

**Exh. MLT-2
Docket UT-190209
Witness: Michael L. Turcott**

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

**WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,**

Complainant,

v.

**QWEST CORPORATION d/b/a
CENTURYLINK QC,**

Respondent.

DOCKET UT-190209

EXHIBIT TO TESTIMONY

OF

Michael L. Turcott

**STAFF OF
WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION**

Commission Staff Investigation Report – CenturyLink – April 2019

October 25, 2019



UT-190209
INVESTIGATIVE
REPORT
CENTURYLINK

ABSTRACT

Staff investigation to determine if CenturyLink committed violations of RCW 80.36.080, Rates, services, and facilities, and WAC 480-120-450(1), Enhanced 911 obligations of local exchange companies

AUTHOR

Michael Turcott, Compliance
Investigator Consumer Protection

Table of Contents

Purpose, Scope, and Authority.....	Page 3
Executive Summary.....	Page 4
Background.....	Page 6
Investigation.....	Page 7
Recommendations.....	Page 11
Appendices:	
Appendix A: CenturyLink’s log of PSAP notifications.....	Page 14
Appendix B: Washington Military Department’s email dated July 12, 2017.....	Page 25
Appendix C: CenturyLink’s email dated July 14, 2017.....	Page 26
Appendix D: Data request to CenturyLink dated Aug. 25, 2017.....	Page 27
Appendix E: CenturyLink’s original and revised summaries of the outage.....	Page 29

PURPOSE, SCOPE, AND AUTHORITY

Purpose

The purpose of this staff investigation was to determine whether CenturyLink Communications LLC (CenturyLink or company) complied with Washington state law and the Washington Utilities and Transportation Commission's (commission) public safety rules during a July 2017 outage of portions of the state's emergency 911 system. This outage lasted nearly three hours and affected a large area of western Washington.

Scope

This investigation focused on CenturyLink's business practices related to failed calls to 911 in the state of Washington and CenturyLink's communication of the outage to the public-safety answering points (PSAPs) and media.

Authority

Staff undertook this investigation pursuant to Revised Code of Washington (RCW) 80.01.040 (General power and duties of commission), which grants the commission authority to regulate in the public interest and regulate the rates, services, facilities, and practices of all entities operating under public service laws, and 80.04.070 (Inspection of books, papers, and documents), which grants the commission authority to investigate public service companies. Staff also conducted this investigation pursuant to RCW 80.04.380 (Penalties – Violations by public service companies), which authorizes the commission to penalize public service companies for violations of state law, commission rules, and other requirements.

Staff

Michael Turcott, Consumer Protection
(360) 664-1174
mike.turcott@utc.wa.gov

EXECUTIVE SUMMARY

On July 12, 2017, Washington residents experienced a widespread, partial outage of the state's 911 system, which severely disrupted emergency and public safety communications. The 911 system partially failed at 5:52 a.m. on July 12, 2017, and was restored nearly three hours later, at 8:39 a.m. The outage resulted in the failure of 222 calls to 911.

Staff undertook this investigation to determine whether CenturyLink complied with the requirement to provide 911 service.

Staff also considered:

- Whether CenturyLink complied with the requirement to promptly and effectively notify affected customers and stakeholders during the outage; and
- Whether CenturyLink complied with the requirements of the San Juan County Outage Communications Plan and the Washington State Outage Communications Plan.

The root cause of the outage is known, but this investigation did not otherwise address the specific system and technical aspects that led to the 911 service failure.

Staff Findings

CenturyLink's 911 vendor, West (formerly Intrado), operates two Emergency Communications Management Centers (ECMCs), located in Englewood, Colorado, and Miami, Florida. A failed software update in the Englewood ECMC during the early morning hours of July 12, 2017, disrupted delivery of automatic number identification (ANI), automatic location identification (ALI), and voice carrier traffic. This caused the ECMC to reject 222 911 calls from eight unique wireline numbers and 140 unique mobile numbers

CenturyLink first notified 28 of the 29 PSAPs that were potentially affected by the outage by email on July 12, 2017, at 3:50 p.m., more than five hours after the outage was restored.¹ CenturyLink first notified the 29th PSAP (Washington State Patrol – King County), also by email, on Aug. 4, 2017, 25 days after the outage.²

Staff found that Washington residents were denied access to vital emergency services during the nearly three-hour outage. Staff will never know exactly how many Washington residents lost access to 911. Staff found, however, that out of 1,405 emergency calls placed to 911 in Washington during the outage, 222 did not go through. In addition, staff found that CenturyLink failed to provide timely notification to the commission, PSAPs, and county and state emergency management officials.

¹ Twenty-nine PSAPs were potentially affected by the outage. Nineteen PSAPs actually experienced failed 911 calls.

² See Appendix A for a copy of CenturyLink's log of PSAP notifications.

As a result of this investigation, staff finds that CenturyLink committed 222 violations of Revised Code of Washington (RCW) RCW 80.36.080, requiring provision of modern, adequate, sufficient, and efficient service and facilities, and of Washington Administrative Code (WAC) 480-120-450(1), requiring the provision of enhanced 911 (E911) service.

Staff's investigation found that no single PSAP suffered a total loss of service, and there was no disruption of local exchange or toll services to more than one thousand customers. Accordingly, this incident does not rise to the level of a "major outage" as defined in WAC 480-120-021.³ Therefore, the notification requirements of WAC 480-120-412(2) and (3), and the Washington State and San Juan County Outage Communication Plans adopted by Order 05 in Docket UT-132234, did not apply. Nevertheless, staff is concerned about the company's continued pattern of lack of timely notification related to this and similar incidents, which occurred in 2013, 2014 and 2016.⁴

Penalty Recommendation

Staff recommends the commission issue a formal complaint against CenturyLink and, because of the company's continuing pattern of system failures, assess a penalty of up to the statutory maximum of \$1,000 for each of the 222 violations (222 failed 911 calls) of RCW 80.36.080, Rates services, and facilities, and WAC 480-120-450(1), Enhanced 911 obligations of local exchange companies.

³ WAC 480-120-021 defines a major outage as "a service failure lasting for thirty or more minutes that causes the disruption of local exchange or toll services to more than one thousand customers; total loss of service to a public safety answering point or emergency response agency; intercompany trunks or toll trunks not meeting service requirements for four hours or more and affecting service; or an intermodal link blockage (no dial tone) in excess of five percent for more than one hour in any switch or remote switch."

⁴ Staff is currently investigating a major 911 outage involving CenturyLink which occurred in December, 2018.

BACKGROUND

Company Information

CenturyLink is the major Incumbent Local Exchange Carrier (ILEC) offering telephony, data, and other services in the state of Washington, with gross intra-state combined annual revenue of \$399,409,239 in 2017. Additionally, at the time of the outage, CenturyLink had statewide responsibility for the underlying elements of the state's 911 system, including 911 call processing.

Compliance History and Communications Plans

San Juan Island County – Docket UT-132234

On Nov. 5, 2013, a telephone cable was severed between Lopez and San Juan Islands in San Juan County, Washington, resulting in a 10-day interruption of all long distance and 911 services. The commission penalized CenturyLink \$173,210, with all but \$50,000 suspended, for violations of WAC 480-120-412, related to notification requirements of a major outage.

As part of a settlement agreement, CenturyLink agreed to collaborate on and produce emergency communications plans for San Juan County and for the state of Washington. The purpose of the plans is to ensure CenturyLink complies with the commission's notification requirements for major outages as found in WAC 480-120-412. The commission approved both plans in Order 05, entered May 2, 2016.

Englewood, Colorado, Switch Failure – Docket UT-140597

On April 9 and 10, 2014, a switch failure in Englewood, Colorado, caused a statewide outage of Washington's 911 system. The 911 system failed at 11:54 p.m. on April 9, 2014, and was restored just over six hours later, at 6:06 a.m., on April 10, 2014. This outage affected all 39 Washington counties, 56 primary PSAPs, and 12 secondary PSAPs.

On Feb. 22, 2016, in Order 03, the commission approved a settlement agreement in which CenturyLink admitted to violations of RCW 80.36.080, Rates, services, and facilities; WAC 480-120-450, Enhanced 911 (E911) obligations of local exchange companies; and WAC 480-120-412, Major outages; and agreed to pay penalties in the amount of \$2,854,750.

The Dalles, Oregon Switch Failure

On Nov. 6, 2016, CenturyLink experienced a switch failure in The Dalles, Oregon, which resulted in an outage of 911 services over a two day period, affecting 100,000 customers in Klickitat and Skamania counties. CenturyLink failed to notify the commission or the State E911 Coordinator's Office within the Emergency Management Division of the Washington Military Department until 28 hours after the outage occurred. This violated WAC 480-120-412 and the Washington State Outage Communications Plan. As a result, on June 1, 2017, the commission entered Order 06 in Docket UT-132234, which imposed suspended penalties from the San Juan outage proceeding in the amount of \$123,210.

INVESTIGATION

On Wednesday, July 12, 2017, at 4:31 p.m., the Washington Military Department notified commission staff by email of a failure of the 911 system involving 222 failed 911 calls in the state of Washington that had occurred earlier that day. The email was sent to a large distribution group and stated that a service disruption in the West ECMC in Englewood, CO, resulted in as many as 222 failed 911 calls.⁵

Two days later, on Friday, July 14, 2017, CenturyLink sent an email notification to commission staff as a “courtesy notification of non-major outage,” stating “West (formerly Intrado) did a system upgrade / reboot on Wednesday morning that caused potential issues with more than 200 911 calls in the state of Washington.”⁶

Data Request

On Aug. 25, 2017, staff sent a data request to CenturyLink requesting the following information:⁷

- CP1: The number of affected customers, identified by customer type (commercial or residential), and CenturyLink services affected.
- CP2: A list of every failed 911 call, including the full telephone number.
- CP3: All communication with Washington’s Primary Public Safety Answering Points (PSAPs) who were impacted by this outage.
- CP4: Documentation of all call backs related to the failed calls.
- CP5: A chronology of all internal communications related to the outages, including summaries of phone calls, and copies of any emails or other written correspondence.
- CP6: A chronology of all communications with stakeholders related to the outages, such as commission staff, other government agencies, the media, and the public. Summaries of phone calls and copies of any emails or other written correspondence.
- CP7: A chronology of service restoral by location, number of customers, and service type.
- CP8: A summary of any credits for the outages.

CenturyLink responded to staff’s data request on Sept.13, 2017. The company requested, and was granted, an extension to respond to CP5 until Sept. 25, 2017. The company submitted an amended response to CP1 on Oct.9, 2017. CenturyLink’s responses are summarized below:

⁵ See Appendix B for a copy of Washington Military Department’s email, dated July 12, 2017.

⁶ See Appendix C for a copy of CenturyLink’s email, dated July 14, 2017.

⁷ See Appendix D for a copy of data request to CenturyLink, dated Aug. 25, 2017.

CP1: The number and type of affected customers, and service affected.

In its response, CenturyLink reported that the outage affected 911 service to 29 PSAPs. During the affected period, 222 (16%) of the 1,405 calls attempted to 911 failed. Eight of the failed calls were from unique wireline telephone numbers, and 140 were from unique wireless numbers.

In its response to CP1, the company included a letter it had submitted to the commission on Aug. 11, 2017, in response to data requests received from UTC Regulatory Services staff on July 17 and 24, 2017. In the letter, identified by CenturyLink as Exhibit CP1-1, the company explained that the outage began on July 12, 2017, at 5:52 a.m. and ended at 8:39 a.m., for a duration of two hours and 47 minutes.⁸

The letter contained a list of 29 potentially affected PSAPs, with 19 of them marked with an asterisk indicating the PSAP had experienced missed 911 calls. The outage caused failed 911 calls to the following 19 PSAPs:

- | | |
|--------------------------------------|---|
| 1. Clallam County (Pencomm) | 11. Skagit County |
| 2. Clark Regional Emergency Services | 12. Skamania County Sheriff's Office |
| 3. Cowlitz County 9-1-1 | 13. SNOCOM – Snohomish County |
| 4. Jeffcom 9-1-1 Communications | 14. South Sound 911 |
| 5. King County Sheriff | 15. Thurston County – CAPCOM |
| 6. Kitsap County | 16. Valley Communications Center |
| 7. Klickitat County Sheriff's Office | 17. Washington State Patrol – King County |
| 8. Lewis County 9-1-1 | 18. Washington State Patrol – Tacoma |
| 9. NORCOM – King County | 19. What-Comm Communications Center |
| 10. Seattle Police Department | |

The outage also potentially affected the following 10 PSAPs; however, no failed 911 calls were documented:

- | | |
|-------------------------------------|---------------------------------------|
| 1. Bothell Police Department | 6. Puyallup Communications |
| 2. Grays Harbor Communications | 7. Redmond Police Department |
| 3. Island County Emergency Services | 8. San Juan County Sheriff's Office |
| 4. Mason County | 9. SNOBAC – Snohomish County |
| 5. Pacific County Communications | 10. Wahkiakum County Sheriff's Office |

CP2: A list of every failed 911 call, including the full telephone number.

CenturyLink provided lists of the failed wireline and wireless calls. According to CenturyLink, 148 unique callers attempted to make 222 calls to 911. This means that some callers attempted to call 911 more than once.

⁸ See Appendix E for a copy of CenturyLink's original and revised summaries of the outage.

CP3: All communication with Washington’s Primary Public Safety Answering Points (PSAPs) who were impacted by this outage.

CenturyLink provided copies of its initial and final notifications to the 29 affected PSAPs. CenturyLink did not notify the PSAPs until after restoral of service, and a single email notification from CenturyLink served as both the initial and final notification. Twenty-eight PSAPs were notified at approximately 3:50 p.m., on July 12, 2017, more than seven hours after the outage was restored. The 29th PSAP, Washington State Patrol – King County, was notified on August 4, 2017, 23 days after the outage was restored.

CP4: Documentation of all call backs related to the failed calls.

CenturyLink stated in its response that it does not perform callbacks on failed 911 calls. The company does provide a log of failed to calls to PSAPs to make call backs at their discretion. CenturyLink stated that it provided the call log to the PSAPs on July 13, 2017, at approximately 10:00 a.m., more than 24 hours after the outage was restored.

CP5: A chronology of all internal communications related to the outages, including summaries of phone calls, and copies of any emails or other written correspondence.

CenturyLink provided a log of internal correspondence as requested. The first internal communication listed occurred on July 12, 2017, at 1:21 p.m., Mountain Time (12:21 p.m., Pacific Time) and was an email from CenturyLink staff notifying the “internal team” of the outage.

CP6: A chronology of all communications with stakeholders related to the outages, such as commission staff, other government agencies, the media, and the public. Summaries of phone calls and copies of any emails or other written correspondence.

CenturyLink provided copies of communication with UTC staff and the FCC. CenturyLink did not provide documentation of any communications with the media or the public regarding this outage. Because this incident was not a major outage as defined in WAC 480-120-021, the notification requirements found in WAC 480-120-412 and the company’s communications plans do not apply.

CP7: A chronology of service restoral by location, number of customers, and service type.

CenturyLink reported that the partial outage began July 12, 2017, at 5:52 a.m., and impacted 911 service. The issue that impacted the trunks was resolved on July 12, 2017 at 8:39 a.m., at which time access to 911 was no longer impaired. This was the case for all locations, all customers, and all end-user services.

CP8: A summary of any credits for the outages.

According to CenturyLink, the issues with accessing 911 on July 12, 2017, do not meet their criteria for end-user credits. Therefore, no record of end-user, or consumer, credits exists.

Findings

The 911 system is a vital part of Washington's emergency and public safety services to the people of Washington. CenturyLink's failure deprived Washingtonians of the most basic telecommunications service, which is the ability to dial 911 and reach emergency services. The company is required by Washington statute to provide service and facilities that are safe, modern, sufficient, and efficient. RCW 80.36.080. As a result of this investigation, staff concludes that CenturyLink and its 911 vendor did not meet the standards required for providing safe and efficient 911 service and deprived Washington callers of the ability to place a 911 call. Staff finds 222 violations of RCW 80.36.080, Rates services, and facilities, and of WAC 480-120-450, Enhanced 911 (E911) obligations of local exchange companies, for 222 failed 911 calls.

RECOMMENDATIONS

Staff's investigation finds that CenturyLink's 911 system failed due to a foreseeable and preventable technical error and related deficiencies. As a result, the residents of Washington state lost access to 911 services for almost three hours. Staff believes that the severity of the outage and the risk it posed to the public warrants a substantial penalty.

Per the Enforcement Policy of the Washington Utilities and Transportation Commission, (Docket A-120061), commission staff considered the following factors in determining the appropriate recommended penalty amount for these violations:

1. **How serious or harmful the violations are to the public.**

This partial outage lasted nearly three hours and impacted the most populous counties in the Puget Sound region. In this case, the potential impact was mitigated only by the fact that no major natural or human-caused disasters or incidents occurred during the timeframe of the outage.

Not being able to reach 911 is a serious and potentially life-threatening event. It is impossible to know the true extent of harm to the public; however, we know that 148 individual customers attempted 222 calls to 911 and were unsuccessful. The fact that 74 of the calls were repeat calls suggests the urgent need for those customers to get through to emergency services.

The duration or extent of a 911 outage is of no interest to the individual caller who needs help in an emergency. Each call must go through. The failure of even a single call is potentially very harmful and is of great concern.

2. **Whether the violations were intentional.**

Considerations include:

- Whether the company ignored commission staff's previous technical assistance; and
- Whether there is clear evidence through documentation or other means that shows the company knew of, and failed to correct the violations.

Although the outage itself was unintentional, evidence suggests that it was preventable. CenturyLink's vendor, West, attempted a software configuration change at the Englewood ECMC that failed and caused this partial 911 outage. The commission issued significant penalties against CenturyLink in Docket UT-140597 after a software failure at Englewood caused a massive 911 outage in April 2014. By failing to ensure that its vendors properly test software configuration changes before implementation and have redundancy in place to prevent future failures, CenturyLink allowed this outage to occur.

3. **Whether the Company self-reported the violations.** The company did not self-report these violations. Staff learned of the 222 failed 911 calls in an email received at 4:31 p.m., on Aug. 12, 2017, from the Washington Military Department.⁹
4. **Whether the Company was cooperative and responsive.**
The company was cooperative and responsive throughout the investigation.
5. **Whether the Company promptly corrected the violations and remedied the impacts.**
The company, through its vendor, corrected the circumstances which caused this particular outage in less than three hours. However, staff is not aware of any permanent infrastructure or process improvements by CenturyLink or its vendor to prevent future system failures and outages.
6. **The number of violations and number of customers affected.**
Every Washington resident west of the Cascade Range needing emergency services was potentially affected by this outage. One hundred forty-eight individual customers did need emergency services and made 222 attempts to reach 911. Each and every call was critical, whether the customer made one or multiple attempts to get assistance through a call to 911.
7. **The likelihood of recurrence.**
Unfortunately, this incident was just the latest in a pattern of CenturyLink system failures. Like the 2014 and 2016 incidents, this outage involved a failure at a central switch, with no redundant system in place to prevent an interruption of service. Staff believes that unless CenturyLink makes significant changes, such as better quality control and system redundancy at central switches, another failure is likely.
8. **The Company's past performance regarding compliance, violations, and penalties.**
The commission assessed significant penalties against CenturyLink for violations related to 911 outages that occurred in 2013, 2014, and 2016. An outage from December 2018 is currently under investigation. Staff finds this ongoing pattern of outages to be unacceptable.
9. **The Company's existing compliance program.**
Other than the Washington State and San Juan County Communications Plans, which address notification, staff is not aware of any other compliance program.
10. **The size of the Company.**
CenturyLink is the major ILEC offering telephony, data, and other telecommunications services in the state of Washington, with gross intra-state combined annual revenue of \$399,409,239 in 2017.

⁹ See Appendix B for a copy of Washington Military Department's email, dated July 12, 2017.

Penalty Recommendation

Staff recommends the commission issue a formal complaint against CenturyLink and assess a penalty of up to \$222,000 for 222 violations of RCW 80.36.080, Rates services, and facilities, and of WAC 480-120-450(1) Enhanced 911 obligations of local exchange companies, based on 222 failed calls to 911.

Appendix A

**CTL Responses to Data Requests
Date: September 14, 2017**

Regarding the July 12, 2017 911 outage, please provide:

CP3. Please provide all communication with Washington's Primary Public Safety Answering Points (PSAPs) who were impacted by this outage.

Please see CP-3 Exhibit, attached, which contains a log of phone calls and emails to the PSAPs.

Respondent: Phil Grate

EXHIBIT CP-3

The following 28 PSAPs were notified 7/12/17 around 15:50 PDT. See attached email notification. Note, since the PSAPs weren't notified until after the outage was restored only one notification was done that served as the Initial, Followup (for FCC purposes) and Final notification.

WA-B-CLALLAM COUNTY
WA-BOTHELL PD VERIZON
WA-CLARK REGIONAL COMMUNICATIONS AGENCY/CRESA
WA-COWLITZ COUNTY
WA-GRAYS HARBOR E911
WA-ISLAND COUNTY ICOM
WA-JEFFCOM 9-1-1 Port Hadlock
WA-KING COUNTY SHERIFF RCECC #863
WA-KITSAP COUNTY/CENCOM
WA-KLICKITAT COUNTY
WA-LEWIS COUNTY
WA-MACECOM AKA SHELCOM, AKA MASON COUNTY
WA-NORCOM
WA-PACIFIC COUNTY
WA-REDMOND PD VERIZON
WA-SAN JUAN COUNTY
WA-SEATTLE PD
WA-SKAGIT 911
WA-SKAMANIA COUNTY SHERIFF
WA-SNO-COM VERIZON
WA-SNO-PAC VERIZON
WA-SOUTH SOUND 911
WA-SS911 EASTSIDE DISPATCH
WA-TCOMM 911 formerly CAPCOM THURSTON COUNTY
WA-VALLEY COMM
WA-WA ST PATROL/ PIERCE
WA-WAHKIAKUM COUNTY SHERIFF
WA-WHAT-COMM COMMUNICATIONS - BACKUP

On August 4th WA ST PATROL/ KING COUNTY (WSP-BELLEVUE) was notified (also attached), again with an Initial/Final notification. This PSAP was identified through the information that West provided on missed calls when we were double-checking it against the Incident notification the West provided on the day of the outage.

EXHIBIT CP-3



PSS ID 8375



Initial and Final

Initial and Final ... 911 PSAP Out...

Carolyn Brown
Regulatory Operations Director - Regulatory Compliance
700 W. Mineral Ave.
Littleton, CO 80120
Mailstop: 235106MN00-E19.20
tel: 303-707-7085 cell: 720-313-7741 fax: 402-998-9999
Carolyn.Brown@CenturyLink.com

- Confidential Use Only -
Disclose & distribute only to CenturyLink employees having a need to know.
Disclosure outside of CenturyLink is prohibited without authorization.



CenturyLink™
Stronger Connected™



EXHIBIT CP-3

PSS ID	Notification Status	Notification Type	Notification Method	Device Address	Sent Timestamp	Completed Timestamp	Failed Timestamp	PSAP NAME	CTL Completed Timestamp
7834	Completed	Initial and Final	Verbal	206-794-6304		7/12/2017 6:57:14 PM		WA-BOTHELL PD VERIZON WA-B-CLALLAM COUNTY	
7834	Completed	Initial and Final	Verbal	360-774-6279		7/12/2017 7:00:06 PM		WA-CLARK REGIONAL COMMUNICATIO NS AGENCY/CRESA WA-COWLITZ COUNTY	
7834	Completed	Initial and Final	Verbal	360-992-9222		7/12/2017 7:01:07 PM		WA-GRAYS HARBOR E911 WA-ISLAND COUNTY ICOM WA-JEFFCOM 9-11 1 Port Hadlock WA-KING COUNTY SHERIFF RCECC #863	
7834	Completed	Initial and Final	Verbal	360-431-4712		7/12/2017 7:02:42 PM		WA-KITSAPOO COUNTY/CENCO M	
7834	Completed	Initial and Final	Verbal	360-533-8765		7/12/2017 7:03:47 PM		WA-LEWIS COUNTY	
7834	Completed	Initial and Final	Verbal	360-679-9567		7/12/2017 7:05:09 PM		WA-MACECOM AKA SHELCOM, AKA MASON COUNTY	
7834	Completed	Initial and Final	Verbal	360-774-6279		7/12/2017 7:06:04 PM		WA-NORCOM WA-PACIFIC COUNTY WA-SOUTH SOUND 911 WA-REDMOND PD VERIZON	
7834	Completed	Initial and Final	Verbal	206-205-7621		7/12/2017 7:07:52 PM			
7834	Completed	Initial and Final	Verbal	509-773-0579		7/12/2017 7:08:45 PM			
7834	Completed	Initial and Final	Verbal	360-307-5910		7/12/2017 7:10:36 PM			
7834	Completed	Initial and Final	Verbal	360-740-3394		7/12/2017 7:11:55 PM			
7834	Completed	Initial and Final	Verbal	360-426-4441		7/12/2017 7:12:50 PM			
7834	Completed	Initial and Final	Verbal	425-577-5580		7/13/2017 7:13:37 PM			
7834	Completed	Initial and Final	Verbal	360-875-9397		7/13/2017 5:44:47 AM			
7834	Completed	Initial and Final	Verbal	253-798-7011		7/13/2017 5:45:01 AM			
7834	Completed	Initial and Final	Verbal	425-556-2652		7/13/2017 5:45:15 AM			

EXHIBIT CP-3

PSS_ID	Notification Status	Notification Type	Notification Method	Device Address	Sent Timestamp	Completed Timestamp	Failed Timestamp	PSAP_NAME	CTL Completed Timestamp
7834	Completed	Initial and Final	Verbal	360-428-3211		7/13/2017 5:45:30 AM		WA-SKAGIT 911 WA-SKAMANIA COUNTY	
7834	Completed	Initial and Final	Verbal	509-427-9490		7/13/2017 5:45:43 AM		WA-SAN JUAN SHERIFF	
7834	Completed	Initial and Final	Verbal	360-378-4151		7/13/2017 5:48:56 AM		WA-SAN JUAN COUNTY	
7834	Completed	Initial and Final	Verbal	425-775-4545		7/13/2017 5:46:15 AM		WA-SNO-COM	
7834	Completed	Initial and Final	Verbal	425-407-3930		7/13/2017 5:46:26 AM		VERIZON	
7834	Completed	Initial and Final	Verbal	206-684-8631		7/13/2017 5:46:38 AM		WA-SEATTLE PD WA-TCOMM 911 formerly CAPCOM THURSTON COUNTY	
7834	Completed	Initial and Final	Verbal	360-790-8657		7/13/2017 5:46:50 AM		WA-VALLEY COMM	
7834	Completed	Initial and Final	Verbal	253-372-1490		7/13/2017 5:47:35 AM		WA-WAHKIAKUM COUNTY	
7834	Completed	Initial and Final	Verbal	360-795-3242		7/13/2017 5:47:48 AM		WA-WHAT-SHERIFF	
7834	Completed	Initial and Final	Verbal	360-676-6911		7/13/2017 5:48:01 AM		WA-WHAT-COMM	
7834	Completed	Initial and Final	Verbal	253-798-7011		7/13/2017 5:48:13 AM		COMMUNICATIO NS - BACKUP	
7834	Completed	Initial and Final	Verbal	253-538-3150		7/13/2017 5:48:32 AM		WA-SS911 EASTSIDE DISPATCH	
7834	Failed	Initial and Final	Email	911@sanjuanco.com telcooutagenotifications@snoc om.org	7/13/2017 5:49:24 AM	7/13/2017 5:49:34 AM	7/13/2017 5:51:03 AM	WA-SAN JUAN COUNTY	7/13/2017 5:46:11 AM
7834	Completed	Initial and Final	Email	countydispatcher@cob.org	7/13/2017 5:48:24 AM	7/13/2017 5:48:53 AM		WA-SNO-COM VERIZON WA-WHAT-COMM	7/13/2017 5:49:34 AM
7834	Completed	Initial and Final	Email	countydispatcher@cob.org	7/13/2017 5:48:24 AM	7/13/2017 5:48:53 AM		COMMUNICATIO NS - BACKUP	7/13/2017 5:48:53 AM

EXHIBIT CP-3

PSS ID	Notification Status	Notification Type	Notification Method	Device Address	Sent Timestamp	Completed Timestamp	Failed Timestamp	PSAP NAME	CTL Completed Timestamp
7834	Completed	Initial and Final	Email	CommSupsb@southsound911.org	7/13/2017 5:48:24 AM	7/13/2017 5:48:53 AM		WA-SS911 EASTSIDE DISPATCH	7/13/2017 5:48:53 AM
7834	Completed	Initial and Final	Email	d1communications@wsp.wa.gov	7/13/2017 5:48:24 AM	7/13/2017 5:48:53 AM		WA-WA ST PATROL/ PIERCE	7/13/2017 5:48:53 AM
7834	Completed	Initial and Final	Email	wcs0911@co.wahkiakum.wa.us	7/13/2017 5:47:54 AM	7/13/2017 5:48:05 AM		WA-WAHKIAKUM COUNTY SHERIFF	7/13/2017 5:48:05 AM
7834	Completed	Initial and Final	Email	supervisors@valley.com.org	7/13/2017 5:47:24 AM	7/13/2017 5:47:46 AM		WA-VALLEY COMM	7/13/2017 5:47:46 AM
7834	Completed	Initial and Final	Email	russ.stryers@seattle.gov	7/13/2017 5:46:54 AM	7/13/2017 5:47:23 AM		WA-SEATTLE PD	7/13/2017 5:47:23 AM
7834	Completed	Initial and Final	Email	lit@lcomm911.org	7/13/2017 5:46:54 AM	7/13/2017 5:47:23 AM		WA-TCCOMM 911 formerly CAPCOM THURSTON COUNTY	7/13/2017 5:47:23 AM
7834	Completed	Initial and Final	Email	telcooutagenotifications@snopac911.us	7/13/2017 5:46:24 AM	7/13/2017 5:46:33 AM		WA-SNO-PAC VERIZON	7/13/2017 5:46:33 AM
7834	Completed	Initial and Final	Email	jasont@co.skamania.wa.us	7/13/2017 5:45:54 AM	7/13/2017 5:46:11 AM		WA-SKAMANIA COUNTY SHERIFF	7/13/2017 5:46:11 AM
7834	Completed	Initial and Final	Email	CommSupsb@southsound911.org	7/13/2017 5:45:24 AM	7/13/2017 5:45:52 AM		WA-SOUTH SOUND 911	7/13/2017 5:45:52 AM
7834	Completed	Initial and Final	Email	911supervisor@redmond.gov	7/13/2017 5:45:24 AM	7/13/2017 5:45:52 AM		WA-REDMOND PD VERIZON	7/13/2017 5:45:52 AM
7834	Completed	Initial and Final	Email	ecleadership@co.skagit.wa.us	7/12/2017 7:13:54 PM	7/12/2017 7:14:22 PM		WA-SKAGIT 911	7/12/2017 7:14:22 PM
7834	Completed	Initial and Final	Email	pe911@co.pacific.wa.us	7/12/2017 7:13:24 PM	7/12/2017 7:13:59 PM		WA-PACIFIC COUNTY	7/12/2017 7:13:59 PM
7834	Completed	Initial and Final	Email	ea911outage@norcom.org	7/12/2017 7:12:24 PM	7/12/2017 7:12:41 PM		WA-NORCOM AKA WAGCECOM AKA SHELCOM, AKA MASON COUNTY	7/12/2017 7:12:41 PM
7834	Completed	Initial and Final	Email	theteam@macecom.org	7/12/2017 7:10:54 PM	7/12/2017 7:11:20 PM		WA-LEWIS COUNTY	7/12/2017 7:11:20 PM
7834	Completed	Initial and Final	Email	dave.anderson@lewiscountywa.gov	7/12/2017 7:10:24 PM	7/12/2017 7:10:57 PM		WA-KITSAP COUNTY/CENCO M	7/12/2017 7:10:57 PM

EXHIBIT CP-3

PSS_ID	Notification Status	Notification Type	Notification Method	Device Address	Sent Timestamp	Completed Timestamp	Failed Timestamp	PS/AP_NAME	CTL Completed Timestamp
7834	Completed	Initial and Final	Email	janiew@kickitatcounty.org	7/12/2017 7:08:24 PM	7/12/2017 7:08:31 PM		WA-KICKITAT COUNTY	7/12/2017 7:08:31 PM
7834	Completed	Initial and Final	Email	KCE911EMER@KINGCOUNTY.GOV	7/12/2017 7:07:24 PM	7/12/2017 7:07:38 PM		WA-KING COUNTY SHERIFF RCECC #863	7/12/2017 7:07:38 PM
7834	Completed	Initial and Final	Email	ihelpdesk@icpsn.us	7/12/2017 7:05:24 PM	7/12/2017 7:05:41 PM		WA-JEFFCOM 9-11 Port Hadlock	7/12/2017 7:05:41 PM
7834	Completed	Initial and Final	Email	lisa@icom911.org	7/12/2017 7:04:54 PM	7/12/2017 7:05:20 PM		WA-ISLAND COUNTY ICOM	7/12/2017 7:05:20 PM
7834	Completed	Initial and Final	Email	dispatch@gh911.org	7/12/2017 7:03:24 PM	7/12/2017 7:03:42 PM		WA-GRAYS HARBOR E911	7/12/2017 7:03:42 PM
7834	Completed	Initial and Final	Email	wellsd@co.cowlitz.wa.us	7/12/2017 7:01:54 PM	7/12/2017 7:02:18 PM		WA-COWLITZ COUNTY	7/12/2017 7:02:18 PM
7834	Completed	Initial and Final	Email	helpdesk.cresa@clark.wa.gov	7/12/2017 7:00:54 PM	7/12/2017 7:01:00 PM		WA-CLARK REGIONAL COMMUNICATIONS AGENCY/CRESA	7/12/2017 7:01:00 PM
7834	Completed	Initial and Final	Email	percomsup@co.clallam.wa.us	7/12/2017 6:57:54 PM	7/12/2017 6:58:18 PM		WA-B-CLALLAM COUNTY	7/12/2017 6:58:18 PM
7834	Completed	Initial and Final	Email	micki.singer@bothellwa.gov	7/12/2017 6:56:54 PM	7/12/2017 6:57:25 PM		WA-BOTHELL PD VERIZON	7/12/2017 6:57:25 PM
					all timestamps are EDT				
Aug 31, 2017 6:12 PM									

EXHIBIT CP-3

Page 1 of 2

From: 911 Outage Report
Sent: Wednesday, July 12, 2017 5:18 PM
To: 911 OUTAGE DUTY LIST
Subject: FW: Initial and Final 911 PSAP Outage Notification

From: Cave, William
Sent: Wednesday, July 12, 2017 6:18:01 PM (UTC-06:00) Central Time (US& Canada)
To: 911 Outage Report; 911 OUTAGE DUTY LIST
Subject: RE: Initial and Final 911 PSAP Outage Notification

The NTM dev team has been notified of the multiple resends to investigate

Will Cave
Supervisor, GROC Public Safety Services
Office: 402-536-7448; Mobile: 612-791-8134
William.Cave@CenturyLink.com

From: 911 Outage Report
Sent: Wednesday, July 12, 2017 6:12 PM
To: 911 OUTAGE DUTY LIST
Subject: FW: Initial and Final 911 PSAP Outage Notification

From: SNO PAC Helpdesk
Sent: Wednesday, July 12, 2017 6:11:50 PM (UTC-06:00) Central Time (US& Canada)
To: 911 Outage Report
Subject: RE: Initial and Final 911 PSAP Outage Notification

We keep getting this email over and over. Please stop.

--
Steve Lawlor | SNO PAC 911 | O: 425.407.3924 | slawlor@snopac911.us | Help Desk: 425.407.3939

From: CenturyLink [<mailto:911.Outage.Report@centurylink.com>]
Sent: Wednesday, July 12, 2017 4:10 PM
To: *SNOPAC Notify Telco Outage <TelcoOutageNotifications@snopac911.us>
Subject: Initial and Final 911 PSAP Outage Notification



CenturyLink

Initial and Final 911 PSAP Outage Notification

You are receiving this email because you are a designated contact person for outage communications for this facility. There was a network event that may have caused a potential 911 PSAP/Central Office/ALI Outage in your area that has restored prior to this notification. CenturyLink is attempting/or has contacted your PSAP via telephone to inform you of this possible 911 outage. CenturyLink is sending this email notification pursuant to Section 4.9(h) of the Rules of the Federal Communications Commission, 47 C.F.R. § 4.9(h).

BELOW IS THE BEST-AVAILABLE INFORMATION KNOWN ABOUT THIS EVENT AT THIS TIME. THIS INFORMATION MAY CHANGE AS CENTURYLINK CONTINUES ITS INVESTIGATION.

UT-190209

Appendices Page 21

file:///C:/Users/mmeters/AppData/Local/Microsoft/Windows/Temporary%20Internet%20Fi... 9/13/2017

EXHIBIT CP-3

Page 2 of 2

Cause of 911 Impact	Software configuration
Geographic Scope of Outage	Multiple Washington State PSAP's
Time of Repair	7/12/2017 11:28:00 AM
Action Taken to Minimize 911 Impact	Your PSAP may have been impacted by an outage earlier today that has been resolved. CenturyLink is currently investigating the event.

You may contact CenturyLink by calling the number below and referencing Ticket Number

Ticket Id	Ticket Number
PSS Id	7834
WFA Ticket	MW095369

or by replying to this email to get further action taken regarding the outage and to discuss any steps to help mitigate the 911 impact.

CenturyLink 911 Public Safety Services
200 S 5th St
Minneapolis MN 55402
Tel: 800-357-0911, Opt 1

Email: 911.Outage.Report@centurylink.com

*** For 911 Reroute Requests Call 800-357-0911, Opt 1 ***

CONFIDENTIALITY NOTICE: If you are not a designated contact person for outage communications for this facility, you are hereby notified that you are not authorized to read, print, retain, copy, or disseminate this message, any part of it, or any attachments. If you have received this message in error, please delete this message and any attachments from your system without reading the content and notify the sender immediately of the inadvertent transmission. This email may contain confidential or proprietary information and is not to be forwarded outside your organization without the express written consent of CenturyLink.

EXHIBIT CP-3

Page 1 of 2

From: 911 Outage Report
Sent: Friday, August 04, 2017 12:00 PM
To: 911 OUTAGE DUTY LIST
Subject: FW: Initial and Final 911 PSAP Outage Notification

From: 911 Outage Report
Sent: Friday, August 04, 2017 1:00:01 PM (UTC-06:00) Central Time (US& Canada)
To: 911 Outage Report
Subject: Initial and Final 911 PSAP Outage Notification



CenturyLink

Initial and Final 911 PSAP Outage Notification

You are receiving this email because you are a designated contact person for outage communications for this facility. There was a network event that may have caused a potential 911 PSAP/Central Office/ALI Outage in your area that has restored prior to this notification. CenturyLink is attempting/or has contacted your PSAP via telephone to inform you of this possible 911 outage. CenturyLink is sending this email notification pursuant to Section 4.9(h) of the Rules of the Federal Communications Commission, 47 C.F.R. § 4.9(h).

BELOW IS THE BEST-AVAILABLE INFORMATION KNOWN ABOUT THIS EVENT AT THIS TIME. THIS INFORMATION MAY CHANGE AS CENTURYLINK CONTINUES ITS INVESTIGATION.

Cause of 911 Impact	Configuration error during a router upgrade caused 13 callers to reach a busy signal between 07:52 CDT to 10:00 CDT
Geographic Scope of Outage	Wireless callers served by King County
Time of Repair	7/12/2017 10:00:00 AM
Action Taken to Minimize 911 Impact	Corrected configuration

You may contact CenturyLink by calling the number below and referencing Ticket Number

Ticket Id	Ticket Number
PSS Id	8375
WFA Ticket	MW095361

or by replying to this email to get further action taken regarding the outage and to discuss any steps to help mitigate the 911 impact.

CenturyLink 911 Public Safety Services
200 S 5th St
Minneapolis MN 55402
Tel: 800-357-0911 Opt 1

Email: 911_Outage_Report@centurylink.com

*** For 911 Reroute Requests Call 800-357-0911 Opt 1 ***

CONFIDENTIALITY NOTICE: If you are not a designated contact person for outage communications for this facility, you are hereby notified that you are not authorized to read, print, retain, copy, or disseminate this message, any part of it, or any attachments. If you have received this message in error, please delete this message and any attachments from your system without reading the content and notify the sender immediately of the inadvertent transmission. This email may contain confidential or proprietary information and is not to be forwarded outside your organization without the express written consent of CenturyLink.

UT-190209

Appendices Page 23

EXHIBIT CP-3

Page 2 of 2

Appendix B

From: [Leneweaver, William A \(MIL\)](#)
To: [911 Outage Notification \(Benton\)](#); [911 Outage Notification \(Clallam\)](#); [911 Outage Notification \(Clallam2\)](#); [911 Outage Notification \(Clark\)](#); [911 Outage Notification \(Columbia\)](#); [911 Outage Notification \(Ferry\)](#); [911 Outage Notification \(Grant\)](#); [911 Outage Notification \(Grays Harbor\)](#); [911 Outage Notification \(Jefferson\)](#); [911 Outage Notification \(King\)](#); [911 Outage Notification \(Kitsap\)](#); [911 Outage Notification \(Kittitas\)](#); [911 Outage Notification \(Lincoln\)](#); [911 Outage Notification \(Mason\)](#); [911 Outage Notification \(Okanogan\)](#); [911 Outage Notification \(Pend Oreille\)](#); [911 Outage Notification \(San Juan\)](#); [911 Outage Notification \(Skagit\)](#); [911 Outage Notification \(SNOCOM\)](#); [911 Outage Notification \(SNOPAC\)](#); [911 Outage Notification \(Wahkiakum\)](#); [911 Outage Notification \(Whitcom\)](#); [911 Outage Notification \(WSP\)](#); [JoAnn Boags \(Pend Oreille\)](#); [West Steve](#); [911 Outage Notification \(Pierce\)](#); [Kellie Pybas \(Pierce\)](#); [Tim Hannah \(SS911\)](#); [Link Tim](#); [Jeff Rodeman \(JBLM\)](#); [Mike Schumacher \(FAFB\)](#); [McCormick Amy](#); [Anderson Heather](#); [Fode Angie](#); [Barb Phinney \(Columbia\)](#); [Brad Coughenour \(Yakima County\)](#); [Cantu Brenda](#); [Grupp Criselia](#); [Mainwaring Darlene](#); [Anderson David](#); [Halloran Dave](#); [Wells Deanna](#); [Deb Flewelling \(King\)](#); [Doug deGraaf \(Benton\)](#); [Fuller, Dave \(CRESA\)](#); [Erickson Greg](#); [Rasmussen Helen](#); [Jones Jackie](#); [Fosse James](#); [Ward Jamie](#); [Fritts Jason](#); [Jo Borden \(Lincoln County\)](#); [Kuhlmeyer Joannie](#); [Hall Karin](#); [Hatton Karl](#); [Slaybaugh Kathleen](#); [Kathy Lombardo \(King\)](#); [Katy Myers \(Clark County\)](#); [Flewelling Keith](#); [Kim Lettrick \(Benton\)](#); [Kim Ott \(San Juan County\)](#); [Kris DeVore \(CRESA\)](#); [Laura Pitarys \(King County\)](#); [LaVonne Webb - \(Stevens\)](#); [Caldwell Lisa](#); [Lorlee Mizell \(Spokane County\)](#); [Janowski Mark](#); [Davis Marlys](#); [Mary Ransier \(Mason\)](#); [Evans Mike](#); [Mike Voss \(Skagit County\)](#); [Worden Mike](#); [Kelly Patti](#); [Richard Kirton \(Kitsap\)](#); [Rick A. Rochleau \(Franklin\)](#); [Rick Anderson \(Stevens\)](#); [Robin DeLazerda \(San Juan\)](#); [Scott Lilly \(Colville Tribes\)](#); [Romberg Steve](#); [Ruley Steven](#); [Tim Martindale \(Pacific County\)](#); [Shaughnessy Tom](#); [Barnes Vanessa](#); [Vicki Thoroughman \(Snohomish\)](#); [Wendy Hill \(Thurston County\)](#)
Cc: [MIL DL E911 Outages](#); [Beaton, Rebecca \(UTC\)](#); [Roth, Jing \(UTC\)](#); [Vicki Hyett \(CenturyLink\)](#)
Subject: Outage Notifications From CenturyLink
Date: Wednesday, July 12, 2017 4:31:59 PM

Friends, I apologize for the late notification/acknowledgement of this... Many of you have been receiving outage notifications from CenturyLink this afternoon...

I have found out that there was some form of service disruption earlier today in the West ECMC in Englewood, CO that resulted in possibly as many as 222 calls not being delivered due to an error code.

The notifications you are now receiving are from CenturyLink in order to comply with FCC Regulations and they are being generated for each end office that originated calls that potentially failed to process. They are trying to cover the bases to ensure you are aware – defaulting to more notifications then is likely necessary.

As they discover the true scope of the problem and the true number of impacted calls the exact number will likely go down. CenturyLink is aware of your desire to receive a list of the calls that failed to be delivered to your PSAPs and will distribute the call list as soon as it's available.

Andy

William Andrew Leneweaver
Deputy State E911 Coordinator for Enterprise Systems
Washington State E911 Coordination Office
20 Aviation Drive, Camp Murray, WA 98430-5020
Desk: 253-512-7039 | Mobile: 253-302-9214
Email: andy.leneweaver@mil.wa.gov
911 Technical Assistance: e911technicalservices@mil.wa.gov
911 Outages: e911outages@mil.wa.gov | State Alert & Warning Center: [800-258-5990](tel:800-258-5990)



Appendix C

From: [Grate, Phil](#)
To: [Beaton, Rebecca \(UTC\)](#)
Subject: courtesy notification of non-major outage
Date: Friday, July 14, 2017 9:59:09 AM

Rebecca,

This is a courtesy notification of a non-major outage event.

West (formerly Intrado) did a system upgrade / reboot on Wednesday morning that caused potential issues with more than 200 911 calls in the state of Washington.

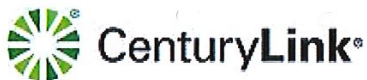
There are some network rerouting configurations that may reduce the number of affected calls. We are researching the matter.

We notified the PSAPs after the fact and opened an FCC outage report. Once we have all of the final stats, we will update the report.

Regards,

Phil

Phil Grate
Director, Regulatory Affairs
1600 7th Avenue, Seattle, WA 98191
Office 206-345-6224 Wireless 425-301-8411



This communication is the property of CenturyLink and may contain confidential or privileged information. Unauthorized use of this communication is strictly prohibited and may be unlawful. If you have received this communication in error, please immediately notify the sender by reply e-mail and destroy all copies of the communication and any attachments.

Appendix D



STATE OF WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION
1300 S. Evergreen Park Dr. S.W., P.O. Box 47250 • Olympia, Washington 98504-7250
(360) 664-1160 • TTY (360) 586-8203

August 25, 2017

Philip E. Grate
CenturyLink
1600 7th Ave., Room 1506
Seattle, WA 98191

RE: Data Request

Dear Mr. Grate:

The Utilities and Transportation Commission is conducting an investigation into the July 12, 2017, emergency 911 outage that resulted in failed calls in the state of Washington.

To complete this investigation, commission staff requests the following information from CenturyLink related to the outages:

- CP1. The number of affected customers, identified by customer type (commercial or residential), and CenturyLink services affected.
- CP2. Please provide a list of every failed 911 call, including the full telephone number.
- CP3. Please provide all communication with Washington's Primary Public Safety Answering Points (PSAPs) who were impacted by this outage.
- CP4. Please provide documentation of all call backs related to failed calls.
- CP5. A chronology of all internal communications related to the outages, including summaries of phone calls, and copies of any emails or other written correspondence.
- CP6. A chronology of all communications with stakeholders related to the outages (such as commission staff, other federal, state, county, and local governments, the media, and the public). Include summaries of phone calls and copies of any emails or other written correspondence.
- CP7. A chronology of service restoral by location, number of customers, and service type.

Respect. Professionalism. Integrity. Accountability.

CenturyLink
Aug. 25, 2017
Page 2

CP8. Please provide a summary of any credits for the outages that were/will be provided.

Please provide the name, title, telephone number, and email address of the contact person that our staff can work with directly for questions that may arise concerning any details of the data.

You are required to furnish the above requested documents no later than 5 p.m., Sept. 12, 2017. Extension requests may be granted on a case-by-case basis. A request for extension must be made in writing prior to the deadline and must include the reasons for the extension. Please attach a copy of this letter to the documents for reference.

If you have any questions regarding this request or the level of detail requested, please contact Kristi Ferguson, Compliance Investigator at (360) 664-1108 or kferguso@utc.wa.gov.

Sincerely,



Steven V. King
Executive Director and Secretary

Appendix E

CTL Responses to Data Requests
Date: September 14, 2017

Regarding the July 12, 2017 911 outage, please provide:

- CP1. The number of affected customers, identified by customer type (commercial or residential), and CenturyLink services affected.

The service affected was access to 911, which was partially impaired. During this outage 1,405 calls were made to 911 served by the 29 PSAPs. 1,183 of those calls were successful. 201 calls were unsuccessful. Of the 201 unsuccessful calls, 8 were from unique wireline telephone numbers and 193 were from mobile numbers for a total of 201 missed calls. Of the eight unique wireline telephone numbers, it appears as though two (2) are assigned to a residential customer and six (6) are assigned to business customers. However, these are not all CenturyLink customers so CenturyLink cannot be completely certain of this. CenturyLink does not have data regarding whether the wireless numbers are business or residential customers.

Please see Attachment CP1-1 and Confidential Attachment CP 1-2C for additional information about this incident that was previously provided to Ms. Beaton, Regulatory Services Staff, on August 11, 2017. Information in the above portion of this response reflects more accurate data about the outage and updated information will be communicated to Ms. Beaton.

Respondent: Phil Grate

EXHIBIT CP1-1



CENTURYLINK
1600 7th Avenue, Room 1506
Seattle, Washington 98191
(206) 345-6224
(425) 301-8411 (cell)
Email: phil.grate@centurylink.com

Phillip E. Grate
State Regulatory Affairs Director
Public Policy

August 11, 2017

Via Web Portal

Mr. Steven King
Executive Director and Secretary
Washington Utilities and Transportation Commission
1300 S. Evergreen Park Drive
Olympia, Washington 98504
(360) 664-1160

**Re: Docket No. UT-140280
CenturyLink Major Outage 7/12/2017 NORS Report**

Mr. King:

CenturyLink submits in the above referenced docket the following responses to requests for information posed by Rebecca Beaton, WUTC Regulatory Staff, regarding a CenturyLink Major Outage 7/12/2017 NORS Report (WA service interruption - 2CTLVPSAP071217).

Ms. Beaton submitted requests to me for information on Monday, July 17, 2017 at 8:05 a.m. and on Monday, July 24, 2017 at 3:59 p.m. The following matrix sets forth her requests and CenturyLink's response.

Request	Response
Root cause analysis.	Please see the attached <u>confidential</u> root cause analysis (RCA) prepared by our vendor, West.
UTC outage email report. Please file an outage email on this service impact in the <u>telecom-outage@utc.wa.gov</u> with the number of PSAPs affected, locations, customer number, time of outage and resolution in Pacific Time.	CenturyLink emailed the outage report as per your request at 2:20p.m. (PDT) on July 26, 2017.

EXHIBIT CP1-1

Mr. Steven King
Executive Director and Secretary
August 11, 2017
Page 2

Request	Response
Root cause analysis. Please add a cover sheet with the reference details as vendor "West" prepared information.	This letter serves as the requested cover sheet for the requested <u>confidential</u> root cause analysis, which is attached. Our vendor, West, prepared the root cause analysis.
Pacific Time for outage (start and end).	Start: 12-JUL-2017, 05:52:00 End: 12-JUL-2017, 08:39:00
Number of missed 911 calls.	222 calls to 911 were missed.
Customer impact number.	During this outage a 1,405 calls were made to 911 served by the 29 PSAPs. 1,183 of those calls were successful. 222 calls were unsuccessful. Of the 222 unsuccessful calls, 8 were from unique wireline telephone numbers and 140 were from unique mobile callback numbers for a total of 148 wireline and wireless customers impacted.
Number of WA PSAPs impacted.	CenturyLink understands the following PSAPs were potentially affected by the July 12, 2017 event, with those that experienced missed 911 calls marked with an asterisk: Bothell Police Department; *Pencom-Clallam County; *Clark Regional Emergency Services Agency; *Cowlitz County 9-1-1 Center; Grays Harbor Communications; Island County Emergency Services Communications Center; *JEFFCOM 9-1-1 Communications; *King County – Sheriff; *Kitsap County; *Klickitat County Sheriff's Office; *Lewis County 9-1-1 Communications Division; MASON County (Shelton Police Department Macecom); *NORCOM-King County (Bellevue Police Department Communications); Pacific County Communications; Puyallup Communications; Redmond Police Department; *Seattle Police Department; *Skagit County; *Skamania County Sheriff's Office; San Juan County Sheriff's Office; *SNOCOM - Snohomish County; SNOPAC - Snohomish County; *South Sound 911; *Thurston County-CAPCOM; *Valley Communications Center; *Washington State Patrol – King County; *Washington State Patrol-Tacoma; Wahkiakum County Sheriff's Office; and *What-Comm Communications Center.

EXHIBIT CP1-1

Mr. Steven King
Executive Director and Secretary
August 11, 2017
Page 3

Request	Response
Contact name and number for report	Phil Grate, 425-301-8411

Questions regarding this response can be directed to me.

Sincerely,



Philip E. Grate

PEG/jga

Enclosure

Regarding the July 12, 2017 911 outage, please provide:

CP1. The number of affected customers, identified by customer type (commercial or residential), and CenturyLink services affected.

Amended response October 9 , 2017:

The service affected was access to 911, which was partially impaired. During this outage 1,405 calls were made to 911 served by the 29 PSAPs. 1,183 of those calls were successful. 222 calls were unsuccessful. Of the 222 unsuccessful calls, 8 were from unique wireline telephone numbers and 193 were from mobile numbers for a total of 201 unique telephone numbers. Of the eight unique wireline telephone numbers, it appears as though two (2) are assigned to a residential customer and six (6) are assigned to business customers. However, these are not all CenturyLink customers so CenturyLink cannot be completely certain of this. CenturyLink does not have data regarding whether the wireless numbers are business or residential customers.

The service affected was access to 911, which was partially impaired. During this outage 1,405 calls were made to 911 served by the 29 PSAPs. 1,183 of those calls were successful. 201 calls were unsuccessful. Of the 201 unsuccessful calls, 8 were from unique wireline telephone numbers and 193 were from mobile numbers for a total of 201 missed calls. Of the eight unique wireline telephone numbers, it appears as though two (2) are assigned to a residential customer and six (6) are assigned to business customers. However, these are not all CenturyLink customers so CenturyLink cannot be completely certain of this. CenturyLink does not have data regarding whether the wireless numbers are business or residential customers.

Please see Attachment CP1-1 and Confidential Attachment CP 1-2C for additional information about this incident that was previously provided to Ms. Beaton, Regulatory Services Staff, on August 11, 2017. Information in the above portion of this response reflects more accurate data about the outage and updated information will be communicated to Ms. Beaton.

Respondent: Phil Grate

Regarding the July 12, 2017 911 outage, please provide:

CP2. Please provide a list of every failed 911 call, including the full telephone number.

Amended Response October 9, 2017:

CenturyLink received the attachment to CP-2 from West and we have reached out to determine the time zone reflected on this document. CenturyLink will follow up on this response by Thursday, October 12, 2017.

Response: See Confidential Exhibit CP-2. This spreadsheet, provided by West, contains lists of both the wireline and wireless calls identified in CP-1.

On the wireless calls we can only provide the P/ANI that was provided by the wireless provider and not the actual calling number. The calling number is not provided until the call is routed to the PSAP and an ALI bid is made to get the information regarding the call. Since the calls never completed the ALI bid was never completed. The wireless carriers may have this information for their customers, but CenturyLink does not.

Respondent: Phil Grate

Regarding the July 12, 2017 911 outage, please provide:

CP5. A chronology of all internal communications related to the outages, including summaries of phone calls, and copies of any emails or other written correspondence.

Amended Response October 9, 2017:

Please see Confidential Exhibit CP-5, which includes the emails associated with the July 12, 2017 911 outage. CenturyLink does not maintain records of phone calls or call logs.

Response: Please see CP-5 exhibit, attached.

Respondent: Phil Grate