



RIVERCOM 911

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RiverCom Administrative Board:

Keith Goehner, Commissioner, Chelan County

Dan Sutton, Commissioner, Douglas County

Keith Huffaker, Councilmember, City of Wenatchee

Wayne Barnhart, Councilmember, City of East Wenatchee

Ray Coble, Assistant Chief, East Wenatchee Police Department

November 27, 2017

Mr. Steven King
Executive Director
Washington Utilities and Transportation Commission

Dear Mr. King,

RiverCom is withdrawing the complaint filed on September 29, 2017 (Docket UT-171016). RiverCom is a small agency and does not have the resources required to move this complaint forward. RiverCom appreciates the extra time we were granted so that we could meet with the parties involved in this outage. We were able to meet with representatives from Frontier Communications and Century Link on November 1, 2017 to discuss the outage and steps moving forward. We believe that Century Link has taken steps to improve monitoring of 9-1-1 trunks such that they would receive alarms if the trunks were in a constant busy state. However, we remain unsure of plans that Frontier has to address the issues at the heart of the complaint. In an email dated November 2, 2017, Frontier states that we (RiverCom) had "follow up questions and that (Frontier) would get back to us with additional information around outage notification and steps to best monitor the system going forward". RiverCom has not received any of this additional information.

Part of the complaint centered on the duty of wireline carriers to notify PSAP's when an outage takes place as required in Washington Administrative Code (WAC) 480-120-412 (2). Frontier assured us that the problem with outage notifications and 9-1-1 trouble tickets has been resolved – if we notify them of the outage. The other side of this is Frontier's and Century Link's duty to notify PSAP's of outages on their systems. The notification that occurred during the August 23, 2017 outage was a series of emails from Century Link confirming to RiverCom that there was an outage (we had notified Century Link of the outage) with no notification from Frontier. Further, we do not believe that Frontier has made changes needed to provide accurate monitoring of the dedicated 9-1-1 trunks that are part of the T-1 lines where those 9-1-1 trunks reside as required in WAC 480-120-401 (6). This situation leaves Frontier unable to monitor those 9-1-1 lines and/or detect an outage affecting only the 9-1-1 trunks which is what occurred on August 23, 2017. This outage was larger than the area covered by RiverCom but there were apparently no 9-1-1 calls place from areas outside of Chelan and Douglas County, thus the outage was never noticed by those customers. We believe that nothing has changed with practices and or procedures that would cause a notification to made to RiverCom or any impacted PSAP should we experience a similar outage today. We do not believe that the issue has been fully addressed by Frontier, but again we lack the resources to take further action. This places a number of customers in Chelan and Douglas Counties who rely on Frontier wireline phones at risk of not being able to complete a 9-1-1 call on their phone when those trunks are in a "busy" condition.

Thank you very much. If you or the Commission has any questions, please contact me.

Sincerely,

James C. Fosse
Director

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