

**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-16C**

Comtech Confidential Response to Public Counsel Data Request No. 3  
(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

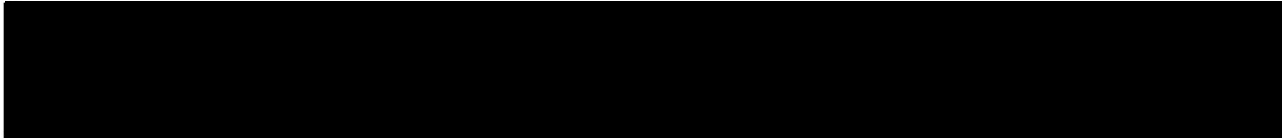
**PC3. Usually, NGCS vendors use multiple suppliers for critical 9-1-1 services.**

**RESPONSE:**

TSYS does not agree with this statement. Supplier diversity is rarely utilized when the NGCS vendor is also a facilities-based carrier, such as CenturyLink or AT&T. Supplier diversity, in fact, may create additional risks because an NGCS provider cannot be certain if multiple suppliers actually share a physical path. Based on TSYS's experience, underlying circuit suppliers often share a physical path at some point in their networks.

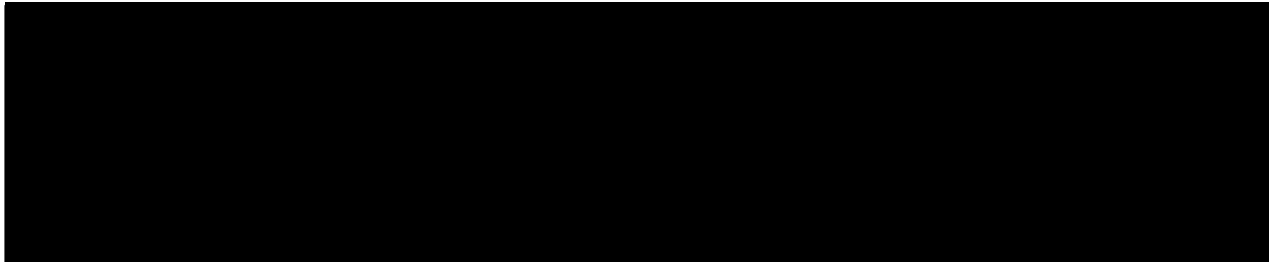
**a. Why were both DS-3s ordered from CenturyLink?**

**RESPONSE:**



**b. Were other suppliers available? If so, why were they not used?**

**RESPONSE:**



**Respondents for PC3: Susan Ornstein, Senior Director, Legal & Regulatory Affairs  
Todd Poremba, Vice President, Product Management**