

**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-12C

Comtech Confidential Response to Public Counsel Data Request No. 18

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. 10-23

October 6, 2021

PC18. Supply a timeline of the progression of understanding the incident from your point of view went. In this timeline, please note:

a) When did you first receive notice that there were issues?

RESPONSE:

TSYS learned that there were issues [REDACTED] when TSYS received the first Border Gateway Protocol (“BGP”)² alerts [REDACTED]

[REDACTED]

On [REDACTED]
[REDACTED]

b) What steps did you take?

RESPONSE:

TSYS’s NOC called in its top engineers and started an internal troubleshooting bridge at [REDACTED] [REDACTED] TSYS’s engineers immediately started investigating the problems reported by PSAPs.

c) When was CenturyLink made aware of the problems?

RESPONSE:

TSYS cannot be certain as to when CenturyLink first became aware of the problems, but TSYS first reached CenturyLink’s NOC to notify CenturyLink of the issue and attempt to open a trouble ticket [REDACTED] [REDACTED] as an example of the problem.

d) What steps did they take to determine what failed?

RESPONSE:

TSYS cannot speculate as to CenturyLink’s actions.

e) When was it clear that no calls were getting to your system?

RESPONSE:

It became clear to TSYS that no calls were being delivered from ESInet 1 on [REDACTED] [REDACTED] when TSYS received the first telephone call from a PSAP regarding the CenturyLink outage

[Remainder of page intentionally left blank]

² A BGP makes routing decisions based on paths, network policies or rule sets configured by a network administrator.

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f) When was it clear that the problem was in the SS7 network?

RESPONSE:

At [REDACTED] TSYS realized that the problem of 911 calls not coming through was due to an issue with the SS7 network.

g) When was it clear the problem was past the CenturyLink demarc?

Once TSYS realized that the problem of 911 calls not coming through in Washington was due to the SS7 network (with CenturyLink circuits), which was at [REDACTED] TSYS realized the problem was not due to CenturyLink ESInet I being down.

h) When was TNS made aware of the problems?

TSYS is not comfortable speculating as to when TNS was aware of the problem. The TSYS NOC, however, [REDACTED] TNS was already aware of the nationwide CenturyLink outage when TSYS first spoke with TNS.

i) What steps did they take to determine what failed?

TSYS cannot speculate as to the actions of another company.

j) When was it clear the problem was failures in the two DS-3s?

The DS-3s did not fail during the outage.

**RESPONDENTS: Susan Ornstein, Senior Director, Legal & Regulatory Affairs
Todd Poremba, Vice President, Product Management**