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January 22, 2002

Via Electronic and First Class Mail

Ms. Carole J. Washburn
Executive Secretary
Washington Utilities & Transportation Commission
1300 S. Evergreen Park Drive SW
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 Washington State Enhanced 911 Program of the Washington Military Department (E911 Program) provides the following comments on the Washington Utilities and Transportation Commission Staff's ("Staff") discussion draft of an alternative rule to WAC 480-120-340. In general we are in agreement with the proposed language but are proposing some minor changes to assure clarity.

I. INTRODUCTION

The E911 Program appreciates Staff's efforts to propose a rule revision that recognizes the changes in the telephone marketplace which impact how carriers interact to assure that enhanced 911 (E911) service is viable into the future. Enhanced 911 service was first initiated in Washington State in the mid 1980s with Referendum 42 in 1991 requiring that counties implement E911 statewide by 1999. Enhanced 911 services rely on Local Exchange Carriers to provide both connection to the E911 systems for call processing and for those carriers to update customer data on a timely basis to assure that when 911 is dialed the call is routed to the correct Public Safety Answering Point (PSAP) with correct customer address information. The need for changes in the rules defining the relationships that support E911 is most evident in the

requirement for carriers to make provisions for private telephone systems (PBX) to pass information to the E911 system that permits station location to be displayed at the PSAP. A small portion of the owners/operators of these systems are required to provide an interface to E911, but a large

number of others have voluntarily done so even when very difficult to do so under the existing rules. Staff's efforts have taken a complex subject and simplified it into rules within which both LECs and E911 system managers should be able to operate. Washington State continues to be an acknowledged leader in providing E911 services with The Commission being one of the first regulatory groups n the nation to adopt rules providing for E911 services for both general subscribers and for complex multi-line customers.

II. DISCUSSION

The proposed rule segments the responsibilities for service into two distinct categories; requirements applying to all LECs to provide connection to the E911 system to service their single line, pay phone line, and multi-line customers to deliver enhanced 911 features, and requirements specific to those LECs that provide E911 call processing and data management.

The requirement for all LECs includes the ability to dial 9-1-1 and have the "call and the caller's station phone number transmitted to the E911 selective router serving the location of the point of presence for that line." For single line customers this is the expected service level when 9-1-1 is dialed with the additional expectation that the address displayed at the PSAP will be the correct address where the phone is in use. PBX users will not receive this same level of service because the phone number transmitted with a call from trunked systems identifies only the location of the LEC interface to the PBX. Most current model PBXs are capable of transmitting specific phone numbers to identify station locations and owners of large PBXs serving multiple locations generally are diligent to equip their systems to provide the correct location, when the LEC provides a workable interface. A requirement that assures that all LECs provide customers a capability to transmit a phone number through the Public Switched Telephone Network (PSTN), either directly or indirectly, to the E911 selective routing switch acknowledges the need for this capability while permitting LECs to employ that capability in an appropriately competitive form. A suggested change to the rule discussed below clarifies that for single line customers and PBX customers not utilizing the capability to transmit location specific phone numbers the LEC will transmit a phone number and maintain a data record to generate the address when 911 is dialed.

The requirements specific to those LECs that provide E911 call processing and E911 data management are that those services be offered under a tariff, and that those LECs provide access for all customers to be able to manage the records in the Data Base Management System (DBMS). LECs providing E911 call routing and data base services have traditionally provided access to the DBMS for other LECs and for their own customers. The addition of the requirement to provide access to the E911 DBMS for all customers recognizes the capability of many PBX owners to manage the data related to the location of telephones on their systems but does not preclude LECs providing services that include DBMS update capability.

III. SUGGESTED CLARIFICATIONS

TRACER suggests that the term "phone number" be changed to a term more specific to the functional as the number transmitted to the E911 system that permits call routing, location data retrieval and callback if necessary. TRACER is correct that for PBX connections to E911 the term "station phone number" may be confusing since the actual station designation may not be a dialable phone number, or in some systems may not even look like a phone number. It is suggested that this number be referred to as an emergency location identification number with the following definition:

> "Emergency Location Identification Number" (ELIN) means a telephone number that is used to route the call to a PSAP and is used to retrieve the ALI for the PSAP.

TRACER also suggests that additional clarity is needed to avoid confusion concerning what location is associated with a particular number that is transmitted to the E911 system. It is suggested that for PBXs this location designation be called an emergency response location with the following definition:

> "Emergency Response Location (ERL)": means a location to which a 911 emergency response team may be dispatched.

These two changes will clarify the language by utilizing terms that are included in recommendations for PBX legislation developed by the National Emergency Number Association.

Consideration should be given to organizing the provisions to even further clarify the distinctions of what are responsibilities for all LECs and the distinct responsibilities for those LECs who provide E911 call routing and data management services.

IV. RECOMMENDED ADDITION

The rules do not make it clear that one of the obligations of all LECs is to update the DBMS on a timely basis. The standard practice today is for customer record changes to be posted to the DBMS within 24 hours of posting to the LEC data systems. It is also essential that records which cannot be posted to the DBMS due to data errors found in the DBMS pre-posting record audits be corrected with minimal delay. It is proposed that the following language be added to the requirements for all LECs to assure that the DBMS records are maintained in a timely manner:

> (d) For single line services, payphone lines and PBX main station lines the LEC shall transmit updated location information records to the DBMS within 24 hours of those records being posted to the company record systems. Records which do not post to the DBMS because of address errors shall be corrected within two working days unless modifications are necessary to the audit tables of the master street address guide in which case they must be resubmitted within 24 hours of notification that the master street address guide has been updated.

V. SUMMARY

The above suggestions for additional clarification are intended to enhance a set of proposed rules that take a giant step toward recognizing that all Local Exchange Carriers have an obligation to assure that their systems permit enhanced 911 feature functionality. E911 not only is the anticipated level of service expected by the public, it is the service level called for in the Federal Communications Commission definition of basic services that should be available to all customers. LECs have a tradition of providing E911 service in Washington State, even when changes in network operations such as number portability challenge some of the basic technical structure that is the foundation for E911 functionality. These rules take a major step toward recognizing that in a competitive environment all LECs have a set of E911 service obligations. The rules also provide for those LECs who chose to provide the call and data management services for E911 a clear direction for service implementation to assure that all parties who desire to connect their phone systems to E911 will be able to provide the anticipated level of service.

The Enhanced 911 Program of the Washington Military Department appreciates the opportunity to comment on the proposed rule. We look forward to working with the Commission on this and other future rules that will help assure that we will achieve our vision for the residents of Washington to have the best E911 access to emergency services in the world.

Sincerely,

Robert G. Oenning
Washington E911 Administrator

Cc. Bob Shirley, Washington Utilities and Transportation Commission