

**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-18C

Comtech Response to Public Counsel Data Request No. 4
with Confidential Attachment B.1(b)

December 15, 2021

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

REDACTED VERSION

PC4. The design of the connection between the CenturyLink/Intrado ESInet and the Comtech ESInet was an SS7 interconnect despite both ESInets being IP based.

- a. Please supply copies of correspondence between Comtech and CenturyLink/Intrado as well as between Comtech and WMD about this interface.**

RESPONSE:

TSYS objects on the basis that this request is overly broad and unduly burdensome. Without waiving such objection, TSYS responds as follows:

Attachment B contains copies of correspondence between TSYS and CenturyLink/Intrado, as well between TSYS and WMD, that are responsive to this request. Although TSYS may not have been able to locate every communication with CenturyLink or WMD, TSYS conducted a good faith search of archived correspondence and produced responsive documents found during TSYS's review of such records. In an effort to streamline the materials in this proceeding, TSYS has generally not provided correspondence that other parties have already provided in response to data requests, such as CenturyLink in response to WMD DRs 1-3. Please note that most discussions with CenturyLink and WMD relating to use of IP or SS7 interconnections between ESInet 1 and ESInet 2 took place during in-person, unrecorded meetings in early 2017.

- b. Why was it an SS7 interconnect instead of an IP interconnect?**

RESPONSE:

TSYS initially planned on and sought to use IP interconnection (SIP) between ESInet 1 and ESInet 2. CenturyLink, however, would not interconnect with TSYS using SIP, forcing TSYS to interconnect to ESInet 1 using SS7.¹

- c. Was it initially proposed as IP? If so, why was the design changed?**

RESPONSE:

Yes, the interconnect was initially proposed as IP. The design was changed due to CenturyLink's refusal to interconnect using IP. CenturyLink also refused to interconnect directly, requiring TSYS to utilize a third-party for the SS7 interconnection.²

**Respondents for PC4: Susan Ornstein, Senior Director, Legal & Regulatory Affairs
Todd Poremba, Vice President, Product Management**

¹ See, e.g., Attachment B.1(b) at 3-4.

² *Id.* at 4 (“[REDACTED].”)

Pages 2-8 of Exhibit BR-18C
are Redacted in its Entirety