

**BEFORE THE WASHINGTON  
UTILITIES AND TRANSPORTATION COMMISSION**

<p>WASHINGTON UTILITIES AND TRANSPORT COMMISSION,  Complainant,  v. QWEST CORPORATION, d/b/a CENTURYLINK QC  Respondent.</p>	<p>DOCKET UT-190262  <i>(Consolidated)</i></p>
<p>WASHINGTON UTILITIES AND TRANSPORT COMMISSION,  Complainant,  v. CENTURYLINK OF COWICHE, INC. d/b/a CENTURYLINK,  Respondent.</p>	<p>DOCKET UT-190263  <i>(Consolidated)</i></p>
<p>WASHINGTON UTILITIES AND TRANSPORT COMMISSION,  Complainant,  v. CENTURYTEL OF WASHINGTON, INC. d/b/a CENTURYLINK,  Respondent.</p>	<p>DOCKET UT-190264  <i>(Consolidated)</i></p>
<p>WASHINGTON UTILITIES AND TRANSPORT COMMISSION,  Complainant,  v. CENTURYTEL OF WASHINGTON, INC. d/b/a CENTURYLINK,  Respondent.</p>	<p>DOCKET UT-190265  <i>(Consolidated)</i></p>

<p>WASHINGTON UTILITIES AND TRANSPORT COMMISSION,  Complainant,  v. UNITED TELEPHONE COMPANY OF THE NORTHWEST d/b/a CENTURYLINK,  Respondent.</p>	<p>DOCKET UT-190266  (Consolidated)  PETITION TO INTERVENE</p>
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1. Pursuant to WAC 480-07-355(1), TeleCommunication Systems, Inc. (“TeleCommunication Systems”) hereby petitions the Washington Utilities and Transportation Commission (“UTC” or “Commission”) for leave to intervene in the above-captioned dockets as an intervener. TeleCommunication Systems requests intervention with full party status as set forth in WAC 480-07-340.

2. The business address for TeleCommunication Systems is:

TeleCommunication Systems, Inc.  
2401 Elliott Avenue  
Seattle, Washington 98121

3. TeleCommunication Systems will be represented in this matter by Susan C. Goldhar Ornstein. Ms. Ornstein is a full-time employee of TeleCommunication Systems. A separate notice of appearance will be filed with the Commission, as required by WAC 480-07-345(2).

4. Telecommunication Systems requests service of all documents at the following address:

Susan C. Goldhar Ornstein  
Senior Director, Legal & Regulatory Affairs  
Safety & Security Division  
Comtech Telecommunications Corp.  
275 West Street, Suite 200  
Annapolis, MD 21401  
susan.ornstein@comtechtel.com

5. Telecommunication Systems is contracted by the Washington State Military Department, E911 Coordination Office (“SECO”) to provide the State of Washington’s Emergency Service IP

network, which includes maintenance of the State's Automatic Location Identification (ALI) database. TeleCommunication Systems' contract with SECO does not impose any responsibility on TeleCommunication Systems to manage the commercial Private Switch/Automatic Location Identification ("PS/ALI") database.

6. As the PS/ALI database is incorporated into the ALI database and the ESInet to provide the correct dispatchable location information to public safety answering points ("PSAPs"), TeleCommunication Systems will be impacted by the ruling in this proceeding.

7. WHEREFORE, for the foregoing reason, TeleCommunication Systems respectfully petitions the Commission for leave to intervene in this proceeding.

Dated this 10th day of May 2019.

Respectfully submitted,

/s/ Susan C. Goldhar Ornstein  
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