



**STATE OF WASHINGTON
MILITARY DEPARTMENT
EMERGENCY MANAGEMENT DIVISION**

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May 22, 2002

Carole Washburn, Executive Secretary
Washington Utilities and Transportation Commission
1300 S. Evergreen Park Drive S.W.
Olympia, Washington 98504-7250

Re: Docket No. UT-990146 – Chapter 480-120 WAC, Telecommunications – Operations

Dear Ms. Washburn:

The Washington State E911 Program respectfully submits comments on the proposed rules for telecommunications operations. The E911 Program is specifically interested in the impact of the rules on 911 systems, but will also make some comments on related items.

Section 480-120-138 requires no charge access to 911 and telecommunications relay service. Telecommunications relay service is now available by dialing 711 and services that use the abbreviated dialing codes 311, 211 and 511 are planned or implemented. The rule should specifically include 711 as permitted to access telecommunications relay and the Commission consideration should be given to including all N11 dialing where available.

Section 480-120-520 changes emergency notification to the state emergency management "authorities" in paragraph three but leaves it "division" in paragraph six. The agency to be informed is the emergency management division of the military department so "division" is organizationally correct. However, "authorities" can be assumed to have the same functionality and would not require a WAC revision should the agency name change at some future date. In either case, the same reference should be used in each paragraph.

Section 480-120-340 paragraph (2)(a) notes that national standards should be used. For clarity that should be further defined by adding to the last sentence after "information", "as published by the National Emergency Number Association". This avoids the confusion that an acceptable standard would be one that is adopted by a telephone company.

Section 480-120-340 paragraph (4)(a) in the first sentence strike the word "the" that follows "maintains the data in". Also, for the same reason as noted above, add after "information", "as published by the National Emergency Number Association".

Thank you for the opportunity to comment on the proposed rules. If you have further questions, please contact me at 253-512-7011 or via email at b.oenning@emd.wa.gov.

Sincerely,

Robert G. Oenning, Administrator
Washington E911 Program
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