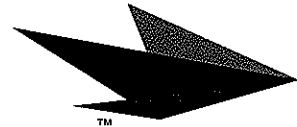


Voice | Data | Internet | Wireless | Entertainment



**EMBARQ**<sup>TM</sup>

Embarq Corporation  
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March 19, 2007

Ms. Carole Washburn, Secretary  
Washington Utilities and Transportation Commission  
1300 South Evergreen Park Drive S.W.  
Box 47250  
Olympia, WA 98504-7250

Re: Rulemaking to Consider Amending WAC 480-120-262(8) Emergency calls –  
E911, Docket No. UT-070199

Dear Ms. Washburn:

This letter constitutes the comments of United Telephone Company of the Northwest *dba* Embarq on the rulemaking to consider amending WAC 480-120-262(8) Emergency calls E911 in Docket No. UT-070199. In response to the specific questions posed by the Commission, Embarq provides the following:

1. *Within a two-week period, how many callers do you advise to hang up and call 9-1-1?*

None.

2. *Within a two-week period, how many callers do you actually transfer to the 911 network?*

Within the two-week period from February 4-17, 2007 in the state of Washington, we received 6 emergency calls, all of which were transferred to the 911 network.

**Nancy L. Judy**  
STATE EXECUTIVE - OR & WA  
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3. *What suggestions do you have for educating those who use operator services that 911 is a better option?*

Operators educate callers at the time of the transfer by informing the customer that they will transfer them to 911. Additionally, the entire inside front cover of Embarq's phone directories is dedicated to 9-1-1 education. The numbers 9-1-1 take up half a page. The text says "For Emergency Only – Dial 911." Icons are depicted for fire, ambulance/medic 1, police, sheriff, and TDD/TTY users. This prominent display may be one reason why our operators receive so few emergency calls. Beyond that, the Emergency Management Division might want to consider public service announcements. Additionally, some newspapers might be willing to run a story on misdialed 9-1-1 calling.

Even with the evolution of OSP services since the time the rule was written, Embarq can comply with the existing rule with the exception of the requirement that the transfer involve a single keystroke. Today, Embarq connects the caller to 911 through the Operator Reference Data Base system ("ORDB"). The ORDB is loaded with all emergency agency information by location, including numbers that have been ported. When a caller dials "0" for the operator and indicates it is an emergency, the operator has one key stroke to get ORDB, one keystroke to get the emergency screen, and one key stroke to transfer the customer to 911. The operator then remains on the line to ensure the caller is connected with the 911 operator. This process occurs very quickly. Embarq therefore recommends the rule be changed as follows:

**(8) Emergency calls.** For purpose of emergency calls, every OSP must be able to quickly transfer the caller into the appropriate E911 system and to the public safety answering point (PSAP) serving the location of the caller ~~with a single keystroke~~ from the operator's console, to include automatic identification of the exact location and address from which the call is being made. The OSP must be able to stay on the line with the emergency call until the PSAP representative advises the operator that they are no longer required to stay on the call. The OSP must provide a toll-free number for direct access to PSAPs should additional information be needed when responding to a call for assistance from a phone using the provider's services. That emergency contact information must not be considered proprietary.

Thank you for your consideration.

Sincerely,



Nancy L. Judy