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Public Policy



March 21, 2007

Via E-mail

Carole Washburn
Executive Secretary
Washington Utilities and Transportation Commission
1300 S. Evergreen Park Dr., S.W.
P.O. Box 47250
Olympia, WA 98504-7250

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

Dear Ms. Washburn:

Qwest Corporation provides these comments in response to the Notice of Opportunity to Comment, issued by the Commission on February 9, 2007 regarding the CR-101 in this docket. Qwest supports an amendment to the existing rule to reflect the current industry environment. The current rule requires operator service providers (“OSP”) to be able to transfer emergency calls into the 911 system directed to the appropriate public safety answering point (“PSAP”) serving the location of the caller. In order to properly route such calls from end users to the proper PSAP, an OSP must know the NPA/NXXs and the CLLI code of the 911 selective router to determine if the trunk groups are in place to route the calls to the proper PSAP. NPA/NXX information can only be provided by the end user’s carrier. It is Qwest’s experience that a number of carriers do not provide the prerequisite number routing information to allow for the single keystroke transfer that is required by the rule.

While the rule in question may have provided for a technologically appropriate process when it became law, technological changes and end user familiarity with the 911 dialing code have significantly compromised its effectiveness. Calls made from a cell phone do not always provide accurate information to determine the exact location from which the call is being made. Furthermore, adequate cellular number identification information (ANI) may not reside in the 911 selective router database. Similar number routing problems exist with nomadic VoIP

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service. Finally, because of the significant familiarity of the 911 dialing code by consumers, the percentage of 'emergency' calls that Qwest receives by its operators is only .0012% of the total calls it routes to emergency services.

For all these reasons, Qwest proposes that the Commission adopt the following simple, yet effective, rule for transferring emergency calls from OSPs to emergency services:

(8) Emergency calls. Upon receipt of an emergency call, an OSP shall first determine if the caller is capable of terminating the call and redialing 9-1-1. If so, the caller shall be so instructed. If the caller is not capable of terminating the call and redialing 9-1-1, the OSP shall attempt to obtain caller location information and transfer the call to the appropriate emergency service provider serving that location. The OSP shall stay on the line with the emergency call until the emergency service provider advises the operator that they are no longer required to stay on the call.

Sincerely,


Mark S. Reynolds