BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,

DOCKET UT-190262 (Consolidated)

Complainant,

v.

QWEST CORPORATION, d/b/a/CENTURYLINK QC

Respondent.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,

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Complainant,

v.

CENTURYLINK OF COWICHE, INC. d/b/a CENTURYLINK,

Respondent.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,

Complainant,

v.

CENTURYTEL OF WASHINGTON, INC. d/b/a CENTURYLINK,

Respondent.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,

Complainant,

v.

CENTURYTEL OF WASHINGTON, INC. d/b/a CENTURYLINK,

Respondent.

DOCKET UT-190263 (Consolidated)

DOCKET UT-190264 (Consolidated)

DOCKET UT-190265 (Consolidated)

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,

Complainant,

DOCKET UT-190266 (Consolidated)

V.

UNITED TELEPHONE COMPANY OF THE NORTHWEST d/b/a CENTURYLINK.

Respondent.

PETITION TO INTERVENE

- Pursuant to WAC 480-07-355 (1), the Washington State Military

 Department, E911 Coordination Office (SECO) hereby petitions the

 Washington Utilities and Transportation Commission (UTC) for leave to
 intervene in the above-captioned dockets as an intervener. SECO requests
 intervention with full party status as described in WAC 480-07-340.
- 2 The business address of SECO is:

Adam R. Wasserman Washington State E911 Coordinator Washington Military Department MS: TA-20 Building 20 Camp Murray, WA 98430 (253) 512-7468 Adam.Wasserman@mil.wa.gov

3 SECO will be represented in this proceeding by Robert W. Ferguson,
Attorney General, and Dawn C. Cortez, Assistant Attorney General. All documents
relating to this proceeding should be served as follows:

Dawn C. Cortez
Assistant Attorney General
Transportation & Public Construction Division
7141 Cleanwater Drive SW
P.O. Box 40113
Olympia, WA 98504-0113
(360) 586-2436 Facsimile: (360) 586-6847

SECO is authorized by statute in accordance with RCW 38.52.520 for coordinating and facilitating the implementation and operation of enhanced 911 emergency communications systems throughout the state. It also procures and administers the PETITION TO INTERVENE - 2

contract for the State's Emergency Services IP network (ESInet).

- SECO is not statutorily responsible for gathering or entering into the State's Automatic Location Identification (ALI) database (ALI identifies the location of a wireline telephone with respect to building or residence address), or the commercial building Private Switch/Automatic Location Identification (PS/ALI) database (PS/ALI identifies where wireline telephones are located within a commercial building).
- However, the ESInet and the PS/ALI database are ultimately added to the ALI database and are used by the Public Safety Answering Points (PSAP) to direct first responders to the exact location from which a call was placed. As such, SECO and the counties it serves will be impacted by the ruling in this proceeding.
- For the foregoing reasons, SECO respectfully petitions the Commission for leave to intervene in this proceeding.

DATED this 8th day of May 2019.

ROBERT W. FERGUSON

Attorney General

DAWN C. CORTEZ, WSBA #19568

Assistant Attorney General

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Attorneys for Washington State Military

Department, E911 Coordination Office