



STATE OF WASHINGTON
MILITARY DEPARTMENT
EMERGENCY MANAGEMENT DIVISION

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August 12, 2003

Ms. Carol Washburn, Secretary
Washington State Utilities and Transportation Commission
Chandler Plaza Building
Post Office Box 47250
Olympia, Washington 98504-7250

Re: Docket UT-031301, Petition for Exemption for Advanced Telecom, Inc.

Dear Ms. Washburn:

The Washington State E911 Office respectfully recommends that the Washington Utilities and Transportation Commission deny the request for exemption in Docket UT-031301.

WAC 480-120-183 (2)(b) requires telecommunications companies that discontinue service to notify the State E911 Office 30 days prior to the cessation of service. On August 12, 2003, the State E911 Office received notice from Advanced TelCom Group that Advanced TelCom, Inc., dba Advanced TelCom Group and Shared Communications Services, Inc. (together "ATG"), will be discontinuing its provision of "Residential Multi-Tenant Services" effective August 15, 2003. Unfortunately the letter we received did not include an attachment indicating which locations and which counties were impacted. Essentially this petition for exemption places the State Office and counties in the position of having less than three days notice to notify call takers, dispatchers, and emergency services that telecommunications service at certain apartment complexes is in transition, and may impact emergency response times.

WAC 118-68-060 (b) requires the following information be available to the 911 call takers for multi-tenant locations:

- 1) customer name,
- 2) street address and city, and
- 3) building unit identifier, or additional information supplied by automatic simultaneous connection of the caller, the PSAP (public safety answering point) and a knowledgeable individual(s) who will be able to supplement the ALI (automatic location information) record with specific location information by effectively communicating with the PSAP.


This situation becomes particularly acute in King County where multiple jurisdictions are involved. The month of August creates additional delays within the 911 community due to a large national meeting of 911 professionals now taking place in Indiana, plus a number of key employees usually are on vacation.



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In this instance we request that the 911 community be given its normal 30-day interval, and that ATG's petition for exemption be denied.

Sincerely,



for Robert G. Oenning
Statewide E911 Administrator

RGO:tl

cc: Sharyn Bate, Washington Utilities and Transportation Commission
Glenn Blackmon, Washington Utilities and Transportation Commission