

**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. 36**

Request No: 36  
Directed to: Public Counsel  
Date Received: September 23, 2022  
Date Produced: October 7, 2022  
Prepared by: Brian Rosen  
Witnesses: Brian Rosen

**DATA REQUEST NO. 36.**

At page 15 (lines 10-15) of his Cross-Answering Testimony, Mr. Rosen asserts that “CenturyLink could not have provided Comtech supplier diversity for its SS7 links prior to the December 2018 outage.

- a. Admit that CenturyLink could have provided Comtech network diversity for its SS7 links prior to the December 2018 outage. If your response is other than admit, fully explain your response and produce all documents supporting your response.
- b. Assuming for purposes of this data request that each of Lumen’s 6 national transport networks was operated and maintained by distinct Lumen subsidiaries, admit that in that scenario that Lumen would have been able to offer supplier diversity to Comtech for its SS7 links prior to the December 2018 outage. If your response is other than admit, fully explain your response and produce all documents supporting your response.

**RESPONSE:**

- a. Mr. Rosen explicitly states that in his professional opinion, network diversity is not the same as supplier diversity. Mr. Rosen admits that CenturyLink/Lumen could have provided network diversity, but he would not consider that to be supplier diversity and would advise his clients to obtain supplier diversity.
- b. See answer to subpart ‘a’.