

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION STAFF
RESPONSES TO DATA REQUESTS

DATE PREPARED: September 22, 2022

WITNESS: Commission Staff

DOCKET: UT-181051

RESPONDER: Commission Staff

REQUESTER: CenturyLink

CENTURYLINK DATA REQUEST NO. 38:

Does Mr. Webber agree that network diversity for SS7 links, in addition to geographic diversity, is likely to provide greater assurance that an outage will not impair the delivery of 911 calls? If your answer is other than yes, fully explain your response.

RESPONSE:

Staff objects to this request as overbroad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence, and/or not proportionate to the needs of the case. Staff further objects to this request to the extent it requests more than is required by the Staff further objects to this data request to the extent that the information it seeks is protected by attorney client privilege and/or the work product doctrine. Staff further objects to this request to the extent it seeks speculative and/or hypothetical information. Staff further objects to this request to the extent that it is beyond the scope of Witness Webber's testimonies.

Without waving the above objections, Staff responds as follows:

Witness Webber Webber's findings and opinions on the diversity of TSYS' SS7 links are provided in his testimonies. *See* Witness Webber's December 15, 2021 prefiled Direct Testimony (Webber, Exh. JDW-1CT at 38:1 - 43:27) and August 31, 2022 Cross-Answering Testimony (Webber, Exh. JDW-33CT at 5:20 - 15:10).