

March 5, 2003

Carole J. Washburn
Executive Secretary
Washington Utilities and Transportation Commission
1300 S. Evergreen Park Drive SW
P. O. Box 47250
Olympia, Washington 98504-7250

Re: Comments on Qwest's N11 Tariff Filing
Docket UT-030263

Dear Ms. Washburn:

The Washington State E911 Office ("E911 Office") welcomes this opportunity to comment on Docket UT-030236, Qwest Corporation N11 Service Tariff Filing. The E911 Office supports Qwest and other telecommunications companies in their efforts to roll out N11 Services in an efficient and cost effective manner. The introduction of these new services will help to relieve some of the extra load placed on emergency services personnel who often receive calls of a non-emergency nature.

The E911 Office wants to ensure that the implementation of N11 Services will not place additional burdens on the E911 network and its operators, or create confusion for telecommunications customers. Therefore the E911 Office would like to make the following recommendations:

- 1. To reduce customer confusion each N11 Service needs to be introduced simultaneously across the state, or at least within a defined market area.** Customers residing in areas that have not yet implemented an N11 Service, or that may be using a non-participant carrier, may attempt to make an N11 call. If the call is not completed they may access other N11 numbers, such as 9-1-1. If an N11 service is introduced ubiquitously this confusion can be avoided.
- 2. Certain N11 customers may need to have call transfer capability in emergency situations.** Some 211 community service providers, such as abuse or suicide counseling, may find that their caller needs immediate help. The system design should provide the capability to transfer the call to the E911 system. Requesting the caller to hang up and dial 9-1-1 is not appropriate. The transfer should permit the 9-1-1 system to process the call based on the caller's phone number.
- 3. Callers need to know immediately what N11 agency they have reached.** Certain N11 services may use recorded introductions and may require keying or voice recognition in order to access specific information. In cases where callers are having an emergency, callers need to realize immediately that they misdialed

and need to hang up and redial 9-1-1. Systems that use recorded introductions should provide a message that notes that if this is an emergency please hang-up and dial 9-1-1.

The E911 Office realizes that many of these potential areas of confusion can be corrected through proper public education and mutual cooperation between service providers and N11 programs. The E911 Office wants to encourage industry participants to continue their cooperative efforts and would like to thank Commission Staff for their excellent coordination in this Docket.

Sincerely,

Robert G. Oenning
E911 Coordinator
Washington State E911 Office