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BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

PETITION FOR CLARIFICATION OR
WAIVER OF WAC 480-120-450 (2) (e) AS
ADOPTED ON DECEMBER 16, 2002 IN
DOCKET NO. UT-990146 AND EFFECTIVE
JULY 1, 2003

Docket No. UT-_____

QWEST CORPORATION'S PETITION FOR
CLARIFICATION OR WAIVER

Qwest Corporation ("Qwest") hereby petitions the Washington Utilities and Transportation Commission ("Commission") for clarification or, in the alternative, waiver of WAC 480-120-450(2)(e). This rule was developed through proceedings in Docket No. UT-990146¹ and becomes effective on July 1, 2003.

THE RULE

On December 12, 2002, the Commission filed with the Code Reviser General Order No. R-507, which included the newly developed rule WAC 480-120-450, Enhanced 9-1-1 (E911) obligations of local exchange companies. As adopted, section (2)(e) reads as follows:

E911 data base errors and inquiries, including selective routing errors, reported by county E911 data base coordinators or PSAPs must be resolved by the LEC or its agent administering the data base within five working days of receipt.

¹ In the Matter of Amending, Adopting and Repealing Chapter 480-120 WAC Relating to Telephone Companies, Docket UT-990146, General Order No. R-507, Order Amending, Adopting and Repealing Rules Permanently, Filed with the Code Reviser's Office December 12, 2002.

1 **DISCUSSION**

2 Qwest seeks this clarification or waiver to address those circumstances where errors and inquiries
3 concern services not provided by Qwest. Qwest seeks clarification that the rule only applies in cases
4 where the LEC is the service provider. Alternatively, Qwest seeks waiver of this rule where Qwest is not
5 the service provider.

6 Qwest appreciates the need for accurate E911 information and can and will comply with the rule
7 in those cases where Qwest is the service provider. However, Qwest also receives reports of data base
8 errors and inquiries from PSAPs concerning services that are not provided by Qwest. These services
9 may be provided by another local exchange carrier, a pay phone service provider, or a wireless service
10 provider. Upon receipt of a report of an E911 data base error or inquiry, Qwest will conduct an initial
11 investigation. If the error or inquiry concerns service provided by Qwest, then Qwest will resolve the
12 issue pursuant to the rule. If upon investigation, it is determined that the error or inquiry concerns
13 information or service provided by another provider (e.g., another local exchange provider, a pay phone
14 service provider, or a wireless provider), then Qwest will refer the case to the other provider for
15 resolution.

16 For example, pursuant to WAC 480-120-263(5)(c), Pay Phone Service Providers (PSP) leasing
17 public access lines (PAL) from a LEC are responsible for supplying the LEC with the phone instrument
18 location if that location is different from the access line demarcation point. When an E911 error or PSAP
19 inquiry is received, Qwest will conduct an initial investigation. If the issue concerns the location of the
20 demarcation point for a non-Qwest pay phone, then Qwest will update records to correct the location of
21 the demarcation point. However, if the issue concerns the location of the pay phone instrument, which
22 may be different from the demarcation point, then Qwest will need to refer the inquiry to the PSP for
23 resolution. Qwest has no independent knowledge of the location of pay phone instruments that Qwest
24 does not own. In the case of a resold or UNE-P PAL line, Qwest will refer the inquiry to the local
25 exchange carrier that is leasing the PAL line from Qwest.

26 When E911 errors or PSAP inquiries involve services provided by another local exchange

1 provider or wireless provider, Qwest will conduct an initial investigation to verify its records. If the
2 inquiry concerns information provided by the other service provider, then Qwest will refer the inquiry to
3 the appropriate provider for resolution.

4 Qwest will conduct its initial investigation and refer the error or inquiry within three working days.
5 Upon receipt of updated information from other service providers, Qwest will update its records pursuant
6 to Section 2(c) and (d) of the Rule.

7 **CONCLUSION**

8 Granting this waiver will ensure that the responsibility for providing accurate E911 information,
9 resolving errors and PSAP inquiries, is assigned to the appropriate service provider. For the reasons
10 stated above, the Commission should clarify that WAC 480-120-450(2)(e) only applies where the LEC
11 receiving the notice of error or inquiry is also the service provider. Alternatively, if the Commission does
12 not believe such clarification is appropriate, the Commission should grant Qwest a limited waiver of the
13 rule as set forth herein.

14 RESPECTFULLY SUBMITTED this ____ day of March, 2003.

15
16 QWEST CORPORATION

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