

**BEFORE THE WASHINGTON
UTILITIES & TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,

Complainant,

v.

CENTURYLINK COMMUNICATIONS, LLC,

Respondent.

DOCKET UT-181051

BRIAN ROSEN

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

Exhibit BR-11C

Comtech Confidential Response to Public Counsel Data Request No. 8
(Revised September 16, 2021)

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. 1-9 (REVISED)

September 16, 2021

PC8. Was the Comtech IP network providing 9-1-1 service in Washington fully operational throughout the incident, or was it also affected by the incident?

a. If the network was affected, was that communicated to CenturyLink?

RESPONSE:

[REDACTED] provider for 911 call delivery, [REDACTED]

b. Please describe how the outage was communicated to CenturyLink and supply copies of outage/trouble reports.

RESPONSE:

TSYS communicated the outage to CenturyLink by calling CenturyLink’s network operations center (“NOC”) and reporting that specific DS-1 circuits were going up and down or bouncing, a standard industry practice for reporting telecommunications outages. In response, CenturyLink only provided TSYS with a master trouble ticket number for CenturyLink’s entire, nationwide outage.⁶ When TSYS saw significant changes to the impairment situation, such [REDACTED]

[REDACTED] TSYS called and updated the CenturyLink NOC to such changes, referencing CenturyLink’s master trouble ticket number. Many of TSYS’s calls to the CenturyLink NOC were not answered by CenturyLink, and TSYS did not receive updates from CenturyLink with standard levels of detail or regularity. On December 27, 2018, Ruobo Lu, the senior director of TSYS’s NOC, called but was also unable to reach CenturyLink personnel, such as Danielle Mostacciuolo (Client Service Manager), Jeff Blankenship (Manager, Customer Support), Susie Franke (Sr. Manager, Customer Support) and Carlton Schneider (Director, Sales Support), to obtain information on the status of CenturyLink’s nationwide outage.

**Respondents for PC8: Susan Ornstein, Senior Director, Legal & Regulatory Affairs
Todd Poremba, Vice President, Product Management
Ruobo Lu, Senior Director, Network Operations Center**

⁶ Master Ticket No. MC790244. TSYS did not receive any outage/trouble reports from CenturyLink.