

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,

Complainant,

v.

CENTURYLINK COMMUNICATIONS, LLC,

Respondent.

DOCKET UT-181051

RESPONSE TESTIMONY

OF

VALERIE LOBDELL

ON BEHALF OF

CENTURYLINK COMMUNICATIONS, LLC

March 31, 2022

TABLE OF EXHIBITS

EXHIBIT VL-2: NOVEMBER 2016 CORRESPONDENCE (CENTURYLINK/WMD/COMTECH)

EXHIBIT VL-3C: DRAFT NEXT GENERATION 9-1-1 EMERGENCY SERVICES INTERNET PROTOCOL
NETWORK TRANSITION FROM ESINET I TO ESINET II SCOPE OF WORK

1 **I. BACKGROUND AND SUMMARY OF TESTIMONY**

2 **Q. PLEASE STATE YOUR NAME AND SUMMARIZE YOUR CURRENT ROLE AT**
3 **LUMEN.**

4 **A.** My name is Valerie Lobdell and I am Senior Lead Program Manager in Lumen’s Strategic
5 Enterprise and Public Sector organization. In this role, my responsibilities include program
6 management for a single enterprise customer that supports government services.
7 Additionally, I am responsible for supporting the account team that oversees billing,
8 purchasing, service quality and other special issues that arise for the customer.

9 **Q. PLEASE DESCRIBE YOUR EDUCATION AND SPECIALIZED TRAINING.**

10 **A.** I earned a Bachelor in Arts (majored in Art, minored in History) in 1991 from Azusa
11 Pacific University. In 2014, I received a project manager professional certification from
12 the Project Management Institute.

13 **Q. PLEASE SUMMARIZE YOUR WORK EXPERIENCE AT LUMEN AND ITS**
14 **PREDECESSORS.**

15 **A.** I have over 20 years of experience in the telecommunications industry, over ten of which
16 have been devoted to 911 projects. Beginning in 1995, I was employed as a service
17 delivery coordinator for large business customers for U S WEST. In 2000, I transitioned to
18 being an account consultant for large business customers for Qwest. From 2005-2015, I
19 worked as a project manager for Qwest/CenturyLink. In that role, I worked primarily on
20 911-related projects for the western region. I was contracted back in 2017 as an outside
21 consultant to assist the company with the Washington 911 transition from CenturyLink to
22 Comtech. I remained a consultant for approximately three years (2017-2020). Later In

1 2020, I rejoined CenturyLink/Lumen as a full-time employee supporting the federal
2 enterprise department. My current job does not directly involve 911 services.

3 **Q. HAVE YOU TESTIFIED BEFORE THIS COMMISSION OR ANY OTHER**
4 **REGULATORY AGENCY?**

5 **A.** I have not.

6 **Q. CAN YOU PROVIDE A BRIEF SUMMARY OF YOUR RESPONSE TESTIMONY?**

7 **A.** My testimony provides a brief description of the transition of 911 services in Washington
8 from CenturyLink to Comtech, and specifically responds to Public Counsel's inaccurate
9 testimony that CenturyLink compelled network design decisions related to the transition.

10 **Q. HAVE YOU READ THE DIRECT TESTIMONY OF PUBLIC COUNSEL'S**
11 **WITNESSES STEPHANIE CHASE AND BRIAN ROSEN?**

12 **A.** I have read selected portions of Public Counsel's testimony. Specifically, at the direction
13 of CLC counsel, I reviewed pages 4-5 and 17 of Ms. Chase's testimony and pages 4-5 and
14 22-31 of Mr. Rosen's testimony. My testimony is narrowly focused on the transition of
15 911 services from CenturyLink to Comtech, and I have only reviewed the Public Counsel
16 testimony excerpts that relate to that issue.

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1 **II. TRANSITION OF 911 SERVICES FROM CENTURYLINK TO**
2 **COMTECH**

3 **Q. WERE YOU DIRECTLY INVOLVED IN CENTURYLINK'S BID IN RESPONSE**
4 **TO WMD'S 2016 REQUEST FOR PROPOSAL?**

5 **A.** No.

6 **Q. ONCE WMD AWARDED THE 911 CONTRACT TO COMTECH, WERE YOU**
7 **DIRECTLY INVOLVED IN THE TRANSITION?**

8 **A.** Not immediately, but I was brought in fairly early in the process to project manage the
9 transition from CenturyLink's side. My roles in the transition were to attend weekly
10 meetings, help facilitate communication in the development of the SOW to transition the
11 services, facilitate getting a signed contract to begin the transition work, facilitate and track
12 the CenturyLink tasks for the transition services to fulfill CenturyLink's responsibilities in
13 the SOW, and provide weekly progress reports.

14 **Q. PLEASE PROVIDE A HIGH LEVEL DESCRIPTION OF THE WASHINGTON 911**
15 **TRANSITION.**

16 **A.** It is my understanding that CLC witness Carl Klein provides a detailed summary of the
17 structure of the transition. Comtech and the Washington Military Department ("WMD")
18 insisted that we integrate the CenturyLink and Comtech 911 networks and migrate the 911
19 services in a three-phased approach.

1 **Q. DID CENTURYLINK PROPOSE THIS THREE PHASE TRANSITION**
2 **APPROACH?**

3 **A.** No, it did not. In fact, CenturyLink had and expressed (prior to my re-joining the
4 company) concern about a phased approach where (for some extended period of time)
5 CenturyLink would still be in the call flow for calls destined to PSAPs that had already
6 migrated to Comtech.¹ The CenturyLink team was unaware of any prior implementation of
7 a phased approach like the one Comtech and WMD proposed for a 911 carrier transition.
8 From CenturyLink's perspective, it was unnecessarily complicated and introduced
9 unknown risks. CenturyLink believed that Comtech (having been awarded the 911 contract
10 from WMD) should be able to stand up its own 911 network and databases and require
11 service providers to migrate their 911 traffic to Comtech. Instead, Comtech relied on
12 CenturyLink's network to support Comtech's transition as the new 911 service provider.
13 This created more potential points of failure, and from CenturyLink's perspective would
14 likely make network issues harder to troubleshoot. CenturyLink expressed this concern
15 directly to Comtech and WMD, but they ignored the concerns and decided upon the phased
16 approach

17 The phased approach was a major component of the transition plan agreed upon between
18 Comtech and WMD without involving CenturyLink despite CenturyLink being an integral
19 and necessary participant and despite the fact that CenturyLink would be required to
20 expend hundreds of labor hours.

21 Comtech, WMD, Intrado/West (CenturyLink's 911 vendor) and CenturyLink met in Seattle
22 in February 2017 to discuss whether the Comtech/WMD phased approach was technically

¹ Attached as Exhibit VL-2 is email correspondence between WMD and CenturyLink from November 2016 in which CenturyLink expressed concerns with the phased approach.

1 viable. Both Carl Klein and I (among others) attended on behalf of CenturyLink. We
2 worked through the major outline of the design and determined it was technically possible
3 to support Comtech’s phased approach even if it was not CenturyLink’s preference.
4 CenturyLink and West worked together through their legal departments and experts to
5 determine if we would support the solution and what the terms of the solution would be.
6 Comtech provided a revised Scope of Work (“SOW”) and all parties worked on redlines
7 and agreed to the design and plan. In July 2017, the contract and SOW were signed by
8 WMD and CenturyLink. A copy of the contract (Amendment M) and SOW are attached to
9 the Response Testimony of Stacy Hartman as Exhibit SJH-9C.

10 **Q. HOW DOES PUBLIC COUNSEL CHARACTERIZE CENTURYLINK’S ROLE IN**
11 **THE TRANSITION PLANNING AND EXECUTION?**

12 **A.** Public Counsel testifies that CenturyLink compelled design decisions during the 911
13 transition, including specifically that CenturyLink forced Comtech and WMD to accept
14 SS7/TDM (rather than IP) interconnection of the two companies’ ESInets. Citing
15 Mr. Rosen as her source, Ms. Chase testifies: “CenturyLink insisted upon using particular
16 technology, over the objection of Comtech, and designed the interconnection in such a way
17 that made the consequences of the Washington 9-1-1 outage more severe.”²

18 Mr. Rosen makes similar assertions. He testifies:

19 * “CenturyLink made a series of design and implantation decisions during the
20 transition of the 9-1-1 system to Comtech that exacerbated the impact of the

² Direct Testimony of Stephanie K. Chase (Dec. 15, 2021), Exhibit SKC-1Tr (“Chase Direct”), at 4-5. Ms. Chase seems to return to this assertion when she testifies (again citing only Mr. Rosen as her source) “Public Counsel’s analysis, supported by the contracts between the Company and WMD, shows that CenturyLink was responsible for the design of the system and obligated as a covered service provider at the point where the failure occurred.” Chase Direct, at 17.

1 nationwide outage on Washington’s 9-1-1 service. *CenturyLink required the use*
2 *of outdated technology to interconnect the two companies during the transition,*
3 *which subjected the connection to known failures of the older technology.”³*

4 * “Despite both ESInets being IP-based documents show *CenturyLink insisted that*
5 *this interconnect be SS7-based.* This design required a conversion between IP on
6 the Intrado IP network to SS7, and then required another transition between SS7
7 and IP on the Comtech IP network for all calls traveling over the interconnect
8 from the CenturyLink/Intrado ESInet to the Comtech ESInet. In other words,
9 once call information came to the interconnect in one format, *CenturyLink’s*
10 *choice of SS7* required that it be translated into another format, put through the
11 interconnect, and then translated back to the original format on the other side.”⁴

12 * “*The December 2018 9-1-1 system failure occurred because CenturyLink insisted*
13 *on using an SS7-based system to interconnect with Comtech* and because all four
14 signaling links in the interconnect used the Infinera network.”⁵

15 * “The only reason Comtech and CenturyLink were connected using an SS7 was
16 *because CenturyLink refused to use an IP-based connection.* *The design of the*
17 *connection between the two companies was not Comtech’s preferred solution and*
18 *was driven by CenturyLink.”⁶*

19 * “I believe that well before the outage event, *CenturyLink made a series of*
20 *decisions and deliberately carried out a sequence of actions it should not have.*

³ Direct Testimony of Brian Rosen (Dec. 15, 2021), Exhibit BR-1CTr (“Rosen Direct”), at 4-5 (citations omitted; emphasis added).

⁴ Rosen Direct, at 22-23 (citations omitted; emphasis added).

⁵ Rosen Direct, at 24-25 (emphasis added).

⁶ Rosen Direct, at 26 (citations omitted; emphasis added).

1 These decisions and actions resulted in the network failure impacting
2 Washington’s 9-1-1 system much more severely that it could have.”⁷

3 * *“The most serious mistake CenturyLink made was to insist that it connect its*
4 *system to Comtech’s system using old SS7 technology.... WMD and CenturyLink*
5 *clearly recognized the superiority of IP networks for modern 9-1-1 systems, and*
6 *that the entire nation was—and still is—switching from SS7 to IP. By nonetheless*
7 *insisting that its system interconnect be SS7 despite Comtech’s objections,*
8 *CenturyLink subjected the 9-1-1 interconnect to all of SS7’s well-known*
9 *failures.”*⁸

10 **Q. IS PUBLIC COUNSEL CORRECT THAT CENTURYLINK COMPELLED**
11 **COMTECH TO UTILIZE SS7 INTERCONNECTION?**

12 **A.** Absolutely not. CenturyLink was not solely in control of any aspect of the transition.
13 WMD made its choice of 911 provider by selecting Comtech as CenturyLink’s successor.
14 WMD tasked Comtech with project managing the transition. WMD, Comtech,
15 CenturyLink and Intrado/West worked closely together, in excruciating detail, to map out
16 the transition. While I no longer have access to my emails from that time period, the
17 transition planning involved hundreds (likely thousands) of emails, numerous virtual and
18 in-person meetings and many iterations of the draft SOW. Comtech, as project manager,
19 tracked the stakeholders’ efforts, discussions and decisions. They circulated redlined
20 versions of the SOW, an example of which is attached as Exhibit VL-3C.

⁷ Rosen Direct, at 30 (emphasis added).

⁸ Rosen Direct, at 30-31 (citations omitted; emphasis added).

1 **Q. CAN YOU PROVIDE MORE DETAIL ABOUT HOW COMTECH PROJECT**
2 **MANAGED THE TRANSITION PROCESS?**

3 **A.** Yes. Comtech's project manager (initially, Courtney Wilson, and later Rebecca Yeatman)
4 would set meetings, send meeting minutes and action items, provide input/agreement to the
5 transition SOW document, keep and update the timeline schedule, schedule PSAP
6 migrations, and develop/document migration methods of procedure. We would have
7 weekly meetings with Comtech, WMD, CenturyLink and West and discuss current project
8 progress, issues and timeline. The SOW that detailed the transition project was a document
9 edited by all parties (WMD, Comtech, West, CenturyLink) and once all parties agreed on
10 the content it was attached to Amendment M between WMD and CenturyLink. During the
11 design of the transition plan, the SOW was reviewed and edited and discussed numerous
12 times by all parties until mutual agreement was reached. If there was a request for a design
13 change after the SOW was finalized, it would be discussed with all parties. WMD would
14 then send in a change control form, and if it impacted CenturyLink's work items or added
15 to them, it would be reviewed by CenturyLink/West to determine impact to the contract,
16 timeline, cost and capability and then a response would be reviewed. In the end, a decision
17 would be made about whether or not to move forward. Overall, transition planning was a
18 complicated, but cooperative process.

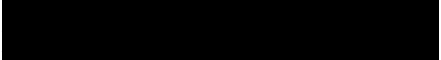
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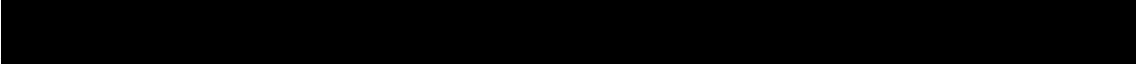
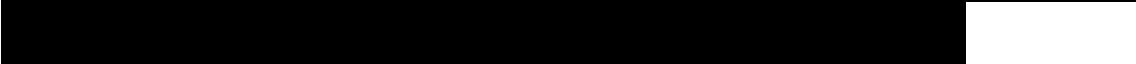
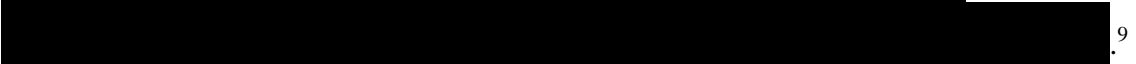
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2 **Q. DO YOU REMEMBER THE DISCUSSIONS AMONG COMTECH,**
3 **CENTURYLINK, INTRADO AND WMD ABOUT WHETHER THE TWO**
4 **ESINETS SHOULD BE INTERCONNECTED VIA SS7/TDM OR IP**
5 **TECHNOLOGY?**

6 **A.** As I discuss above, my first recollection is that CenturyLink expressed concerns about the
7 two networks being interconnected at all. CenturyLink believed that Comtech should stand
8 up its own 911 network and databases and migrate service providers to the Comtech
9 network. Despite CenturyLink's concerns, the phased transition proceeded. To the best of
10 my recollection, we discussed the SS7 interconnection solution (as well as many other
11 technical design items) at the onsite meeting in Seattle and all attending parties
12 unanimously agreed that it was a viable solution. 

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16 **III. CONCLUSION**

17 **Q. DOES THIS CONCLUDE YOUR RESPONSE TESTIMONY?**

18 **A.** Yes.

⁹ See Response Testimony of Stacy Hartman, Exhibit SJH-5C.