

REDACTED

UTC v. CenturyLink, Docket UT-181051  
SECO Responses to CenturyLink Communications, LLC  
Data Requests CTL-8–CTL-10  
March 7, 2022  
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WUTC DOCKET: 181051  
EXHIBIT: JDW-45CX (R)  
ADMIT  W/D  REJECT

- CTL-10** In its response to data requests in this case, most recently in response to CTL-1, Comtech [REDACTED]. In response to CTL-14, Public Counsel asserts that Comtech erred “by not creating a signaling network to support its 911 network using supplier diversity.”
- (a) Was WMD aware, prior to the December 2018 network outage, that Comtech lacked supplier diversity in the signaling network it designed and constructed to support Phase 1 ESInet to ESInet interconnection? If your answer is yes, please fully describe WMD’s awareness and produce all documents regarding WMD’s awareness and any discussions with Comtech regarding the need to ensure supplier diversity.
  - (b) Did Comtech err by not creating a signaling network to support its 911 network using supplier diversity? If your answer is other than yes, please fully describe the basis for your answer.

**RESPONSE: OBJECTION** - The request seeks information that calls for a legal conclusion, is irrelevant to the proceeding, and not reasonably calculated to lead to the discovery of admissible evidence. Without waiving this objection or any of SECO’s other objections, SECO provides the following response.

- (a) SECO did not specify supplier diversity in the signalling network supporting the ESInet-to-ESInet interconnection. Because of this, SECO was not monitoring supplier diversity in the signaling network it designed and constructed to support Phase 1 ESInet to ESInet interconnection.
- (b) Because SECO did not specify supplier diversity in the signaling network supporting the ESInet-to-ESInet interconnection, SECO does not believe Comtech/TSYS erred by not creating a signalling network supporting the ESInet-to-ESInet interconnection.

In all other aspects of its 911 network supporting Washington State, Comtech/TSYS has provided a fully redundant ESInet with geo-diverse connections from the originating network ingress demarcation points to the PSAP egress demarcation points and between all network nodes/data centers, in many cases utilizing multiple suppliers to ensure geo-diversity and complete redundancy.

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