

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION  
COMMISSION

In the Matter of : ) DOCKET NO. UT- 990146  
Revising Rules- )  
Telecommunications Companies )  
Chapter 480-120 WAC )  
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**COMMENTS OF QWEST CORPORATION**

Qwest Corporation (Qwest) herein files comments concerning proposed amendments to WAC 480-120-340. Qwest will provide its comments in the same order as the proposed amendments:

**Paragraph (1) (b) - Multi-line Customers**

As currently written, the LEC will not be able to comply with the new draft language pertaining to multi-line customers. As noted in comments filed by TRACER<sup>1</sup>, unless multi-line customers generate and forward identifying numbers associated with stations located behind the customer's PBX switch, the LEC will be unable to identify the station location. Limitations may also apply in situations where customers request multi-line hunt groups. The LEC's switch may only recognize the location of the lead number in the hunt group. Therefore, if a customer places

an outgoing call from a line within the multi-line hunt group, the location of the lead number may be provided. Qwest therefore supports TRACER's recommended language<sup>2</sup>, with the following change:

*(1)(b) For multi-line customers, the ability for customers to dial 911 with the call and caller's station identification number transmitted to the E911 selective router serving the location of the caller's station, where the **LEC switch, PBX, or auxiliary equipment** generates and forwards appropriate number identification information for the station.*

Paragraph (1)(c) - Pay phones

Qwest finds the draft language in subsection (1)(c) inappropriate for several reasons. First, by including this language under subsection (1), the rule appears to apply to LEC provided pay phones only. If a 911 rule for pay phones is intended to apply to all pay phone providers, which Qwest assumes is Staff's intent, then the 911 pay phone rule should more appropriately be written into WAC 480-120-138, *Pay phone service providers (PSPs)*.

Qwest will now comment on the draft language as presented in subsection (1)(c). Qwest understands the desire to accurately identify where a pay phone box is located; however, as currently written, the LEC will not be able to comply with the draft language. The first issue pertains to the requirement that the pay phone address be displayed for the PSAP. The difficulty with this requirement is two-fold. First, many pay phones are not located at an addressable location. (e.g. public parks, rest stops, etc.). To meet this requirement, the pay phone would need a valid jurisdictionally approved address. It has been Qwest's experience that most jurisdictions do not address pay phone locations.

The second issue concerns the point of demarcation for the pay phone line provided by the LEC and the service provided by the pay phone provider. The LEC provided service ends at the point of demarcation. The LEC may provide a telephone line to a building with a

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<sup>1</sup> TRACER, January 10, 2002 at 2.

<sup>2</sup> Id.

demarcation point address, but then the pay phone vendor may take the line from the demarcation point and place the pay phone box at a different location. The pay phone vendor, not the LEC, is responsible for service on the vendor's side of the demarcation point, which includes the location of the pay phone instrument. Therefore, the LEC records would be limited to providing the location of the point of demarcation. Qwest offers the following suggested language as it relates to Paragraph (1) concerning LEC responsibilities:

*(1)(c) For pay phones, **with jurisdictionally approved addresses**, the capability for the address **of the point of demarcation** to be displayed to the public safety answering point (PSAP).*

(2) (a) and (b) Database Management

Qwest recommends the following changes to the draft language:

*(2)(a) LECs that **make available** E911 data base management, whether directly or through contract, must provide to all PBX owners or their agents a simple, internet-based, **or a secure dial up access method for the PBX owner** to maintain station location information in the E911 database. The **method** must use a generally accepted national format for customer record information. **Methods for maintaining station location information that are not internet-based may be offered in addition to the required internet-based method.***

*(2)(b) LECs that **make available** E911 data base management services to other LECs, whether directly or through contract, must **make available to such LECs** a simple, internet-based or direct data link method for the subscribing LEC to maintain station location information for their non-PBX customers. **Methods for maintaining station location information that are not internet-based may be offered in addition to the required internet-based method.***

Qwest suggests substituting the word "provides" with "make available", since LECs may not be providing the data base method directly, but rather making data base management available through another vendor. Qwest has inserted language to clarify the in (2)(a), the PBX owner is maintaining the station location information, and in (2)(b), the LEC providing local service to its end users is responsible for maintaining station location for its non-PBX customers. The addition of "secure dial up access method" or "direct data link" provides additional options to the internet based method.

(2)(c) Database Management - Pay phones

Qwest recommends the following changes, consistent with the discussion above concerning subsection (1) (c).

*(2)(c) LECs that provide pay phone access lines must maintain **demarcation location information** for those access lines using a method required by subsection (b) on this subsection.*

(3) Tariffs and Price Lists

Qwest offers the following revision to the draft language:

*(3) LECs wishing to provide E911 services including **selective routing and transmission of the call to a PSAP must file tariffs or price lists, whichever applies, for E911 services.***"

Qwest has deleted "data base management" from the draft language. The LEC is not required to tariff or price list data base management service because it is not a telecommunications service. Qwest has also deleted reference to "cost studies" and "terms".

Qwest believes that the recently adopted commission rules for tariffs and price lists adequately address cost support and terms.