

Agenda Date: September 26, 2019
Item Number: A1

Docket: UT-190745
Company Name: TeleCommunication Systems Inc.

Staff: Rebecca Beaton, Regulatory Analyst

Recommendation

Enter an Order Suspending Tariff filed by TeleCommunication Systems Inc.

Background

On September 5, 2019, TeleCommunication Systems Inc., (TSYS or company) filed a tariff containing descriptions, regulations, and rates applicable to TSYS's provision of regulated E-911 services. The tariff covers the automatic location identification (ALI) database management services provided by TSYS to the state of Washington. The tariff has an effective date of October 4, 2019.

On July 20, 2016, the Washington State Military Department, State Emergency Coordination Office (SECO) announced the statewide E-911 contract was awarded to TSYS. SECO is in charge of the statewide E-911 contract.¹ The customer transition to TSYS network in Washington remains ongoing.

TSYS is subject to the Utilities and Transportation Commission jurisdiction and is subject to the telecommunications company provisions of Title 80 RCW and Title 480 WAC. Specifically, RCW 80.36.080 requires services to be modern, adequate, sufficient, and efficient. WAC 480-120-450 requires companies that choose to provide E-911 services file tariffs with the commission.

Discussion

The transition of the statewide 911 services from CenturyLink to TSYS is ongoing. The TSYS's proposed tariff is not ready to become effective on its requested effective date of October 4, 2019. The filed tariff is missing a critical part of the provision of E-911 service that is called Private Switch/ALI database management service (PS/ALI). It is commission staff's (staff) understanding that the company is in negotiations with a third party vendor for PS/ALI management service to customers that operate Private Branch Exchange (PBX) Customer Premise Equipment.

¹ WAC 118-66-042(1).

Absent PS/ALI database updates, a 911 call would still go through for the PBX customer, but if the customer's individual phone numbers have changed location, emergency services would be sent to the wrong location. Therefore, ensuring all PBX customers have made the transition prior to approval of the tariff is crucial.

Furthermore, staff has identified several issues within the proposed tariff.² Given the impact these services have on public safety, careful consideration of every aspect of the proposed tariff is necessary. Additional time is required for the company to resolve these issues with staff and other stakeholders. After discussions with TSYS and SECO, these parties expressed concurrence with the staff recommendation for suspension of the tariff.

Conclusion

Staff believes that the proposed tariff should include all pertinent elements for provisioning statewide 911 services. Therefore, staff recommends suspension of tariff.

² Staff has identified the following areas of concern: PS/ALI, Liability, Indemnification, Privacy, Definitions, and Pricing.