



*Washington State Chapter*  
**ASSOCIATION OF PUBLIC-SAFETY COMMUNICATIONS OFFICIALS INTERNATIONAL, INC.**

To: Washington Utilities & Transportation Committee

From: Mark Morgan, President - WA Chapter of APCO

Date: February 4, 2005

Re: Docket # UT-041629

UTC Subject: E911 obligations of local exchange companies and amendment of WAC 480-120-450 to establish a uniform demarcation point in the E9-1-1 network for carrier cost recovery.

Comments:

WA APCO supports the amendment to WAC 480-120-450, creating a uniform demarcation point in the E9-1-1 network, thus establishing a method of cost allocation between local exchange carriers and the PSAP that has parity with the wireless carriers. As new technologies emerge that provide access to 9-1-1 systems, it is critical to have a clearly identified point of demarcation for cost allocations associated with cost recovery.

A change to WAC 480-120-450 would also assist in stabilizing 9-1-1 operational costs associated with connectivity funding. Revenues from wireline taxes are leveling out and anticipated to decrease in the near future. VoIP currently does not offer the same level of financial support we receive from wireless and wireline tax revenue. A clear line of demarcation for all 9-1-1 service providers would greatly assist counties in planning for future costs and ensuring funding is available for the connectivity from the selective router to the PSAP.

The public-safety community thanks you for considering our input regarding this important issue.

CC: WA APCO Executive Committee