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UT-140597 RESPONSES TO UTC DATA REQUESTS 70-80 September 12, 2014

77. Please provide the communication processes and procedures used by the CenturyLink Minneapolis, MN Service Operations Center (SOC) to support the WA 911 system.

[Note - we are reading this as Network Operations Center, or NOC, not SOC]

CenturyLink Response:

When a service affecting event is detected, the CenturyLink 911 Repair Center will:

(1) Attempt to contact the PSAP(s) in the affected area(s):

(a) Call the Contact listed in the PSAP Profile; this information is updated as needed via the Account Team.

(b) Call the administrative lines for the PSAP as annotated in PSAP Profile notes.

(c) Call the routing telephone number for the 911 trunks for the PSAP as annotated in PSAP Profile notes.

(d) Call the backup PSAP as annotated in the Condition 3 section or the Make Busy Key section of the PSAP Profile notes.

(e) If all of the above fail, contact the PSAP closest to the impacted PSAP and see if they have any type of communication with the PSAP that is impacted. This could include by radio communications, cell phone, or by teletype.

(2) Notify the 911 Service Manager for the area that is impacted. The Service Manager assists with customer communication as needed, and serves as the point of escalation if the customer experiences trouble reaching the 911 Repair Center.

(3) Provide notification to the 911 Duty Supervisor and 911 Duty Tech Support.

(4) If the incident isolates 911 and requires media notification, the 911 Repair Center works with the Network Event Management Center (NEMC) and specific Market Development Manager (MDM) to issue appropriate emergency instructions to the public via media outlets.

a. Please provide the escalation process used by the CenturyLink SOC (Minneapolis, MN) during the April 9th or 10th, 2014 Washington State 911 outage.

CenturyLink Response:

CenturyLink followed the process outlined above, as applicable, for this specific outage. Per the information provided in response to Staff Data Request 3 (a summary of the calls between the PSAPs, CenturyLink, Intrado, the state 911 offices, etc), CenturyLink began contacting the PSAPs as it learned of the outage. However, because the service affecting event was not on CenturyLink's network, CenturyLink did not have immediate visibility to the outage or the reasons for the outage. In many cases the PSAPs were already aware that calls were not going through and they were contacting CenturyLink.

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Supplemental Response to UTC Data Request 77 October 9, 2014

Supplemental Response

Please provide a narrative discussion of how communications among CenturyLink, Intrado, and the PSAPs have changed or improved since the April outage.

a. Describe what occurred during the outage in terms of communications.

Response: As noted in the previous response to the data request, the CenturyLink 911 Repair Center takes certain actions when a service affecting event is detected. In the case of the April 2014 outage, the service affecting event was outside of CenturyLink's network and CenturyLink therefore did not detect the event immediately. CenturyLink learned of the 911 outage when PSAPs began contacting the 911 Repair Center with out of service complaints.

At approximately 12:40 AM PDT on April 10 Kathy Miller received a call from a PSAP indicating there was a service-affecting event. CenturyLink's 911 Repair Center received a call from a PSAP indicating trouble with 911 calls at approximately 1:01 AM. CenturyLink notified Intrado of trouble at 12:58 AM. As detailed in Response to RS-3, attachment 3.2, calls were made between the PSAPs, CenturyLink and Intrado and between CenturyLink and the State 911 coordinator's office continuously during the outage. During the outage, CenturyLink established a conference bridge for internal communications, and the PSAPs established a bridge for updates and information. Kathy Miller, the WA 911 Service Manager, participated on both bridges sharing updates.

CenturyLink is aware that some PSAP callers to the 911 Repair Center experienced long hold times – this was due to the extremely high volume of calls coming in to the Center. In addition, some PSAPs attempted to failover their calls to 10-digit numbers that had not previously been provided to CenturyLink – due to security concerns, this is not permitted.

Attachment 3.4 to data request RS-4 provides information regarding additional phone calls and e-mails between CenturyLink, Intrado, and the PSAPs during the outage, and Confidential Attachments 3.8 and 3.9 show notes related to calls. Confidential Attachment 3.10 also provides information about communications between CenturyLink, Intrado, and the PSAPs during this time. UT-140597 Supplemental Response to UTC Data Request 77 October 9, 2014

b. Describe any revisions, changes, or improvements to the communication process.

Response: CenturyLink and Intrado are working on an Interface Agreement (IFA) to further improve the communications between the teams, and though it has not been finalized the teams are socializing the new procedures. A copy will be provided when it is final. The IFA will reflect the collaborative efforts of the companies' respective NOCs over the past several months to greatly improve the Operational partnership and Service Delivery to our Public Safety customers.

CenturyLink & Intrado are also working to reduce reroute delay through proactive efforts to obtain alternate route options (e.g. admin line, back-up PSAP) that can be preconfigured, and also procedural enhancements to enable faster implementation of manually built real-time reroutes as necessary.

In addition, the following actions have been taken by CenturyLink to improve our communication procedures:

- Revised the procedures used by the Service Management team to ensure they immediately contact the 911 Center Duty Manager should they have difficulty reaching the center.
- Conducted refresher training with the 911 Center technicians on the Duty Manager and Service Management paging procedures to alert them of all customer service impacting issues.
- Implemented a biweekly "Executive Briefing for Service Operations" in which the respective Operations team leaders have developed a focused "Get Well Plan" identifying & tracking through resolution the key operational issues and gaps.
- The CenturyLink has undertaken an initiative to obtain/update contact email addresses for all of our PSAPs, and will be implementing electronic notification procedures to supplement the current voice call procedures in the near future.