

**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-3C**

Washington Military Department Response to Public Counsel Data Request No. 2,  
Confidential Attachment 2, Transition Plan Presentation

**December 15, 2021**

**Shaded Information is Designated Confidential  
per Protective Order in Docket UT-181051**

REDACTED VERSION

**BEFORE THE WASHINGTON  
UTILITIES AND TRANSPORTATION COMMISSION**

***Washington Utilities and Transportation Commission v. CenturyLink  
Communications, LLC***  
**DOCKETS UT-181051**

Public Counsel Data Request No. 2 to Washington Military Department (WMD)

RESPONSES TO PUBLIC COUNSEL DATA REQUEST NO. 2

PC-2 In early 2017, WMD attended a series of meetings with CenturyLink, Comtech, and West Safety Services to discuss technical and contract terms for 911 transition at issue. Please provide for each a narrative that includes the meeting date, location, a description of the attendees, the key points discussed, and the resolutions reached.

**OBJECTION:** WMD objects to the request as overbroad and over burdensome.

**RESPONSE:** Subject to and without waiving the above objection, SECO provides the following response and attachments that will be provided in a STF link (<https://sft.wa.gov/>) link-User name: atg-tpc-php. The password will be sent by separate email.

There were two in-person meetings, multiple emails and several voice conference calls, held which included the State 911 Coordination Office (SECO), a part of the Washington Military Department (WMD), CenturyLink Communications Company, LLC (CTL), Comtech Telecommunications, Inc. (Comtech), and West Safety Services to discuss the technical method to interconnect the two networks for 911 transition.

In July 2016, WMD enter into a contract with Comtech to establish and implement an Emergency Services IP Network (ESInet) with Next Generation 911 Core Services (NGCS), as a replacement for the existing ESInet being provided by CTL, with the core elements being provided by CTL's subcontractor West Safety Services. At that time, all calls for assistance made by dialing 9-1-1 in Washington State were being handed off by the originating service provider to the CTL ESInet for subsequent delivery to a Public Safety Answering Point (PSAP) to determine and affect a response to the call. Because of the existing arrangement for 911 call routing/processing, Comtech made the SECO aware of the necessity for the Comtech ESInet and the CTL ESInet to be interconnected as 911 call routing and processing was transitioned, or migrated, from the CTL ESInet to the Comtech ESInet. Beginning in late July/early August 2016 SECO made CTL aware of the intent to transition from the CTL ESInet to the Comtech ESInet. This was done through a formal notification letter, as well as through emails and telephonic or in-person conversations. To enable the shortest possible communications path between Comtech and CTL, SECO facilitated and authorized direct communications between Comtech and CTL. These actions were taken in accordance with Amendment J and Amendment K of contract E09-196 between WMD and CTL.

By late September 2016, as the scope of the transition became clear to our CTL points of contact, SECO began to receive push-back from CTL indicating that 1) they had not

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received a transition plan from Comtech, and 2) the scope of the transition exceeded the transition requirements agreed upon in the amendments to contract E09-196. As early as late October 2016, Comtech provided CTL with a presentation of its transition plan as well as supporting documentation of Comtech's desired methodology for interconnecting the two ESInets. CTL continued to push-back on both issues – alleging that contract E09-196 was inadequate to the transition that Comtech proposed and that the interconnection methodology could not be supported due to public safety concerns because of their belief that method proposed was non-standard.

Discussions continued into January 2017 until a joint meeting of the parties was agreed to be held. However, CTL and their subcontractor, West Safety Services, refused to meet anywhere but West Safety Services' location in Longmont, CO, unless they were compensated for travel expenses. In order to do this, WMD agreed to Amendment L to contract E09-196, which provided for reimbursement of travel expenses to attend a meeting in Seattle.

On February 28, 2017 and March 1, 2017, a conference was held in a meeting room at Pike Place Market in Seattle. In attendance were technical, business, and leadership representatives of SECO, Comtech, CTL, and West Safety Services. The meetings were focused on how to interconnect the two ESInets, in a manner agreeable to all parties, which would allow the transition from the CenturyLink ESInet to the Comtech ESInet to proceed. The outcome of the meetings on these two days was an agreement in principal to use inter-tandem trunks between the West ECMCs and the Comtech NGCS locations.

The attached PowerPoint was sent to Rebecca Beaton, WA UTC, March 7, 2017 and speaks to attendees, key points discussed, and the resolutions reached. Many details still needed to be worked out and this was done by email and/or voice conference calls between March 2, 2017 and May 30, 2017.

On May 31, 2017 and June 1, 2017, the parties met at Camp Murray, WA. The goal of this meeting was, "to resolve ANY/ALL issues surrounding the transition from ESInet I to ESInet II" and the expectation was, "that we walk away from this meeting in agreement on who is doing what, when and where they are doing it and at how much cost". The cost discussions with all the invitees were limited to who was responsible for which costs. Detailed cost discussions were held separately and only between SECO and Comtech or SECO and CenturyLink. As part of these meetings, the detailed statement of work was discussed line-by-line and finalized by the end of the day May 31, 2017. See attached calendar invitation with attachments.

Contract terms accomplishing the agreement on the transition were reached through email, in-person, or conference call conversations separately between WMD and the two vendors - Comtech and CTL. SECO does not believe West Safety Services was involved in any of the conversations regarding contract terms.

Date Prepared: July 14, 2021

Prepared by: Dawn Cortez/ narrative prepared by William Andrew Leneweaver

Witness: William Andrew Leneweaver

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Phone No. 253-512-7039

Confidential Attachment 2, Transition Plan Presentation  
is Redacted in its Entirety  
(Pages 4 through 72 of Exhibit BR-3C)