

[Service Date March 14, 2005]

March 14, 2005

Richard Dickinson
Manager, Public Safety
TeleCommunication Systems, Inc. (TCS)
2401 Elliott Ave., 2nd Floor
Seattle, WA 98121

RE: Rulemaking to review WAC 480-120-450, E-911 obligations of local exchange companies, Docket No. UT-041629

Dear Mr. Dickinson,

Thank you for your comments on the Commission's rulemaking inquiry to consider amendment of WAC 480-120-450 or adoption of additional rules to address the allocation of Enhanced 911 implementation costs between local exchange telecommunications companies and Public Safety Answering Points (PSAPs).

TCS raises the issues of competition in providing the ALI database and "preselective routing" responsibilities. Issues relating to competition are outside the scope of the current rulemaking, which is established to review the cost responsibilities of local exchange companies and PSAPs. Issues relating to competition among data base providers may be the subject for a future rulemaking. Thank you for calling the topic to our attention for possible study.

The Commission values TCS' participation in the subject matter of this rulemaking and welcomes TCS' continued participation.

Sincerely,

CAROLE J. WASHBURN
Executive Secretary