

**BEFORE THE WASHINGTON  
UTILITIES AND TRANSPORTATION COMMISSION**

**WUTC v. Qwest Corp. d/b/a CenturyLink QC**

**Docket UT-140597**

**RESPONSE OF PUBLIC COUNSEL TO UTC STAFF DATA REQUEST NO. 7**

Request No: 7  
Directed to: Public Counsel  
Date Received: November 20, 2015  
Date Produced: December 4, 2015  
Prepared by: David Bergmann and Thomas Orr

**UTC STAFF DATA REQUEST NO. 7 TO PUBLIC COUNSEL:**

In his testimony dated October 27, 2015, Thomas Orr testifies as follows:

*Q: When did 911 calls resume for NORCOM?*

*A: The answer to this remains unclear. Volumes started to return at approximately 0730 hours (7:30 a.m.), but reports of 911 calls failing continued through to at least 1634 hours (4:34 p.m.).*

Given this testimony, please state whether Public Counsel **disputes** or **agrees with** the following stipulation of fact between Commission Staff and CenturyLink:

*“The outage lasted until 6:06 a.m. PDT on April 10, 2014. The outage duration was six hours and twelve minutes.”* Multiparty Settlement Agreement at 2, ¶ 8.

If Public Counsel **disputes** any fact contained within this stipulation, please explain your disagreement and provide the factual basis for any competing assertion.

**RESPONSE:**

**LEGAL:** Public Counsel sought clarification with respect to the scope of the Data Request and understands that the question is limited to whether Public Counsel disputes the factual assertion in the Multiparty Settlement Agreement that the outage lasted until 6:06 a.m. PDT on April 10, 2014. The response below reflects this understanding.

**WITNESS RESPONSE:** Mr. Orr testifies regarding NORCOM’s experience with respect to the April 2014 911 outage. As Mr. Orr testified, NORCOM’s call volumes “were approaching normal at approximately [7:30 a.m.]” Exhibit No. TRO-1T at 9:3-4. NORCOM, however, cannot conclusively state when call volumes returned to complete normalcy because the 911

community experienced uncertainty beyond the outage period. Exhibit No. TRO-1T at 9:1-3. As shown in Mr. Orr's Exhibit No. TRO-10, at least one King County PSAP in Issaquah reported issues receiving 911 calls into the afternoon of April 10, 2014. It is unclear whether that was due to residual issues from the six-hour outage or if the problems were independent.

Public Counsel does not dispute that the cause of the outage was resolved by 6:06 a.m. on April 10, 2014, when Intrado personnel "performed a manual switch to reroute 911 calls to the Miami ECMC to restore 911 call processing." Exhibit No. DCB-1T at 8:20-21; Exhibit No. DCB-3 at 11. However, Public Counsel recognizes that the PSAPs may have continued to experience issues after the outage was resolved.

Public Counsel's calculation of violations in this case is based on the same six-hour outage period on which Staff based its calculation of violations in its Staff Report, and on which the Multiparty Settlement Agreement is based.