

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,

Complainant,

v.

CENTURYLINK COMMUNICATIONS, LLC,

Respondent.

DOCKET UT-181051

PETITION TO INTERVENE

1 Pursuant to WAC 480-07-355 (1), the Washington State Military Department, E911 Coordination Office (SECO) hereby petitions the Washington Utilities and Transportation Commission (UTC) for leave to intervene in the above-captioned docket as an intervener. SECO requests intervention with full party status as described in WAC 480-07-340.

2 The business address of SECO is:

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MS: TA-20 Building 20
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3 SECO will be represented in this proceeding by Robert W. Ferguson, Attorney General, and Dawn C. Cortez, Assistant Attorney General. All documents relating to this proceeding should be served electronically as follows:

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4 SECO is authorized under RCW 38.52.520 to coordinate and facilitate the implementation and operation of enhanced 911 emergency communications systems throughout the state on the behalf of the counties and their Public Safety Answering Points. It also procures and administers the contract for the State's Emergency Services IP network (ESInet).

5 As a part of its coordination of the statewide 911 system, SECO entered into a contract with Quest Communications Company, LLC, which later became CenturyLink, LLC (Respondent) for ESInet services in 2009.

6 In 2015, SECO and Respondent entered into Contract Amendment J to establish the terms of a potential transition of the services to a new provider, as SECO prepared to issue a request for proposals for a new modernized ESInet system and services.

7 In 2016, SECO entered into a contract for ESInet services with Telecommunications Systems. Inc., (Comtech).

8 Between 2016 and 2018, SECO and Respondent entered into additional amendments to the contract to further clarify the terms of the transition of the ESInet services from Respondent to Comtech, and SECO coordinated meetings between the two ESInet service vendors to accomplish the transition.

9 In late December 2018, many 911 calls were not properly routed through the ESInet system to the assigned public safety answering points. SECO was included in the

notifications of the outages and the subsequent meetings to determine the cause of the outage, ensure resolution of the underlying issues, and restore full functioning of the ESInet system.

- 10 As the administrator of the contract for the ESInet services, SECO has a significant interest in, and information relating to, all matters pertaining to its ESInet system and the facts surrounding the December 2018 outage.
- 11 For the foregoing reasons, SECO respectfully petitions the Commission for leave to intervene in this proceeding.

DATED this 29th day of January 2021.

ROBERT W. FERGUSON
Attorney General

/s/ Dawn C. Cortez

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