

**BEFORE THE WASHINGTON
UTILITIES & TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,

v.

QWEST CORPORATION D/B/A CENTURYLINK QC

DOCKET NO. UT-190209

SUSAN M. BALDWIN ON BEHALF OF PUBLIC COUNSEL UNIT

EXHIBIT SMB-3C

CenturyLink Response to Public Counsel Data Request No. 2, with Confidential Attachment

January 9, 2020

SHADED INFORMATION IS DESIGNATED CONFIDENTIAL PER PROTECTIVE
ORDER IN DOCKET UT-190209
PUBLIC VERSION

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

**Washington Utilities & Transportation Commission v.
Qwest Corporation d/b/a CenturyLink QC**

Docket UT-190209

CenturyLink's Responses to Public Counsel Data Requests 2 through 22 (Confidential)

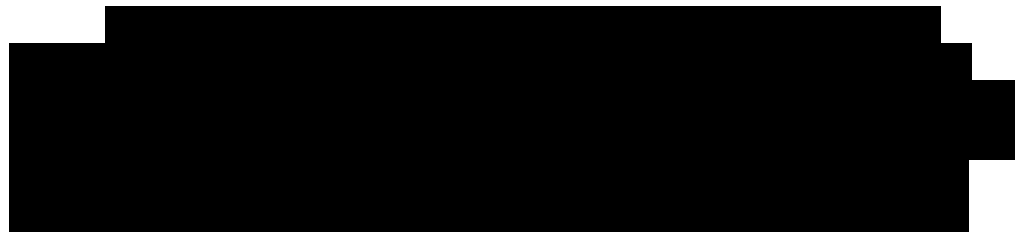
PC-2 Please describe in detail the policies, procedures, and modifications to the 911 system that CenturyLink implemented, if any, after April 2014 up until the July 2017 outage. Please describe in detail the policies and procedures in place at the time of the April 2014 outage to prevent future outages. Specify the timing of such implementation.

Response:

CenturyLink Description of Protective Measures Undertaken Since the 2014 Multistate Outage

CenturyLink and West were involved in a large, multistate 911 outage in 2014 ("2014 911 Outage") that resulted in Consent Decrees for both companies.¹ As a result, both CenturyLink and West implemented numerous safeguards in their respective networks and improved various processes to reduce the likelihood and impact of future 911 failures. Below is a summary of some of those measures:

Additional Diversity. The 2014 911 Outage involved a software coding error that prevented the assignment of trunks for 911 call delivery and routing through West's Englewood Emergency Call Management Center (ECMC). At that time, each Legacy Network Gateway (LNG) was able to route only to its assigned primary ECMC, and during that event calls routed through the Englewood ECMC failed. Since that time, additional connectivity has been installed to provide diversity and enable routing from each LNG to either ECMC in the event there is an ECMC-impacting event. This measure helps mitigate impacts resulting from events that may cause an ECMC to fail.



¹ See *In the Matter of CenturyLink, Inc.*, File No. EB-SED-14-00017187, Order, rel. Apr. 6, 2015 ("2015 CenturyLink Consent Decree") and *In the Matter of Intrado Communications Inc.*, File No. EB-SED-14-00017191, rel. Apr. 6, 2015.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

**Shaded Information is Designated as Confidential
Per Protective Order in Docket No. UT-190209**

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Other Measures Undertaken After the 2017 Outage

At the time of the 2017 partial 911 outage, CenturyLink contracted with a third-party vendor, West, to provide 911 database and routing services. The July 2107 partial 911 outage was caused by a machine error that occurred during a maintenance upgrade to West's 911 equipment, specifically a Metaswitch Call Feature Server. West has provided a summary of the events around the 2017 outage, how those circumstances were different from 2014, and what changes were implemented after the 2017 outage. This summary includes a description of procedures, and modifications to those procedures regarding maintenance of and response to outages in the 911 system.

See Confidential Attachment PC-2 (this is the power point we will use during the settlement discussions that I distributed earlier today)

Respondent: CenturyLink Legal

CONFIDENTIAL ATTACHMENT PC-2

ATTACHMENT IS DESIGNATED
CONFIDENTIAL IN ITS ENTIRETY



