

**BEFORE THE WASHINGTON  
UTILITIES & TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,

Complainant,

v.

CENTURYLINK COMMUNICATIONS, LLC,

Respondent.

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DOCKET UT-181051

**BRIAN ROSEN**

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

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**Exhibit BR-12C**

Comtech Confidential Response to Public Counsel Data Request No. 18

**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. 10-23

October 6, 2021

**PC18. Supply a timeline of the progression of understanding the incident from your point of view went. In this timeline, please note:**

**a) When did you first receive notice that there were issues?**

**RESPONSE:**

TSYS learned that there were issues [REDACTED] when TSYS received the first Border Gateway Protocol (“BGP”)<sup>2</sup> alerts [REDACTED]

[REDACTED]

On [REDACTED]  
[REDACTED]

**b) What steps did you take?**

**RESPONSE:**

TSYS’s NOC called in its top engineers and started an internal troubleshooting bridge at [REDACTED] [REDACTED] TSYS’s engineers immediately started investigating the problems reported by PSAPs.

**c) When was CenturyLink made aware of the problems?**

**RESPONSE:**

TSYS cannot be certain as to when CenturyLink first became aware of the problems, but TSYS first reached CenturyLink’s NOC to notify CenturyLink of the issue and attempt to open a trouble ticket [REDACTED] [REDACTED] as an example of the problem.

**d) What steps did they take to determine what failed?**

**RESPONSE:**

TSYS cannot speculate as to CenturyLink’s actions.

**e) When was it clear that no calls were getting to your system?**

**RESPONSE:**

It became clear to TSYS that no calls were being delivered from ESInet 1 on [REDACTED] [REDACTED] when TSYS received the first telephone call from a PSAP regarding the CenturyLink outage

*[Remainder of page intentionally left blank]*

<sup>2</sup> A BGP makes routing decisions based on paths, network policies or rule sets configured by a network administrator.

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**f) When was it clear that the problem was in the SS7 network?**

**RESPONSE:**

At [REDACTED] TSYS realized that the problem of 911 calls not coming through was due to an issue with the SS7 network.

**g) When was it clear the problem was past the CenturyLink demarc?**

Once TSYS realized that the problem of 911 calls not coming through in Washington was due to the SS7 network (with CenturyLink circuits), which was at [REDACTED] TSYS realized the problem was not due to CenturyLink ESInet I being down.

**h) When was TNS made aware of the problems?**

TSYS is not comfortable speculating as to when TNS was aware of the problem. The TSYS NOC, however, [REDACTED] TNS was already aware of the nationwide CenturyLink outage when TSYS first spoke with TNS.

**i) What steps did they take to determine what failed?**

TSYS cannot speculate as to the actions of another company.

**j) When was it clear the problem was failures in the two DS-3s?**

The DS-3s did not fail during the outage.

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