

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**

WMD RESPONSE TO PUBLIC COUNSEL DATA REQUEST 4

March 31, 2022

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

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

Public Counsel Data Request No. 4-7C to Washington Military Department (WMD)

SUPPLEMENTAL RESPONSES TO PUBLIC COUNSEL DATA REQUEST NO. 4-7C

SUPPLEMENTAL RESPONSE:

The Washington Military Department has determined that the highlighted confidential information contained in the original responses below are not confidential and do not need to be protected and is lifting the confidential highlighting.

Date Prepared: December 8, 2021

Prepared by: Dawn Cortez

Witness: William Andrew Leneweaver and Kenneth Moisey

Phone No: 360.586.2436

PC-4 In CenturyLink's Response to Public Counsel Data Request No. 7, CenturyLink provided a diagram, numbered CLC-001454 and attached hereto for the sake of convenience, that identified a Demarcation Point. Does the Washington Military Department (WMD) agree with the CenturyLink diagram's location of the point of demarcation? If not, where on the diagram does WMD understand the point of demarcation to be?

RESPONSE:

There was no discussion, which WMD was privy to, that identified any particular demarcation point.

WMD believes the location shown was selected because it appears to be (based on the arrow head shown in the diagram) the logical end point of the part of the interconnection for which CenturyLink contracted with MIL under Contract E09-196, and was responsible for providing.

However, because it is our understanding that CenturyLink, either directly or through a reseller, was the actual underlying provider of all, or at least portions, of the interconnections, the demarcation point of the actual circuits is likely #8, the Comtech RCL (LNG), as shown on the CenturyLink provided diagram, numbered CLC-001454.

Additionally, on the CenturyLink provided diagram, numbered CLC-001454, "#2. Lumen 911 Selective Router" is shown. Over the course of the contract, and at what was referred to as the "End Office Migration," CenturyLink asserted to WMD that Selective Routers in Washington State were no longer in use as of October 2014. Because of this, 911 calls

Shaded Information is Confidential per Protective Order in Docket UT-181051

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originating in “#1. OSP, ILEC, CLEC, VOIP Wireless” were routed to “#3. Intrado RCL (LNG).”

Date Prepared: 11/22/2021
Prepared by: Dawn Cortez and William Leneweaver
Witness: William Leneweaver
Phone No. Represented by Dawn Cortez – 360.586.6470

PC-5C In reference to the contract between the Washington Military Department (WMD) and CenturyLink, Contract No. E09-196, effective June 5, 2009, as amended, please explain with particularity WMD’s understanding of whether the contract relieves CenturyLink of its obligation thereunder to provide covered 9-1-1 services after a call passes the point of demarcation. In your answer, please explain why it is or is not so relieved.

RESPONSE:

As stated in the Washington Military Department (WMD) and CenturyLink, Contract No. E09-196, effective June 5, 2009, as amended, in section 11. AMENDMENT TERMS AND CONDITIONS, paragraph 1:

During the PSAP Migration, Contractor remains responsible for routing calls to PSAPs that have not migrated to ESInet II (“Unmigrated PSAPs”), and for routing calls intended for Migrated PSAPs to the Demarcation Point at ESInet II, at which point the successor provider assumes responsibility for delivering such calls to Migrated PSAPs and is therefore the Covered 911 Service Provider.

WMD believes that this language relieves CenturyLink of its obligation to provide covered 9-1-1 services after a call passes the point of demarcation. However, because WMD cannot identify any specific demarcation point in the contract documents and does not recollect discussion of a specific demarcation point, WMD understood the demarcation point to be #8 Comtech RCL (LNG) as shown on the CenturyLink provided diagram, numbered CLC-001454.

In support of this understanding, during discussions with CenturyLink, over the course of Contract No. E09-196, CenturyLink and their subcontractor continually asserted the demarcation point between the originating network, shown as in “#1. OSP, ILEC, CLEC, VOIP Wireless” on the CenturyLink provided diagram, numbered CLC-001454, and CenturyLink’s, as provided under Contract No. E09-196, was at “#3. Intrado RCL (LNG)” on the CenturyLink provided diagram, numbered CLC-001454.

Date Prepared: 11/22/2021
Prepared by: Dawn Cortez and William Leneweaver
Witness: William Leneweaver
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