



King County

E-911 Program Office

Office of Emergency Management
Department of Executive Services
7300 Perimeter Road South, Room 128
Seattle, WA 98108-3848
(206)296-3910

January 23, 2002

Via Electronic Mail

Ms. Carole J. Washburn
Executive Secretary
Washington Utilities and Transportation Commission
1300 S. Evergreen Park Drive S.W.
Olympia, WA 98504-7250

RE: Rulemaking Docket No. UT-990146

Dear Ms. Washburn:

Pursuant to the Notice of Opportunity to File Written Comments and to Propose Alternative Rule Language, dated January 8, 2002, the King County Enhanced 911 Program Office provides the following comments on the Washington Utilities and Transportation Commission Staff's discussion draft of an alternative rule to WAC 480-120-340 and 480-120-341. In general we are in agreement with the proposed language, but suggest some minor additions which will improve the quality of 911 service delivered to the public.

I. INTRODUCTION

Our concerns are related to the maintenance of the 911 data bases. These include: the Master Street Address Guide (MSAG), which is a data base of street names and address ranges within their associated communities defining emergency service zones for 911 purposes; and the data base of actual subscriber names, addresses, and associated information which display at the Public Safety Answering Points (PSAPs) when a subscriber calls 9-1-1. The maintenance of these data bases is critical to the functioning of the E911 system. Errors in the information contained in these data bases could cause the misrouting of 9-1-1 calls and/or the display of incorrect address information at the PSAPs, resulting in the delay of emergency response to the caller.

II. DISCUSSION

The Qwest, Verizon, and Century Telephone 911 tariffs address this issue, but there are no 911 data base maintenance requirements for CLECs. The Qwest 911 tariff requires that routine MSAG changes on Qwest controlled files be processed within one business day from the time of receipt. The Verizon and Century Telephone 911 tariffs require MSAG updates to be processed within two business days. As the PSAPs notice data base errors when they receive a 911 call which contains errors in the displayed information or is misrouted to an incorrect PSAP, these errors are reported by the county 911 data base coordinators to their E911 service provider, which in King County's case is Qwest. The Qwest 911 tariff requires that these data base errors be resolved within five business days of receipt. There are no specific provisions in the Verizon and Century Telephone 911 tariffs for resolving data base errors reported by the PSAPs.

Our experience has been that this process works well for the Qwest records in the 911 data base, but not for the records of subscribers of other LECs. Data base or routing errors associated with Qwest subscribers are quickly resolved and corrected in the data bases, as is required by their 911 tariff. Errors on records belonging to other LECs, including the CLECs, are sent to the responsible LEC for resolution multiple times with no response. It is not unusual to wait several months for a correction, and in some cases, we have waited for two years for a record to be corrected. This seriously jeopardizes the accuracy of the 911 data bases, and the safety of the citizens represented by the incorrect records.

III. SUGGESTED ADDITIONS

It is our assertion that all LECs who have subscribers in the state should be required to maintain their 911 data bases in a timely manner to ensure that 911 calls from their subscribers route to the correct PSAP and display the correct information.

Specifically, we propose that a subsection be added as 480-120-340, 2, (d), which states:

“All LECS must process routine changes to station location information in the E911 data base for their customers within one business day from time of receipt. An exception will be allowed for special large changes.”

We also propose that a subsection be added as 480-12-340, 2, (e), which states:

“E911 data base errors and inquiries, including selective routing errors, reported by county E911 data base coordinators or public safety answering points (PSAPs) must be resolved within five business days of receipt.”

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In addition, we propose that a subsection be added to 480-120-341 which states:

“All LECS must provide an E911 data base maintenance contact who is available during business day hours to the county E911 data base coordinators in those counties in which they provide service.”

IV. CONCLUSION

The addition of the above language would ensure that all subscribers, regardless of which LEC provides their service, have accurate information in the 911 data bases which will route their 911 call to the correct PSAP and display their correct information.

We appreciate the opportunity to comment on the proposed rule. If you have any questions about these comments, please contact me at (206)296-3911.

Sincerely,



Marlys R. Davis
E-911 Program Manager