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Mark Johnson
Executive Director/Secretary
Utilities and Transportation Commission
State of Washington
1300 S. Evergreen Park Dr., SW
Olympia, WA 98504-7250
Records@utc.wa.gov

**RE: TeleCommunication Systems, Inc.
Docket UT-181051, Service Outage December 27-28, 2019
Final PUC Outage Report and Major Outage Report per WAC 480-120-439**

Dear Mr. Johnson,

TeleCommunication Systems, Inc. (“TCS”), together with its parent company, Comtech Telecommunications, Inc. (“Comtech”), hereby voluntarily provides the Washington Utilities and Transport Commission (“Commission”) with redacted and unredacted versions of: (1) a Comtech Final PUC Report and (2) a major outage report, or Root Cause Analysis, containin the information required under WAC 480-120-439 (“Major Outage Report”).¹

TCS requests that the shaded information provided in the unredacted version of the Comtech Final PUC Report and the unredacted version of the Major Outage Report be designated as exempt from disclosure pursuant to WAC 480-07-160. The reason for this request is that such shaded information the Comtech Final PUC Report and the unredacted version of the

¹ In the State of Washington, TCS provides services to cellular and VoIP service providers to enable route determination and the delivery of location information supporting 9-1-1. Additionally, Comtech (or TCS) is the contracted NG9-1-1 service provider for the State of Washington. Since TCS does does not provide any telecommunications services to the general public, TCS is not a “telecommunication company” as defined under RCW 80.04.010 (28).

Major Outage Report is confidential and may also constitute customer-specific usage and network configuration and design information.²

Please contact the undersigned should you have any questions.

Respectfully submitted,

/s/ Susan C. Goldhar Ornstein

Susan C. Goldhar Ornstein

Attachments

² See WAC 480-07-160(2)(b).