INTRADO INC.'s COMMENTS REGARDING THE NOTICE OF OPPORTUNITY TO FILE WRITTEN COMMENTS RE: RULEMAKING TO CONSIDER AMENDING WAC 480-120-262(8) EMERGENCY CALLS-E911 DOCKET UT-070199 March 20, 2007

Intrado Inc., on behalf of itself and its affiliates (hereinafter referred to as "Intrado"), hereby files the following comments in connection with the Office of the Code Reviser Preproposal Statement of Inquiry (CR- 101) to consider whether to amend WAC 480-120-262(8) Emergency calls (E-911) issued February 7, 2007.

I. INTRODUCTION AND BACKGROUND

A. Statement of Interest

Intrado has played a key role in defining, building and maintaining core emergency communications infrastructure and 9-1-1 technology throughout the United States. Intrado's services, networks and systems support an estimated 200 million 9-1-1 calls each year, including emergency calls from wireline, wireless, Voice over Internet Protocol (VoIP) and other alternative communication technologies. Currently Intrado is deploying the Intrado® Intelligent Emergency Network™, its next generation 9-1-1 system that enables the public safety community to transcend the limitations of the nation's legacy 9-1-1 infrastructure.

Intrado is committed to maintaining the *public safety class* integrity of the nation's 9-1-1 network as demonstrated by its self-imposed operational requirements and 99.99999 percent uptime track record in support of its customers' emergency calling needs. It is further reinforced by Intrado's commitment to industry standards and compliance with regulatory requirements, several of which Intrado has championed.

Intrado and its subsidiaries maintain an in-depth knowledge of public safety, emergency communications management, and telecommunications implementation and policy.

B. Consideration of the Impact of the Current Rule

The memo from Carole Washburn, WUTC Executive Secretary, February 9, interprets WAC 480-120-262(8) as requiring Operator Service Providers (OSP) to be capable of transferring an emergency call to the 911 system with the call routing to the correct Public Safety Answering Point (PSAP) based upon the location of the caller. Subsection (8) reads:

(8) ***Emergency calls.*** *For purposes of emergency calls, every OSP must be able to 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.

Intrado believes it is both appropriate and timely for the WUTC to seek comment from industry as to the reasonableness of the rule and to elevate the issue of OSP emergency call processing.

Recognizing that telephone subscribers may continue to dial "0" in times of emergency instead of the digits "9-1-1", Intrado believes OSPs have a continuing obligation to ensure callers seeking emergency assistance are transferred to the appropriate agency via the native 9-1-1 network and communicating caller location information. Although Intrado acknowledges that recent business market changes and the current limitations of OSP technologies make this requirement technically difficult to achieve in the legacy 9-1-1 environment, Intrado believes that solutions may soon become available as next generation technologies are deployed and technological solutions are developed.

Intrado further believes that in connection with the utilization of any technology coupled with the use of any device from which the digit "0" can be dialed (which creates in the mind of an end user a reasonable expectation that the call will be transferred and natively terminate at the professional work station of a trained public safety call taker), the ALI associated with the call, if placed from an indoor location (wireline, "fixed wireless", etc.), should include at a minimum the caller's street address; and if placed from an outdoor location, should include the latitude and longitude, with dynamic ALI updates, of the caller's location. Thus, OSPs must join with the 9-1-1 industry to aid in the development of solutions that will interoperate seamlessly with their respective technologies and must embrace such capabilities as solutions become available.

II. NEXT GENERATION TECHNOLOGIES MAY PROVIDE SOLUTIONS FOR OPERATOR SERVICE PROVIDER EMERGENCY CALL HANDLING CAPABILITIES

As implied in Ms. Washburn's memo, Telematics, Video Relay Service (VRS) and Telecommunication Relay Service (TRS) providers are striving to establish new capabilities and the technologies that will enable them to directly route emergency calls to the appropriate PSAP along with critical caller location information. Such capabilities may afford similar solutions for emergency calls terminating to an OSP.

Alternative and incumbent OSPs need to become proactive in participating in and seeking technical solutions through industry forums and Standards Development Organizations (SDOs) involved in generating solutions for complex emergency call processing solutions. However, OSPs have been noticeably absent from efforts focused on defining solutions to enable effective and efficient emergency call voice and data delivery to the PSAP.

The Alliance for Telecommunications Industry Solutions – Emergency Services Interconnection Forum (ATIS-ESIF) has numerous Subcommittees focused on integration and interoperability of next generation Internet Protocol (IP) based networks with the legacy emergency telecommunications and/or replacement technologies. Such forums offer a venue for vetting complex issues relating to extending caller voice and location data to the PSAPs and developing technical solutions. Intrado actively participates in such forums and encourages all OSPs to actively participate in the creation of technical solutions to emergency calling through ATIS-ESIF.

Intrado also encourages the WUTC to consider modifying the current rule in a way that stimulates greater involvement on the part of the OSPs in seeking, developing and adopting solutions to current OSP emergency call handling limitations. It is not uncommon for emerging technologies to be slow to promote and/or adopt the creation of business practices and technical solutions that result in efficient and effective fulfillment of emergency call routing responsibilities, without the creation of regulatory rules and requirements that impose requirements on such technology providers to deliver emergency call processing solutions. Regulations and deadlines for performance imposed upon wireless and VoIP service providers y the FCC serve as a good example of what can be accomplished when mandated by a regulatory authority in the interest of the public.

III. INTRADO'S RECOMMENDATIONS

Intrado believes that WUTC WAC 480-120-262(8) is well intended and that it is in the public interest to retain and modify the rule. Many individuals continue to call "0" when seeking emergency assistance, and typically have an expectation that the operator reached will be able to extend their call to the PSAP that is capable of delivering appropriate emergency assistance.

Although technical solutions may be technically difficult in the current legacy 9-1-1 environment, Intrado believes next generation technologies hold promise for resolving OSP emergency call handling problems and recommends the rule be strengthened by establishing reasonable deadlines for compliance that would motivate OSPs to join with industry to seek and adopt interoperable solutions.

Intrado further recommends that the rule should be amended to include provision for the extension of OSP emergency calls via the native 9-1-1 network with

automatic delivery of ALI information containing the address of the caller (if the call is placed from an indoor location) or the latitude and longitude of the caller (if the call is placed from an outdoor location).

Intrado stands ready to assist the WUTC in seeking and defining technical solutions for complex emergency call solutions as the WUTC deems appropriate, and appreciates the opportunity to comment on the current rule in this docket.

Lastly, Intrado perceives OSPs as commonly being involved in the delivery of emergency calls to 9-1-1 and that as such, their services and systems should be inclusive of those principles and minimum performance expectations defined in the attached ***Recommended 9-1-1 Service Standards.*** .

Questions concerning these comments or the attachment may be directed to:

Tom Hicks-ENP
Intrado Inc
Director-Regulatory Affairs
1601 Dry Creek Drive
Longmont, Colorado 80503
(972) 772-5883
thomas.hicks@intrado.com