BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,

Complainant,

v.

CENTURYLINK COMMUNICATIONS, LLC,

Respondent.

EXHIBIT TO
TESTIMONY OF

MARTIN D. VALENCE

ON BEHALF OF
CENTURYLINK COMMUNICATIONS, LLC

COMTECH RESPONSE TO PUBLIC COUNSEL DATA REQUEST 5

March 31, 2022

Redacted Information is CONFIDENTIAL per Protective Order in Docket No. UT-181051
PC5. The service that failed was a commercial long haul TDM facility. Normally, 9-1-1 circuits are treated specially in order to assure high availability. Please explain why commercial circuits were deemed acceptable for a 9-1-1 service.

RESPONSE:
TSYS believes Public Counsel is referring to Telephone Services Priority (“TSP”) classifications, which “provide national security and public safety organizations with a way to receive priority installation and repair of critical data and voice communications circuits.” TSP classifications are considered most necessary when there is a single path to a location for critical services, such as the delivery of 911 calls to PSAPs.

TSYS’s estimation is that the reason a failing/errring CenturyLink IP router affected [redacted] is that CenturyLink was using pseudowire technology to convert TSYS’s long haul TDM circuits to IP (without TSYS’s knowledge or consent) and CenturyLink failed to ensure that these IP routes used independent paths. Such use of pseudowire would be invisible to TSYS. Based on the CenturyLink outage report issued by the Federal Communication Commission’s Public Safety and Homeland Security Bureau, it is possible that other 911 vendors’

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4 In telecommunications, pseudowire (or pseudo-wire) technology “is an emulation of a native service over a packet switched network (PSN).” See Bugenhagen; Michael K., CenturyLink Intellectual Property LLC, System and Method for Advanced Adaptive Pseudowire, U.S. Patent No. 8,761,207 (issued Nov. 4, 2010), https://patents.justia.com/patent/8761207. The service being converted and carried (aka emulated) may be Asynchronous Transfer Mode (“ATM”), Frame Relay, Ethernet or time-division multiplexing (“TDM”) while the packet network may be Multi-protocol Label Switching (“MPLS”), Internet Protocol (IPv4 or IPv6), or Layer 2 Tunneling Protocol Version 3 (“L2TPv3”).
circuits that might have sought TSP 1 designations for their CenturyLink circuits did not have their impairments resolved by CenturyLink any faster than TSYS’s circuit impairments.\(^5\)

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

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