

**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. 43**

Request No: 43
Directed to: Public Counsel
Date Received: September 23, 2022
Date Produced: October 7, 2022
Prepared by: Brian Rosen
Witnesses: Brian Rosen

DATA REQUEST NO. 43.

At pages 21-22 of his Cross-Answering Testimony, Mr. Rosen relies without qualification on the network diagram prepared by Comtech (see Exhibit BR-32C). Mr. Rosen attended the deposition of CLC witness Carl Klein, during which Mr. Klein specifically identified errors in Comtech's diagram (including, e.g., that Comtech shows CenturyLink and Comtech STPs that did not exist in the Phase 1 network) (see Klein depo at pages 78:12-83:14). Explain why Mr. Rosen ignores these errors in his Cross-Answering Testimony. Fully explain and support in what ways, if any, Mr. Rosen disagrees with Mr. Klein's critique of Comtech's network diagram.

RESPONSE:

Mr. Rosen believes that the reference to this request is Exhibit BR-30C and not Exhibit BR-32C. Mr. Rosen does not believe his testimony changes as a result of any errors pointed out by Mr. Klein. The testimony refers to the handoff between TNS and Comtech and is not dependent on what equipment was on the Comtech side of that handoff. Mr. Rosen does not know if Mr. Klein is correct with respect to what equipment was on the Comtech side of the interconnect between TNS and Comtech, but it does not matter.