

**BEFORE THE WASHINGTON
UTILITIES & TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,

Complainant,

v.

CENTURYLINK COMMUNICATIONS, LLC,

Respondent.

DOCKET UT-181051

BRIAN ROSEN

**ON BEHALF OF THE
WASHINGTON STATE OFFICE OF THE ATTORNEY GENERAL
PUBLIC COUNSEL UNIT**

Exhibit BR-32C

Comtech Response to Public Counsel Data Request No. 31 with Confidential Attachment

August 31, 2022

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

REDACTED VERSION

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

***WUTC v. CenturyLink*
Docket UT-181051**

TeleCommunication System, Inc.'s Response to PC Data Request No. 31

General Objections:

TeleCommunication Systems, Inc. ("TSYS") incorporates the following general objections into the data request response provided below:

1. TSYS objects to the data request to the extent that it is overbroad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence, and not proportionate to the needs of the case.
2. TSYS objects to the data request to the extent that it seeks or purports to seek information protected by any applicable privilege or immunity, including the Attorney-Client Privilege and Work-Product Doctrine. Any inadvertent production of privileged or work-product protected material is not a waiver of the status of such work product, nor is any response herein to be deemed a waiver of any privilege, doctrine, or immunity.
3. TSYS's response is provided based on the best information currently available to TSYS after a diligent effort to gather such information within its possession, custody, or control. TSYS reserves the right to amend its response as new information is gathered.

PC-31 Re: Steven E. Turner, Exh. SET-7C at 1 (paragraph 1.1).

Please refer to CenturyLink's Exhibit SET-7C, page 1, paragraph 1.1. Does Comtech agree that paragraph 1.1 establishes the point of demarcation between Comtech and CenturyLink? Explain your answer with particularity.

RESPONSE:

Paragraph 1.1 of CenturyLink's Exhibit SET-7C, which corresponds with Figure 1-1 on page 2 of CenturyLink's Exhibit SET-7C, is TSYS's *proposed* direct, IP-based interconnection with CenturyLink. Due to CenturyLink's refusal to connect to TSYS either (1) directly and (2) via an IP-based interconnection, this was not the point of demarcation between CenturyLink and TSYS at the time of CenturyLink's December 2018 outage. Instead, at the time of the CenturyLink Outage, the point of demarcation between CenturyLink and TSYS is where the red arrow appears in the attached **confidential** diagram "Signaling Path for ESInet1 and ESInet 2."

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

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TeleCommunication System, Inc.'s Response to PC Data Request No. 31

June 8, 2022

Attachment

CONFIDENTIAL

CONFIDENTIAL PER PROTECTIVE ORDER IN DOCKET NO. UT-181051

DESIGNATED AS EXEMPT PER WAC 480-07-160

