



GRAHAM & DUNN PC

UT-030455
Ⓟ N/A

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April 2, 2003

Ms. Carole Washburn
Secretary
Washington Utilities and Transportation Commission
P.O. Box 47250
1300 South Evergreen Park Dr. S.W.
Olympia, WA 98504-7250

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STATE OF WASH.
UTIL. AND TRANSP.
COMMISSION

**Re: Petition of Verizon Northwest Inc. for
a Waiver of Certain Provisions of
WAC 480-120-450(2)(a) and (2)(b)**

Dear Ms. Washburn:

Enclosed for filing is one original and 19 copies of the above-entitled Petition. We have enclosed an additional copy and would appreciate if you would date-stamp it, indicate the assigned docket number and return it to us in the enclosed self-addressed stamped envelope.

Please contact the undersigned if you have any questions. Thank you.

Sincerely,

GRAHAM & DUNN PC

Judith A. Endejan

JAE/amd
m24965-418306.doc
Enclosures

cc: Kimberly Douglas (w/encl.)
Joan Gage (w/encl.)

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STATE OF WASH.
UTIL. AND TRANSP.
COMMISSION

BEFORE THE WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION

REQUEST FOR A WAIVER OF CERTAIN)	Docket No.
PROVISIONS OF WAC 480-120-450 (2)(a) and)	
(2)(b))	PETITION of VERIZON NORTHWEST
)	INC.
)	
)	

INTRODUCTION

Pursuant to WAC 480-120-015 Verizon Northwest Inc. (“Verizon”) petitions the Washington Utilities and Transportation Commission (Commission) for temporary waivers of WAC 480-120-450 (2)(a) and (2)(b), which require Verizon to implement an internet-based method to maintain customer records in the E911 data base. Verizon cannot satisfy these rules until December 31, 2004, because Verizon does not have an internet-based method at this time. Verizon is working with its vendors to create this method, and expects its vendors to complete their work by the end of 2004. Requiring Verizon to comply with the new rules prior to December 31, 2004 would impose an undue hardship on Verizon.

I. DISCUSSION

On December 16, 2002, the Commission filed new rules with the Code Reviser that includes the following provisions:

WAC 480-120-450 (2)(a) and (2)(b):

- (2)(a) LECs that provide or make available E911 data base management, whether directly or through contract, must provide to all PBX owners or their agents (including LECs) a simple, internet-based method to maintain customer records in the E911 data base, and the LEC may provide an option of a secure dial up access method for the PBX owner or agent to maintain customer records in the E911 data base. The method must use a generally accepted national format for customer record information.

- (2)(b) LECs that provide or make available E911 data base management, whether directly or through contract, must provide or make available to all other LECs a simple, internet-based method to maintain customer records in the E911 data base for their non-PBX customers, and the LEC may provide an option of a secure dial up access or direct data link method for LECs to maintain customer records in the E911 data base. Methods for maintaining station location information that are not internet-based may be offered in addition to the required internet-based method.

Verizon has been working with its 9-1-1 systems application vendor to develop a new product called "9-1-1 Information Manager" throughout Verizon's former GTE footprint, including Washington State. This product, which is under development, will allow PBX owners and competitive local exchange companies (CLECs) to maintain customer records in the E911 data base via an internet-based method.

Phase 1 of the product is directed towards meeting the problem reporting and database reporting needs of the public safety answering points (PSAPs) and County Master Street Address Guide (MSAG) coordinators. Phase 1 allows the PSAPs to communicate either through the County coordinator or directly to Verizon either misrouted 9-1-1 calls or 9-1-1 calls with incorrect or missing location information. It also provides a means of submitting and managing MSAG changes via a browser-based interface to Verizon. This phase is in the final stages of development, and Verizon is preparing to perform its own acceptance, performance, and system integration tests. We do not believe Phase 1 of the product will be in production before December 31, 2003.

Phase 2 of the product is the application that will provide the internet-based access the Commission's rules require for CLEC and Private Switch / Automatic Location Identification (PS/ALI)¹ users. Verizon recently submitted business requirements to its vendor for this phase. Once the requirements are agreed upon and completed, the vendor will begin development and testing. Verizon anticipates that Phase 2 will not be released for testing before the end of March 2004. Due to the rigorous testing required, Verizon has a targeted production date of December 31, 2004.

¹ PS/ALI is a means for PBX (Private Switch) managers to submit address (and other specific location) information to the DBMS.

Verizon currently plans to deploy both Phase 1 and Phase 2 of the "911 Information Manager" product on the Long Beach data base management system (DBMS) that serves the state of Washington.

Until the product is completed, CLECs will continue to have a secure dial-up access method available to them for maintenance of their records, which is an option in WAC 480-120-450 (2)(a) and (2)(b). PBX owners also have a secure dial-up access method available to them. They may use any software, or they may purchase Verizon's PS/ALI software to deliver a National Emergency Number Association (NENA) formatted file containing their updates to Verizon's ALI Gateway system.

Accordingly, Verizon requests a waiver from WAC 480-120-450 (2)(a) and (2)(b), effective immediately, until December 31, 2004.

Respectfully submitted this 2nd day of April, 2003.

GRAHAM & DUNN PC

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