

**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**

**STEVEN E. TURNER**

**ON BEHALF OF  
CENTURYLINK COMMUNICATIONS, LLC**

*CLC RESPONSE TO STAFF DATA REQUEST 9*

**March 31, 2022**

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### **UTC STAFF DATA REQUEST NO. 9:**

At the time of the outage, did CenturyLink have a process to validate SS7 link diversity for the affected transport network? If so, please describe and provide a copy of the process.

#### **RESPONSE:**

CLC objects to this data request on the grounds that it is not reasonably calculated to lead to the discovery of admissible evidence. This data request and numerous others in this set seek to investigate an outage on CLC's national transport network. The outage did not directly affect CLC's or its affiliates' remaining 911 network in Washington. Instead, it affected CLC's national transport network. More specifically, the outage affected *interstate DS-3 circuits* purchased by a vendor of Comtech on behalf of Comtech (for the provision of SS7 functionality), the responsible Washington 911 provider for the PSAPs that experienced a 911 outage. The interstate and non-regulated services provided on CLC's national transport network, and the facilities utilized to provide such services, are not regulated by the Commission, and the Commission lacks jurisdiction over them. *In Re AT&T Commc'ns of the Pac. Nw.*, No. 04, 2003 WL 23341214 (Wash. U.T.C. Dec. 1, 2003) ("AT&T's proposed language would encompass facilities-access purchased out of federal tariffs over which the Commission lacks jurisdiction.") (citing 34th Supplemental Order; Order Regarding Qwest's Demonstration of Compliance with Commission Orders, *Investigation Into U S WEST Communications, Inc.'s Compliance With Section 271 of the Telecommunications Act of 1996; U S WEST Communications, Inc.'s Statement of Generally Available Terms Pursuant to Section 252(f) of the Telecommunications Act of 1996*, Dkt. Nos. UT-003022, UT-003040, ¶ 22 (May 2002)); *MilleniaNet Corp. v. Pennsylvania Pub. Util. Comm'n*, No. 990 C.D. 2008, 2009 WL 9104922 (Pa. Commw. Ct. Apr. 30, 2009) (complaint dismissed because the "the PUC does not have jurisdiction over interstate telecommunications services."). Without waiving its objections, CLC responds as follows.

This data request appears to be premised on a misunderstanding of the facts underlying the outage at issue in this proceeding. Staff seems to assume that there was an SS7 failure on the CLC national transport network. This is untrue.

At the time of the outage, the State of Washington was in the process of transitioning responsibility for 911 calling to Comtech Telecommunications Corp. ("Comtech"). At the time of the outage, Comtech was responsible for routing calls to 47 of Washington's Public Safety Answer Points (PSAPs), and CenturyLink retained responsibility to route calls to Washington's 15 remaining PSAPs. During the December 2018 event, 911 calls to the CenturyLink PSAPs completed, but some calls to the Comtech PSAPs did not. Comtech utilized Transaction Network Systems ("TNS") to provide Comtech SS7 services in support of Comtech's 911 services in Washington. TNS submitted orders to CLC for dedicated facilities to use as SS7 links, but did not inform CenturyLink that

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these circuits would be used to provide SS7 service and/or to support 911 services. Prior to the outage, CLC was unaware that TNS was using circuits on CLC's national transport network to provide SS7 functionality at all, let alone in support of Comtech's 911 services in Washington. Moreover, providers of 911 services—in this instance Comtech—are responsible to design their networks to ensure they are sufficiently reliable and robust, and where feasible provide service via diverse SS7 links and audit their networks to ensure SS7 link diversity.

At the time of the December 2018 network event, CenturyLink's 911 network in Washington did not transit the Infinera network that was affected by the transport outage.

**Respondent: CenturyLink Legal**  
**Martin Valence, Vice President Network Operations Center**