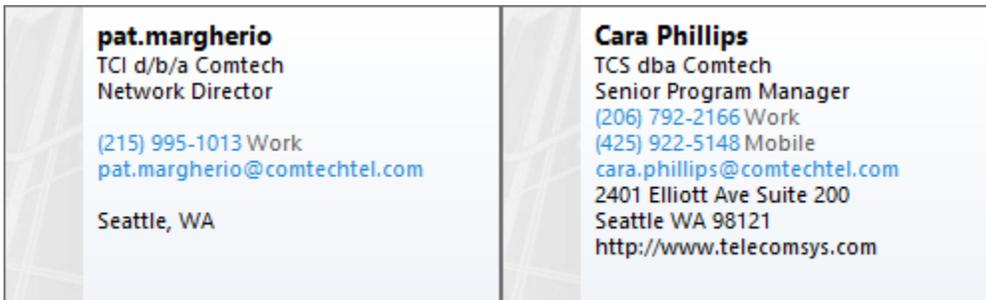


From: Kent Hellebust <Kent.Hellebust@comtechtel.com>
Sent: Tuesday, January 08, 2019 1:54 PM
To: Wasserman, Adam R (MIL)
Subject: FW: UTC Request to Comtech - Outage Report for 911 - 12/27-28/2018
Attachments: TCS 4 2017 UTC Steve King Ltr Duties.pdf

From: Beaton, Rebecca (UTC) <rebecca.beaton@utc.wa.gov>
Sent: Wednesday, January 2, 2019 1:48 PM
To: Pat Margherio <Pat.Margherio@comtechtel.com>; Cara Phillips <Cara.Phillips@comtechtel.com>
Cc: Roth, Jing (UTC) <jing.roth@utc.wa.gov>; Bennett, Sean (UTC) <sean.bennett@utc.wa.gov>
Subject: UTC Request to Comtech - Outage Report for 911 - 12/27-28/2018

Pat and Cara,

RE: UTC Request Comtech Outage 12/27-28/2018



Per the attached letter of 2017, Comtech is required to file with the UTC an outage report and information via email as outages are occurring and by letter to the UTC after the incident in accordance with WAC 480-120-489.

- In the WMD conference call on 12/27 and 12/28, I reminded Comtech staff of the requirement and submitted the information sent to the WMD outage notice to the UTC outage email for information status during the event.

Action: Please send an outage notice and resolution with timeline and impact details regarding the WA outage on 12/27 - 12/28/2018 to the UTC email at telcom-outage@utc.wa.gov
Format for outage report: Final

Comtech Final PUC Report

[Report Number](#) :

[Impacted Company](#) :

[Date and Time](#) :

[TIMEZONE](#) :

[For Questions](#)

[Contact](#) :

[Reason for Outage](#)

Notification :
Cause of Outage :
Location of Outage :
Exchange Name /
Wire Center :
Expected Duration :
Actual Duration :
Number of
Customers/ Cable
pair impacted :
Services Affected :
Agencies Notified :
Significant Update :
Resolution :
Restore Date/Time :

Additionally, Commission staff requests a major outage report within ten days of this outage (12/27/18) by letter to the Commission Director and Secretary Mr. Mark L. Johnston, with a company statement that includes the time, cause, location, number of affected access lines, and the duration of the interruption or impairment, including a description of preventive actives to be taken to avoid future outages. Please see WAC 480-12-489 (5).

Thank you,

Rebecca Beaton, Senior Staff

Regulatory Services Division, Utilities and Transportation Commission

T (360) 664-1287 | M (360) 464-7236 | E rebecca.beaton@utc.wa.gov

Information may be confidential and use by other than addressee is prohibited. This e-mail states the informal opinions of commission staff and are not intended as legal advice. We reserve the right to amend these opinions and Staff opinions are not binding on the commission.

From: Beaton, Rebecca (UTC)

Sent: Friday, December 28, 2018 7:26 AM

To: UTC DL Telecom-Outage <Telecom-Outage@utc.wa.gov>

Subject: Comtech Washington Impairment: INC000000126430 - Updated

----- Forwarded message -----

From: Comtech NOC <na5@na5.xmatters.com>

Date: December 28, 2018 at 3:39:00 AM PST

Subject: High Washington Impairment: INC000000126430 - Updated

To: MIL DL E911 Outages <E911Outages@mil.wa.gov>

Comtech Impairment Notification for Washington

Reference ID: INC000000126430

Status: Updated

Priority Level: High

Incident Start Time: 2018-12-27 01:05:22 PT

Estimated End Time: No ETR on full restoral

Description: 03:35 PT Update - Comtech is seeing traffic processing on the ESInet again. Comtech continues to work with CenturyLink and our network provider to ensure the connections stay up. We are engaging the upstream provider to understand next steps.

PSAPs Affected: All

Please address any questions or concerns to noc@comtechtel.com or contact us at (800) 959-3749.

Pat Margherio

Network Operations Center
Safety and Security Technologies (SST)
Comtech Telecommunications Corp
Phone: 800-959-3749 | Email: noc@comtechtel.com

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STATE OF WASHINGTON

UTILITIES AND TRANSPORTATION COMMISSION

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

(360) 664-1160 • TTY (360) 586-8203

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.

Mr. Kim Scovill
April 7, 2017
Page 2

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