

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**

*EMAIL ENTITLED "RE: DOCKET No. UT-181051 - CENTURYLINK'S SECOND SET OF
DATA REQUESTS TO COMTECH"*

March 31, 2022

From: Susan Ornstein <Susan.Ornstein@comtech.com>
Sent: Friday, March 18, 2022 11:33 AM
To: Chuck Steese
Cc: Sherr, Adam (Adam.Sherr@lumen.com); Yelena Simonyuk
Subject: RE: Docket No. UT-181051 - CenturyLink's Second Set of Data Requests to Comtech [IWOV-IDOCS.FID4117732]

Chuck,

Thank you for taking the time to speak with us today. We just have one minor correction to the statements below, TSYS was able to locate two documents as you mention, however, I believe these are more accurately classified as responsive to CTL-4, not CTL-9.

Susan C. Goldhar Ornstein | Senior Director, Legal & Regulatory Affairs | Safety & Security Technologies | Comtech Telecommunications Corp. | 202-794-4102 (o) | susan.ornstein@comtech.com | www.comtech911.com | @ComtechSST

From: Chuck Steese <CSteese@atllp.com>
Sent: Friday, March 18, 2022 1:18 PM
To: Susan Ornstein <Susan.Ornstein@comtech.com>
Cc: Sherr, Adam (Adam.Sherr@lumen.com) <Adam.Sherr@lumen.com>
Subject: RE: Docket No. UT-181051 - CenturyLink's Second Set of Data Requests to Comtech [IWOV-IDOCS.FID4117732]

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Counsel:

Thank you for participating in the meet and confer.

To summarize:

1. In response to CTL-9, Comtech has identifies two responsive documents. One Comtech will produce, and the other you have given TNS notice of your intention to produce. The second documents will either be produced, or TNS will step in and seek a protective order.
2. In response to CTL-8, you informed me that Comtech has been unable to identify any responsive documentation.

If any aspect of this summary is inaccurate, pleased let me know.

Regards,



Armstrong Teasdale LLP

Chuck Steese | Partner

4643 South Ulster, Suite 800, Denver, Colorado 80237

MAIN PHONE: 720.200.0676 | MAIN FAX: 720.200.0679

DIRECT: 720-200-0677 | Extension: 3805 | CELL: 303-919-0075

csteese@atllp.com

www.atllp.com

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From: Chuck Steese <CSteese@atllp.com>

Sent: Thursday, March 10, 2022 5:00 PM

To: SUSAN.ORNSTEIN@COMTECH.COM

Cc: Sherr, Adam (Adam.Sherr@lumen.com) <Adam.Sherr@lumen.com>

Subject: FW: Docket No. UT-181051 - CenturyLink's Second Set of Data Requests to Comtech [IWOV-IDOCS.FID4117732]

Counsel:

I just received the Comtech DR responses served almost one week ago (see attached). In reviewing the distribution list in the email below, I am not on it despite being one of the counsel of record for CenturyLink. I am sure this was an innocent oversight. Going forward, please include me in your distributions

Having reviewed the materials, I would like to meet and confer about the adequacy of two responses.

First, Comtech's response to DR CTL-9 states that Comtech found an email exchanged with TNS about diversity, but "Such communications are subject to the confidentiality provisions of our agreement with TNS and, for this reason, are not attached hereto." This is unacceptable. A

protective order has issued in this docket that allows Comtech to produce documents as Confidential. CenturyLink therefore demands the production of this and any other document you have withheld on this basis. If Comtech refuses, we plan to move to compel.

Second, CTL-8. States:

In response to CTL-3(a), you referenced CSRIC 12-10-0594. With regard to CSRIC 12-10-0594:

- a. Describe all steps that you, TNS or any agent and/or consultant took on your behalf to comply with and/or adhere to this standard in connection with your design, construction, and maintenance of your Phase 1 SS7 network in Washington.
- b. Produce all documents showing the steps that you, TNS or any agent and/or consultant took on your behalf to comply and/or adhere to this standard in connection with your design, construction, and maintenance of your Phase 1 SS7 network in Washington.

Comtech's answer is superficial. Among other things, CSRIC 12-10-0594 states that Network Operators and Service Providers should follow industry guidelines for validating SS7 link diversity, which should be performed at a minimum of twice a year, and at least one of those validations should include a physical validation of equipment compared to the recorded documentation of diversity. CenturyLink expected to receive documents showing the efforts Comtech undertook to validate SS7 link diversity twice per year, including physical validation once per year. Once again, CenturyLink demands responsive documents. If Comtech refuses, we plan to move to compel a complete response here as well.

Please let us know how Comtech plans to proceed. I am available to discuss large portions of Friday, March 11, Monday March 14 and Tuesday March 15. Please provide a time(s) that you are available.

Regards,



Armstrong Teasdale LLP

Chuck Steese | Partner

4643 South Ulster, Suite 800, Denver, Colorado 80237

MAIN PHONE: 720.200.0676 | MAIN FAX: 720.200.0679

DIRECT: 720-200-0677 | Extension: 3805 | CELL: 303-919-0075

csteese@atllp.com

www.atllp.com

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From: Susan Ornstein <Susan.Ornstein@comtech.com>
Sent: Friday, March 4, 2022 1:33 PM
To: Sherr, Adam <Adam.Sherr@lumen.com>
Cc: 'Lisa.gafken@atg.wa.gov' <Lisa.gafken@atg.wa.gov>; 'Nina.suetake@atg.wa.gov' <Nina.suetake@atg.wa.gov>; 'Ann.paisner@atg.wa.gov' <Ann.paisner@atg.wa.gov>; 'PCCSeaEF@atg.wa.gov' <PCCSeaEF@atg.wa.gov>; 'Stephanie.chase@atg.wa.gov' <Stephanie.chase@atg.wa.gov>; 'Corey.dahl@atg.wa.gov' <Corey.dahl@atg.wa.gov>; 'Chanda.mak@atg.wa.gov' <Chanda.mak@atg.wa.gov>; 'brice.hartman@atg.wa.gov' <brice.hartman@atg.wa.gov>; 'Sally.brown@utc.wa.gov' <Sally.brown@utc.wa.gov>; 'Harry.fukano@utc.wa.gov' <Harry.fukano@utc.wa.gov>; 'Betsy.demarco@utc.wa.gov' <Betsy.demarco@utc.wa.gov>; 'Adam.wasserman@mil.wa.gov' <Adam.wasserman@mil.wa.gov>; 'Dawn.cortez@atg.wa.gov' <Dawn.cortez@atg.wa.gov>; 'TPCEF@atg.wa.gov' <TPCEF@atg.wa.gov>; 'Laura.reese@atg.wa.gov' <Laura.reese@atg.wa.gov>; 'Maudelle.padilla@atg.wa.gov' <Maudelle.padilla@atg.wa.gov>; Addington, Josie <Josie.Addington@lumen.com>
Subject: RE: Docket No. UT-181051 - CenturyLink's Second Set of Data Requests to Comtech


On behalf of TeleCommunication Systems, Inc. ("TSYS"), please find attached TSYS's responses to CenturyLink's Data Requests Nos. 7-10. Please note that TSYS's response to CTL-9 also supplements TSYS's response to CTL-4(v).

Susan C. Goldhar Ornstein | Senior Director, Legal & Regulatory Affairs | Safety & Security Technologies | Comtech Telecommunications Corp. | 202-794-4102 (o) | susan.ornstein@comtech.com | www.comtech911.com | [@ComtechSST](https://www.comtech911.com)

From: Addington, Josie <Josie.Addington@lumen.com>
Sent: Friday, February 18, 2022 6:34 PM
To: Susan Ornstein <susan.ornstein@comtechtel.com>
Cc: Sherr, Adam <Adam.Sherr@lumen.com>; 'Lisa.gafken@atg.wa.gov' <Lisa.gafken@atg.wa.gov>; 'Nina.suetake@atg.wa.gov' <Nina.suetake@atg.wa.gov>; 'Ann.paisner@atg.wa.gov' <Ann.paisner@atg.wa.gov>; 'PCCSeaEF@atg.wa.gov' <PCCSeaEF@atg.wa.gov>; 'Stephanie.chase@atg.wa.gov' <Stephanie.chase@atg.wa.gov>; 'Corey.dahl@atg.wa.gov' <Corey.dahl@atg.wa.gov>; 'Chanda.mak@atg.wa.gov' <Chanda.mak@atg.wa.gov>; 'brice.hartman@atg.wa.gov' <brice.hartman@atg.wa.gov>; 'Sally.brown@utc.wa.gov' <Sally.brown@utc.wa.gov>; 'Harry.fukano@utc.wa.gov' <Harry.fukano@utc.wa.gov>; 'Betsy.demarco@utc.wa.gov' <Betsy.demarco@utc.wa.gov>; 'Adam.wasserman@mil.wa.gov' <Adam.wasserman@mil.wa.gov>; 'Dawn.cortez@atg.wa.gov' <Dawn.cortez@atg.wa.gov>; 'TPCEF@atg.wa.gov' <TPCEF@atg.wa.gov>; 'Laura.reese@atg.wa.gov' <Laura.reese@atg.wa.gov>; 'Maudelle.padilla@atg.wa.gov' <Maudelle.padilla@atg.wa.gov>
Subject: Docket No. UT-181051 - CenturyLink's Second Set of Data Requests to Comtech

WARNING: External Email: Exercise Caution

Attached is CenturyLink Communications, LLC's second set of data requests to Comtech.

 **Josie Addington**
Legal Assistant
1600 7th Avenue, Room 1506
Seattle, Washington 98191
tel: 206-806-7339 | cell: 206-852-3317
josie.addington@lumen.com

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