

November 8, 2001

Ms. Carole J. Washburn, Executive Secretary
Washington Utilities and
Transportation Commission
1300 S. Evergreen Park Drive SW
P.O. Box 47250
Olympia, Washington 98504-7250

Dear Ms. Washburn:

Subject: **VERIZON SUPPLEMENTAL COMMENTS – UT-990146–WAC
480-120-340 - Enhanced 9-1-1 (E911) OBLIGATIONS OF
LOCAL EXCHANGE COMPANIES**

Verizon Northwest Incorporated submits the following supplemental comments on the above referenced rule.

During the October 19, 2001 workshop, Mr. Bob Oenning, on behalf of the State Military Department, presented proposed additions to WAC 480-120-340. Verizon is opposed to the proposed language. With regard to proposed 480-120-340(1)(b), for most customers the PSAP database contains the necessary information to determine where to send help in an emergency. However, when the end user is using a PBX, the LEC typically does not have specific data on the individual stations attached to the PBX. It is the responsibility of the end user to supply the data. Verizon agrees with the detailed comments on this point that were filed by Focal Communications Corporation of Washington on November 5, 2001.

In previously filed comments Verizon proposed to delete current WAC 480-120-340 entirely. However, Staff has explained that is it attempting to address CLEC and other carrier issues. After further review, Verizon proposes that subsection (1)(c) of Staff's proposed rule should be deleted entirely because it is already addressed in 480-120-138(5). Subsection (2) should be clarified as follows to apply to single line service only:

Carole Washburn, Executive Secretary
November 8, 2001
Page Two

480-120-340 (2) LECs must supply, for single line service, to the database of the E911 system customer information in a nationally accepted format with that data updated within twenty-four hours of any customer information changes.

Verizon appreciates the Commission taking into consideration these supplemental comments.

Please direct any questions to Joan Gage at 425-261-5238.

Very truly yours,

Lida C. Tong
Director – Regulatory & Governmental Affairs

j:eagroup\joan\jg32.doc