO understood that both the voice and SS7 demarcation points were located together at the point identified in its response to CTL-7.
- (b) SECO understood that both the voice and SS7 demarcation points were located together at the point identified in its response to CTL-7.
- (c) As stated in the response to CTL-7, CenturyLink identified the demarcation points for the OSP customer's 911 calls as the legacy network gateways (LNGs) provided by Intrado and every OSP was required to connect to those, and did not identify a voice or SS7 demarcation point. Therefore, SECO's understanding was based on the example provided by CenturyLink.

In addition, it is commonly understood that the LNG's constitute what is known as a Signalling Point (SP) in the SS7 networks. Signaling Points are nodes that originate SS7 messages using either the ISDN-User Part (ISUP) and/or Transaction Capabilities Application Part (TCAP) Protocols, with the ISUP being used to set-up, maintain and disconnect voice calls to/from the Public Switched Telephone Network (PSTN). Therefore, SECO believes that CenturyLink's STP was the demarcation point for the SS7 messages, although STPs do not originate or terminate SS7 messages, other than maintenance messages (e.g., OAMP), all messages received by an STP are sent to the Destination Point Code (DPC) contained in the IAM and the IAM also contains the voice trunk (CIC) that will be used for the call. Accordingly, the LNGs served as the demarcation point for both the SS7 network and the PSTN.

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- (d) In response to CTL-7, SECO submitted the Qwest Network Disclosure Announcement, No. 757, issue 3, regarding NG9-1-1 for the State of Washington, to be implemented October 1, 2012. This was the only document which supports SECO's understanding of the demarcation point. While this document does not directly relate to the question about the demarcation point of the interconnecting trunks, the document does illustrate how CenturyLink, Qwest at the time it was published, identified the demarcation point for the OSPs. Also, SECO is unaware of CenturyLink documenting separate demarcation points for SS7 and voice to SECO or the OSPs.

In responding to CTL-8(c), SECO relied upon the International Telecommunications Union (ITU) Q-series recommendations for Signalling System 7 (found here: <https://www.itu.int/itu-t/recommendations/index.aspx?ser=Q>) to assist in describing SECO's views.

Date Prepared: 3/3/2022  
Prepared by: AAG Dawn Cortez and William Andrew Leneweaver  
Witness: William Andrew Leneweaver  
Phone No: 360.586.6470