

Agenda Date: April 25, 2019  
Item Numbers: A4, A5, A6, A7, and A8

**Dockets:** UT-190262, UT-190263, UT-190264, UT-190265 and UT-190266  
**Company Names:** Qwest Corporation d/b/a CenturyLink QC  
CenturyTel of Cowiche, Inc.  
CenturyTel of Inter Island, Inc.  
CenturyTel of Washington, Inc.  
United Telephone Company of the Northwest

**Staff:** Tim Zawislak, Senior Regulatory Analyst  
Rebecca Beaton, Infrastructure Analyst  
John Cupp, Regulatory Analyst  
Nash Callaghan, Assistant Attorney General  
Jing Roth, Assistant Director - Telecommunications

### **Recommendation**

Issue an Order Suspending Tariff Revisions and set these matters for hearing.<sup>1</sup>

### **Background**

On April 8, 2019, CenturyLink filed tariff revisions to remove PS/ALI services from the E-911 section of its Local Exchange Tariff WN U-49.<sup>2</sup> The tariff sheets all include CenturyLink's proposed stated effective date of May 8, 2019.

On April 10, 2019, staff requested information relevant to the potential impact on customers for this public safety related service, and for clarification regarding the customer notice. The company delivered the initial notice to its PS/ALI database management service customers that operate Private Branch Exchange (PBX) Customer Premise Equipment (CPE).

On April 12, 2019, CenturyLink responded to the information requests. Staff is in the process of following up on the review and analysis of those responses in light of ongoing transition issues.

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<sup>1</sup> The Washington Military Department's (WMD) ongoing transition from Qwest Corporation, d/b/a CenturyLink QC (CenturyLink or Company) to TCS d/b/a Comtech (Comtech) for Next Generation (NG) 911 service is not yet complete. Staff recommends suspension, in these cases, rather than rejection, because it would provide a structured process to negotiate with all parties for a more successful transition. Both options would allow Comtech and PBX customers additional time to make the transition to a new third-party provider of Private Switch / Automatic Location Information (PS/ALI) E-911-related database management services, consistent with the transition. Specifically, third party providers that would provide PS/ALI Database update services for PBX customers who otherwise would be left to their own devices.

<sup>2</sup> There are slight variations between the tariff changes proposed in each docket. However, those differences do not effect the general concerns outlined by staff and other parties. Staff recommends suspension for all five proposed tariff changes in all five dockets listed above.

The State Emergency Coordination Office (SECO) is a subdivision within WMD. SECO is in charge of the statewide NG-911 contract.<sup>3</sup> SECO is concerned that an effective date of May 8, 2019, will not allow customers enough time to transition to a third party provider before the service is dropped from CenturyLink's tariff. SECO has filed written comments indicating that 90 to 120 days would be the minimum amount of time necessary to ensure a smooth transition.

Additionally, four PS/ALI customers, including the Lummi Nation, commented on the proposed tariff changes. The customers generally oppose the timing of this filing due to significant logistical difficulties that they would need to address on short notice if the revised tariff becomes effective on May 8, 2019. Staff also discussed the proposed tariff with other interested parties that did not file written comments. In general, these parties expressed concern about customers' capacity to transition prior to the stated effective date.

### **Discussion**

The new NG-911 provider, Comtech, is aware of the issues raised in this docket. Third party vendors, such as West fka Intrado and Red Sky, appear available to provide PS/ALI database management services. These third parties would provide services that update the customer's PS/ALI Database information. However, contracting and implementation issues are likely to take up to three or four months to resolve. CenturyLink has notified the customers of this service, however the company's notice was somewhat misleading with respect to Comtech's role with regard to private switches and did not include the requisite commission contact information.<sup>4</sup>

*There are potentially serious consequences if this service is not picked up by a new provider. Without 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. Staff believes that it is imperative to ensure that this E-911 related service is covered and reliable before the commission allows CenturyLink's proposal to remove this service from their tariff.*

### **Recommendation**

Staff recommends Suspension of Tariff Revisions in all five (5) dockets and to set these matters for a hearing.

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<sup>3</sup> RCW 38.52.540(3).

<sup>4</sup> WAC 480-120-194(4) requires, among other things, commission suggested language or commission contact information with a brief explanation of how the customer can participate in the process.