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April 26, 2012

Via E-mail and UPS

Mr. David Danner, Executive Director and Secretary
Washington Utilities & Transportation Commission
1300 S. Evergreen Park Drive SW
P.O. Box 47250
Olympia, WA 98504-7250

Re: Docket No. UT-100820
CenturyLink's Response to the Commission letter of April 16, 2012

Dear Mr. Danner:

CenturyTel of Washington, d/b/a CenturyLink ("CenturyLink") is writing in response to the Commission's letter of April 16, 2012, asking CenturyLink to respond to concerns raised in the April 10, 2012 letter from Deputy Raymond Maycumber to the Commission.

The letter discusses concerns about 911 service quality and reliability, as well as concerns about the quality of telephone service in the Keller area of Ferry County.

911 Issues - With regard to 911 service in Ferry County, Deputy Maycumber states he has received reports that some of the calls that are transferred to the Tribal PSAP (Public Service Answering Point) from the Ferry County PSAP are of poor audible quality, and that it appears that they do not always carry ANI/ALI information.

CenturyLink has researched this issue and the results of that research are described here. In summary, CenturyLink is not aware of any current trouble reports, repair tickets, or chronic issues with the Tribal PSAP. If any PSAP experiences line quality problems, or missing ANI/ALI information, the PSAP should contact the CenturyLink 911 service center and open repair tickets.

The Tribal PSAP is located in Nespelem, in the Tribal Headquarters building. This is a secondary PSAP, which means that it does not receive 911 calls directly, but rather receives transferred calls only, primarily from the Ferry and Okanogan County PSAPs. If the Tribal

PSAP wanted to receive calls directly, it could contact the CenturyLink Account Manager to discuss the necessary arrangements to be a primary PSAP. However, it does not appear that the fact that calls are being transferred in should be creating any problems.

CenturyLink is aware that the Tribal PSAP uses Intrado Lifeline 100 equipment. While this is not the newest model of 911 equipment, it is sufficiently modern to receive transferred ANI/ALI data. The Colville Tribe owns and is responsible for maintaining that equipment. CenturyLink does offer maintenance contracts for this type of equipment, and on request could perform a site survey to see if a maintenance contract could be offered on this specific equipment.

After receiving the letter from Ferry County, CenturyLink's Service Manager for 911 and Local Governments, Kathleen Miller, placed a call to the Tribal Police and spoke with Police Chief Haney. He asked that she talk to his Dispatch Supervisor, Alice Smith, who is more familiar with the daily routine. Ms. Miller reports that she asked Ms. Smith about audio quality and receipt of ANI/ALI. Ms. Smith said that before migration to the Next Gen ANI/ALI network, when ANI/ALI was delivered via frame relay circuits, they would occasionally receive ANI with missing digits. That may have generated calls back to the primary transferring PSAP to retrieve the missing information. Ms. Smith said that since the tribes migrated to ANI/ALI delivery via the Next Gen network they have not had any more problems with ANI/ALI delivery. The Colville Tribes migrated to the Next Gen network on July 26, 2011. Ms. Smith said that the audio quality was fine both before and after the Next Gen migration.

Ms. Miller further described her role as Service Manager to Ms. Smith and asked her if there were any outstanding service issues. Ms. Smith was gracious and appreciative of the call. She said she does not have any service issues currently but will contact Ms. Miller if anything comes up. Ms. Miller sent her an email with her contact information.

The Next Gen network that serves the Tribal PSAP consists of two Next Gen T1s, one from Yakima and one from Spokane, so there is full diversity. Calls transferred from the Primary PSAPs go to the Tribal PSAP over one of these routes. There has never been a trouble report on the Spokane path, and there has only been one on the Yakima path that was resolved when the circuit was turned up.

In conclusion, CenturyLink does not dispute that some of the concerns reported by Deputy Maycumber, such as missing ANI/ALI data, may have been issues under the prior 911 network, but does not believe that those issues persist.

Residential Service Quality – Deputy Maycumber also describes residential service quality issues in the area north of Keller, mentioning service outages, lack of Caller ID and other enhanced services, and “party line” service.

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CenturyLink has responded to many of these issues in its prior letter of April 12, 2012, but will address these issues here as well in order to provide a comprehensive response to the Commission.

Residential service in the Keller area is provided over a CM8 carrier system, which allows more than one customer to be served over a single loop facility. This is not party line service, as each customer has his or her own dedicated frequency on the line, and multiple calls can take place simultaneously. The CM8 carrier system is relatively common equipment in sparsely populated areas, and is in use in both legacy Qwest and legacy CenturyLink service territory, not just Tribal land. The CM8 facilities do not support incoming Caller ID and other enhanced services, but *do* transmit ANI/ALI information on an outbound 911 call.

CenturyLink responds promptly to repair calls and trouble tickets, and does its best to maintain service in the Keller area. However, there are many miles of feeder and distribution cable serving very few customers, and CenturyLink frequently finds that its facilities are damaged either due to encounters with vehicles, or due to weather or other issues. As previously noted, there is a section of cable that was damaged by a fallen tree, leading to the need to replace a long section of cable – it may be that this is the cable referenced by Deputy Maycumber as being affected by heavy rains. The cable is scheduled to be repaired, but the construction season has just recently begun in this area and the project is still in the design and permitting phase.

CenturyLink does not find that there are a disproportionate number of trouble reports by wire center in this area, compared to other wire centers, and measured against the Commission's standard.

If the Commission would like to have further discussion on these issues, CenturyLink respectfully requests that the Commission move the issues to a new docket, and not encumber this docket with this relatively narrow and focused set of issues. It may also be that the Commission would be interested in a less formal discussion, outside of an administrative proceeding, and CenturyLink is willing to participate in that as well.

Sincerely,

Lisa A. Anderl