

**Before the
Washington Utilities and Transportation Commission**

In the Matter of)
)
CenturyLink’s San Juan County Communications) Docket No. UT-132234
Plan and Statewide Communications Plan)
)
)

**CONCURRENCE, WITH COMMENT, FROM THE WASHINGTON STATE E9-1-1
COORDINATOR**

The Washington State E9-1-1 Coordinator submits these comments for consideration in the presentation of CenturyLink's San Juan County Communications Plan and Statewide Communications Plan, in compliance with Order 03 - Final Order Accepting and Adopting Settlement Agreement with Conditions.

The Washington State E9-1-1 Coordinator’s Office participated in the multi-stakeholder communication plan development process between late 2015 and early 2016, which resulted in the final drafts of both the Statewide Outage Communications Plan and the San Juan County Outage Communications Plan, filed as Attachments A & B, respectively, to 1-2016 Compliance Filing under docket UT-132234.

The work done during the multi-stakeholder communication plan development process was done cooperatively and with a clear understanding by all parties that this was a Public Safety Communications process requiring the highest priority of effort and attention to detail. While the Washington State E911 Coordinator’s Office would prefer a shorter notification time and a broader definition of what constitutes an outage, we concur with and support the plans that have

been developed, as an upper regulatory limit. As with all planning documents, we believe these plans are subject to refinement, adjustment and regular updating. As refinements, adjustments and updating occur, we will strongly encourage and support efforts to shorten the notification criterion..

Finally, the Washington State E911 Coordinator's Office views these plans as a model for developing a requirement of all regulated providers to provide a similar, fully coordinated Outage Communications Plan, as a condition of providing 911 services within the state of Washington. It is absolutely imperative that the Public Safety Answering Points (PSAPs) be made aware, as soon as possible, when citizens in the PSAP's service area are unable to dial/complete a 911 call. Therefore, the Washington State E911 Coordinator's Office recommends that the Commission take such action as is necessary to ensure that all regulated Telecommunications Service Providers develop a fully coordinated Outage Communications Plan prior to commencing business in the state of Washington.

Respectfully submitted,

WASHINGTON STATE E9-1-1 COORDINATOR'S
OFFICE

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