

04/23/19 15:50

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COMMISSION

From: [Terry Schimon](#)
To: [Public Involvement \(UTC\)](#)
Cc: [Chenvert, Jeremy](#); [Jim Irvin](#)
Subject: Filing UT-190262 Tariff Revision Qwest/Centurylink PS/ALI services
Date: Friday, April 12, 2019 1:19:16 PM
Attachments: [State of WA 911 ALI Provider Change - PSALI Services.msg](#)
[RE Direct ALI Portal Access for PS-ALI.msg](#)
[State of WA 911 ALI Provider Change - PSALI Services - West Safety Services follow up information.msg](#)

Hello,

15 business days from today to have a system/processes in place to accommodate the 5/8/19 Centurylink cutoff date is unreasonable.

This date needs to be pushed out based on the amount of work needed to continue providing accurate phone location info for our 911 callers.

Initial notice of this tariff revision from the email (attached) from Theresa at West (formerly Intrado) on 4/9.

Left a voicemail for Theresa on 4/9.

Called another West contact on 4/10 who referred me to send an email to Theresa to get a response.

4/11 Theresa at West called me and sent an email with some contract info, initial pricing and offerings. I responded with questions but no direct response to all questions.

4/12 just received and attached a group email from Theresa answering generic questions she has received. Something to note in this email is that "if" we chose West for PSALI service, typical setup time is between 30-90 days.

On 4/10 Andy Leneweaver from the Washington State 911 Coordination Office called me to see if we have been contacted about this change, he also emailed Comtech with my info.

On 4/11 Andrew Singer from Comtech emailed that they are not providing PS-ALI service and must use a third party from a list we haven't seen yet. Attached my email response with questions.

No communication from Centurylink has been received to date.

Background:

Pierce County have been using and paying Centurylink for PS/ALI service for almost 25 years. We provide telephone service for all Pierce County agencies, Tacoma Pierce County Health Department & South Sound 911.

We have about 7400 DID's, 4000 phones, 60 addresses and 300 locations (building, floor, room) identified in our PS/ALI database in Pierce County.

When a phone number is moved to a new location, we have to update the location in our tele-management system and then it automatically uploads these changes in NENA format to West(Intrado) daily (Phone moves between locations and updates to West occur almost every business day).

Concerns:

- Timeframe to convert to another system, vendor, process is unreasonable, 5/8/19. Probably need at least 6 months for a project of this scope.
- Correct phone location information provided to the PSAP is a service we need to provide to our customers.
- We need to be able to update this location in a timely manner for the life-safety of our phone users.
- Initial cost estimates for this service from West is substantially higher than currently paying and budgeted for and looks to be linked to a 3 year contract.
- West is not be the only provider of these services – service offering options from other companies will need to be investigated, RFP may be required.
- The West offering is dependent on us applying for a Customer ID with NENA. Process, costs and timeframe yet to be determined.
- The West offering processes are different than current file upload/download to check for file structure and errors.
- Changes will need to be made to our in house tele-management system. Costs for these changes from the vendor, validation, testing to be determined depending on the new solution.
- Validation & testing of any changes time needed
- We were planning in 2020 changing drastically our 911 call routing strategy and PSALI updates. If we have to rush to get service in place that is like we are currently doing it, will require a bunch of rework
- Other projects that we are currently working on this year will be delayed and not be completed on time.

- We are not the only PSALI customer that have been contacted about this change only this week. I was at an local AVAYA user group meeting yesterday morning and many, if not all of the organizations attending are affected (Local government, schools, medical, large & small corporations).
Expect to receive more comments regarding this timeframe.

Please let us know what the WUTC plans are for this tariff revision request and if any questions regarding this email.

Thanks,

Terry Schimon

Pierce County

IT Infrastructure & Operations, Voice Services

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