

Docket # UT-041629

Commenting Party: Lorlee Mizell, Director
Spokane County 911
1620 N. Rebecca
Spokane, WA 99217

Date: 12-08-04

Subject: E911 obligations of local exchange companies and amendment of WAC 480-120-450 to establish a uniform demarcation point in the E9-1-1 network for carrier cost recovery.

Comments:

Spokane County supports the amendment to WAC 480-120-450, creating a uniform demarcation point in the E9-1-1 network, thus establishing a uniform demarcation point for a method of cost allocation between local exchange carriers and the PSAP.

This would establish parity between ILECs, CLECs and wireless carriers as far as 9-1-1 and telecommunications responsibility for connectivity funding is concerned. As new technologies emerge that provide access to 9-1-1 systems, it is critical to have a clearly identified point of demarcation for cost allocations.

A change to WAC 480-120-450 would also assist in stabilizing 9-1-1 operational budgets. Revenues from wireline taxes are leveling out and likely to decrease in the near future. VOIP may not offer the same level of support we currently receive from wireless and wireline tax revenue. A clear line of demarcation for all 9-1-1 service providers would greatly assist counties in planning annual budgets and ensuring funding is available for the connectivity from the selective router to the PSAP.