

February 13, 2001

Concerning:

Washington Utilities and Transportation Commission  
Docket No. UT-990146  
Telecommunications – Operations

Comments from:

Emergency Management Division  
Washington Military Department  
Enhanced 911 Program

The Emergency Management Division (EMD) of the Washington Military Department has responsibilities for coordination of disaster planning, mitigation and response as well as coordination of Enhanced 911, statewide. Telephone systems are key to the citizen, not only to report emergency situations; these also are integral to the communications necessary to assure appropriate response. The reliability is critical, and historically has been outstanding. The performance of telephone systems in emergency or disaster situations has been, to a large degree, due to the planning efforts of telephone companies. The company efforts have been complimented by integration and exercises of their plans with those of public agencies like the Commission and Emergency Management. The proposed revisions to WAC 480-120-530 and the new WAC 480-120-531 support EMD's mission both by formalizing the requirement for planning by all companies in what is an increasingly complex technical environment and by providing for ongoing quality assurance.

WAC 480-120-530 assures that the critical links of the Enhanced 911 system are maintained in operable condition. The design of 911 systems dictates that dedicated facilities are in place which exceed in capacity what is required for general traffic loads. These facilities must be fully operational when needed. That assurance can only be achieved by an aggressive testing and maintenance program. These provisions provide for that assurance and also provide for the public safety answering point to be notified promptly of 911 network problems. Notification permits the public safety agencies to become a partner with the carriers, if necessary, to implement mitigating measures lessening the impact of the outage, or even to provide assistance to the carrier to facilitate more rapid repair.

WAC 480-120-531 provides for telephone company contact information that public agencies must have if they are to contact companies concerning outages. The first indication of a serious telecommunications network problem frequently is a contact to a public safety agency. When 911 outages occur, the PSAPs notify the Emergency Management Division's 24x7 operations center of the situation as well as contacting the serving telephone company. Major emergencies or disasters can endanger not only the citizen's primary access to emergency assistance, 911, but also major network elements. The provisions in WAC 480-120-531 provide for a capability to contact all carriers to coordinate repair efforts as well as a forum for the Commission to assure that planning activities are ongoing to mitigate the impacts of potential disasters and plan for effective response efforts. A major strategic goal of EMD is to develop mitigation for all critical facilities to limit the impact on citizens during emergencies and disasters. Carrier planning is essential to that goal and the Commission continues to be a very active participant in the EMD efforts. This WAC will reinforce those relationships.

Submitted by:

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