



STATE OF WASHINGTON

UTILITIES AND TRANSPORTATION COMMISSION

1300 S. Evergreen Park Dr. S.W., P.O. Box 47250 • Olympia, Washington 98504-7250

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April 7, 2017

Mr. Kim Scovill
Vice President, Regulatory and Public Policy
TeleCommunication Systems, Inc.
275 West Street Suite 400,
Annapolis, Maryland 21401

Re: Comtech Telecommunications Corp.'s Duties Under Washington State Law

Dear Mr. Scovill:

The purpose of this letter is to follow-up with you about the meetings you had with Washington Utilities and Transportation Commission (commission) representatives in December and January

TeleCommunication Systems, Inc. has entered into a contract with the Washington State Military Department to provide telecommunications services associated with 9-1-1 service in Washington. Consistent with our responsibility to regulate telecommunications companies in the public interest, the commission takes seriously its role in ensuring reliable provision of 9-1-1 service in the state. Specifically, the commission is tasked under Title 80 RCW with regulating the services, facilities, and practices of telecommunications companies. TCS is properly registered as a competitive telecommunications company with the commission.

Like all competitive telecommunications companies, TCS is subject to the telecommunications company provisions of Title 80 RCW and Title 480 WAC, with the exception of those laws and rules that the commission waives for competitive telecommunications companies pursuant to WAC 480-121-063. Accordingly, TCS must comply with RCW 80.36.080, which requires telecommunications company service to be "modern, adequate, sufficient and efficient." This requirement is vitally important in the context of operating the 9-1-1 network. Because of the high risk to public safety in the event of a 9-1-1 network failure, the commission is very concerned that 9-1-1 service providers design and maintain a functional 9-1-1 network.

TCS must also comply with WAC 480-120-412, which addresses "major outages" and requires all telecommunications companies to, among other things, minimize the effects of major outages and notify the commission and the public safety answering points (PSAPs) of the outage as soon as possible. Major outages include any total loss of service to a PSAP or emergency response agency.

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The commission values timely and consistent communication from the companies it regulates. Good communication is especially important given the implications of 9-1-1 service for public safety. We look forward to developing a cooperative and productive relationship with TCS as the company assumes responsibility for operating the 911 network in Washington.

If you have any questions about the matters addressed in this letter, please contact Jing Roth at 360-664-1291 or jroth@utc.wa.gov.

Sincerely,



Steven V. King
Executive Director and Secretary

cc: Adam Wasserman, Washington Military Department
Robert Ezelle, Washinton Military Department
Andrew Singer, TeleCommunication Systems, Inc.
Jing Roth, Utilities and Transportation Commission
Rebecca Beaton, Utilities and Transportation Commission