

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

**WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,**

Complainant,

v.

**CENTURYLINK COMMUNICATIONS,
LLC,**

Respondent.

DOCKET UT- 181051

**EXHIBIT TO
TESTIMONY OF**

STACY J. HARTMAN

**ON BEHALF OF
CENTURYLINK COMMUNICATIONS, LLC**

WMD RESPONSES TO DATA REQUESTS CLC 5-7

March 31, 2022

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

***Washington Utilities and Transportation Commission v. CenturyLink
Communications, LLC***
DOCKET UT-181051

CenturyLink Communications, LLC (CLT) Data Requests CTL-5–CTL-7 to Washington
Military Department, State E911 Coordinator’s Office (SECO)

GENERAL OBJECTIONS

SECO incorporates the following general objections into each individual data request response below:

1. SECO objects to each data request to the extent that it seeks or purports to seek information protected by any applicable privilege or immunity, including the Attorney-Client Privilege and Work-Product Doctrine. Any inadvertent production of privileged or work-product protected material is not a waiver of the status of such work product, nor is any response herein to be deemed a waiver of any privilege, doctrine, or immunity.
2. SECO objects to any data request or instruction that purports to require more than is required by the applicable rules of the Commission, including the creation of records that are not currently in existence.
3. SECO objects generally to each data request to the extent (i) that the information requested is known to CenturyLink or its counsel; (ii) the request requires disclosure of information, documents, writings, records, or publications in the public domain; or (iii) the information requested is equally available to CenturyLink or its counsel from sources other than SECO.
4. SECO objects to each data request to the extent that it is overly broad, vague and ambiguous, unduly burdensome, and calling for information that is irrelevant or not proportional to the needs of the case.
5. These responses are provided on the basis of the best information currently available to SECO after diligent effort to gather such information within its possession, custody or control. SECO reserves the right to amend these responses as new information is gathered.

RESPONSES TO CENTURYLINK COMMUNICATIONS, LLC DATA REQUEST

CTL-5 During the 911 transition from CenturyLink to Comtech, did WMD insist upon IP-based interconnection rather than SS7-based interconnection? If your answer is anything other than no, please fully describe WMD’s position (as articulated to Comtech and CenturyLink) and identify all information and produce all documents supporting your response.

RESPONSE:

No, WMD does not think it insisted upon an IP-based interconnection. WMD simply required Comtech to determine how best to interconnect the CenturyLink ESInet with the Comtech ESInet and initialize coordination with CenturyLink to make it happen. Comtech discussed with WMD, the use of an IP-based interconnection and their justification for this was based on NENA NG9-1-1 Transition Plan Considerations Information Document (NENA-INF-008.2-2013), which speaks to the use of IP-based connections. WMD simply accepted their approach as it fit in with all the concepts surrounding the move to a true NG911 system, and supported the approach in discussions with all. This said, as discussions between Comtech, CenturyLink and West/Intrado progressed, Comtech changed their recommendation to utilize SS7/TDM connections instead of IP. Attached TCS_Interconnection_Other_SR_ALI_SPs_rev12 document, dated 10/11/16, outlines how Comtech had originally intended to use IP-based connections to make the interconnection between the two ESInets. As stated above, WMD supported the methodology proposed by Comtech.

Date Prepared: 1/24/2022

Prepared by: AAG Dawn Cortez and William Andrew Leneweaver

Witness: William Andrew Leneweaver

Phone No: 360.586.6470 (new number for AAG Dawn Cortez)

CTL-6 Please characterize and fully describe WMD’s role and involvement in the process and design decisions made among itself, CenturyLink, and Comtech throughout the transition from CenturyLink being the state’s 911 provider to Comtech being the state’s 911 provider.

RESPONSE:

WMD believes its role in design was minimal, beyond what was specified in the RFP. In fact, RFP-16-GS-NG911, in part, says, “. . . it is not the intent of this RFP to provide implementation details that would limit the BIDDER’s solution to one particular technology.” Comtech continually presented WMD with its design and implementation plans to gain WMD’s concurrence. This was anticipated and appreciated throughout the project. When Comtech and CenturyLink could not reach an agreement on how to interconnect the two networks, WMD attempted to facilitate and mediate the interconnection design discussions, but WMD relied upon these two contractors to meet the terms of their separate agreements with WMD. Upon agreement by all parties to meet in person and work together to arrive at a solution mutually agreeable, WMD, to include the technical staff of the State 911 Coordination Office, were present to continue facilitating the discussion. The Telecommunications Engineer in the State 911 Coordination Office mediated the telecommunications engineers to arrive at a mutually agreeable solution. Over the course of several months, Comtech, CenturyLink, and CenturyLink’s subcontractor Intrado, worked together to further develop and refine the interconnection solution, which culminated in a formal presentation by all parties to WMD. At the conclusion of the presentation, WMD accepted the solution for

implementation. The level of collaboration described above, continued for the most part, throughout the transition.

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CTL-7 At page 29 of his Direct Testimony, Mr. Rosen states that “WMD, however, confirms that the contract documents do not identify any specific demarcation point, *and that WMD understood the demarcation point to be the Comtech RCL...*” (emphasis added)

- a. Does WMD contend that it has always (since 2017) believed that the Comtech RCL was the demarcation point? Please fully explain your response.
- b. Produce all documents that support or relate to WMD’s understanding as to the location of the demarcation point.

RESPONSE:

a. For the Comtech ESInet, the demarcation point for Originating Service Providers (OSPs, sometimes referred to as CSPs) to ingress their customer’s 911 calls to the Washington State ESInet are the Points of Interface (POIs). During the migration of the OSFs to the Comtech ESInet, every OSP was required to establish connections to at least two of the POIs—one East of the Cascade range and one West of the Cascade range—for diversity and redundancy. These POIs were established by NoaNet, under the contract between Comtech and WMD, to ensure diversified access for the OSFs to the Comtech ESInet ingress gateways.

In the network provided by CenturyLink/Intrado, CenturyLink/Intrado identified the demarcation points for the OSP customer’s 911 calls as the legacy network gateways (LNGs) provided by Intrado and every OSP was required to connect to those. See attached Qwest network disclosure.

WMD understood that the purpose of interconnecting the two ESInets was for CenturyLink to pass original 911 calls to the Comtech ESInet. Because of CenturyLink’s insistence that the demarcation points, for original 911 calls entering the CenturyLink ESInet, were the LNGs, and Comtech’s identification of the Comtech ESInet ingress gateways—shown as the Comtech RCLs on the drawing provided by CenturyLink—as the demarcation points, for original 911 calls entering the Comtech ESInet, WMD simply assumed the demarcation points for the interconnecting trunks were the Comtech ESInet ingress gateways—shown as the Comtech RCLs on the drawing provided by CenturyLink. WMD believes this was a valid assumption, since no specific demarcation points were identified for the interconnecting trunks.

b. Attached is the only document which supports WMD's understanding of the demarcation point, and the same as referenced in a. above. While this document does not directly relate to the question about the demarcation point of the interconnecting trunks, the document does illustrate how CenturyLink identified the demarcation point for the OSPs and allowed for WMD to make the assumption it did.

Date Prepared: 1/24/2022

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