

**BEFORE THE WASHINGTON
UTILITIES & TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,

Complainant,

v.

CENTURYLINK COMMUNICATIONS, LLC,

Respondent.

DOCKET UT-181051

BRIAN ROSEN

**ON BEHALF OF THE
WASHINGTON STATE OFFICE OF THE ATTORNEY GENERAL
PUBLIC COUNSEL UNIT**

Exhibit BR-7C

Comtech Confidential Response to Staff Data Request No. 2
(Revised September 16, 2021)

December 15, 2021

**Shaded Information is Designated Confidential
per Protective Order in Docket UT-181051**

REDACTED VERSION

CONFIDENTIAL PER PROTECTIVE ORDER IN DOCKET NO. UT-181051

UTC v. CenturyLink, Docket UT-181051

TeleCommunication System, Inc.'s Response to PC Data Request Nos. 1-9 (REVISED)

September 16, 2021

PC2. The system appears to have failed completely when two DS-3s failed. Normally, at least four signaling links are provisioned over geospatially diverse services.

RESPONSE:

TSYS's DS-3s did not fail during the CenturyLink outage.

a. Please explain what the intended redundancy was.

RESPONSE:

The intended redundancy was to have [REDACTED] which is most certain using a single vendor since different vendors will not share information with one another about the physical paths they use.

At the onset of the outage, [REDACTED]

[REDACTED]

b. Please explain how the failure of two links caused all calls to fail.

RESPONSE:

[REDACTED]

**Respondents for PC2: Susan Ornstein, Senior Director, Legal & Regulatory Affairs
Todd Poremba, Vice President, Product Management**