

March 30, 2001

Mr. Bob Shirley
Washington Utilities and Transportation Commission
1300 South Evergreen Park Drive SW
Post Office Box 47250
Olympia, Washington 98504-7250

RE: RULEMAKING CONCERNING REVERSE SEARCHES OF E-911
DATABASES
Docket UT-990146

Dear Mr. Shirley:

Reverse search is a functional augmentation to Enhanced 911 (E911) systems that provides a significant additional resource to facilitate delivery of assistance in emergencies. Its inclusion as rules under WAC 480-120-350 was complimentary to the existing provisions elsewhere, that permit E911 access to all telephone customer address information without regard to customer restrictions on the publication of that data. When considering reverse search it is helpful to define what it is and why it is important to public safety:

Reverse search is the term used to describe the ability to search the enhanced 911 data bases for customer information related to a particular phone number with the number entered by the Public Safety Answering Point (PSAP) personnel. Technically this is the same process that is automatically done when a caller dials 911, the difference being whether the data look up is automatically generated by the callers action, dialing 911, or by the PSAP. The result, dispatch of assistance, is the same without regard to how the data keys were generated.

Reverse search has value when the caller, who typically has dialed 911, is reporting an emergency at a different location, and the caller verbally gives the phone number of the person in need of assistance to the PSAP personnel. Access to the 911 data base permits acquiring the location information that would be available had the person in need of assistance actually dialed 911. The most common events are calls where someone collapses when talking to a second party, and that second party calls 911 to report the incident.

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A common occurrence finds someone calling a friend when they are not feeling well thinking that they should not call 911 because it is a minor problem and collapsing during the conversation. To the PSAP this report is every bit as important as a direct 911 call.

Protocol generally has the PSAP calling the reported number to verify the situation if possible, either before or after aid has been dispatched dependent on the circumstances. Protocol also is to never give the caller the address that is displayed when the given phone number is used to retrieve the address record. This reflects the normal operating procedures of always asking the address of the caller for all 911 calls and at most verifying to the caller that what is displayed is correct.

When the agreement was originally reached to permit reverse search it was tempered by the State v. Butterworth case where a detective had used telephone company sources to get the address of an unlisted number. The E911 databases were not involved. However, it does illuminate a concern that having a capability at the PSAP to look up addresses based on phone number could be misused. To address those concerns language should be included, as was proposed, that limits the use of the information supplied by telephone companies for E911 databases to emergency use only. This reflects the current federal statute, which is aimed primarily at customer information derived from wireless telephone service records.

Also included in WAC 480-120-350 were provisions for documentation concerning the use of reverse search to be retained for three years. This retention time for records relating to reverse search is a unique requirement on PSAPs. Currently the voice recordings of conversations are limited to a 90-day retention schedule. A similar treatment is appropriate for records of reverse search activities.

Reverse search is a life saving feature. It should be available to Public Safety Answering Points with minimal record keeping and appropriate restrictions of use provisions. To achieve that goal it may be appropriate that the Washington Utilities and Transportation Commission provide rules that define the authorization for carrier records to be made available to permit reverse search.

Sincerely,

Robert G. Oenning
Washington State E911 Administrator

RGO:tcl

cc: Theresa Jensen, Qwest
Major General Lowenberg, Military Dept.