

January 23, 2002

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 COMMENTS – UT-990146–Chapter 480-120 WAC -  
Enhanced 9-1-1 (E911) OBLIGATIONS OF LOCAL EXCHANGE  
COMPANIES**

Verizon Northwest Incorporated ("Verizon") submits these comments in response to the Commission's January 8, 2002 Notice of Opportunity to File Written Comments and to Propose Alternative Rule Language.

**WAC 480-120-340 Enhanced 9-1-1 (E911) obligations of local exchange companies.**

Verizon is opposed to the new proposed language "...selective router serving the location of the point of presence..." in draft subsections (1)(a)-(c) for several reasons. First, the term "point of presence" has not been defined. Second, the call can only be sent to the selective router that is connected to the phone number involved. For example, an Everett foreign exchange phone number serving a Seattle address cannot (at present) be sent to the Seattle selective router. It can only be sent to the Everett selective router. Verizon proposes to maintain the August 2001 draft language with a few minor changes as follows:

(1) Local exchange companies (LECs) must provide enhanced 91-1(E911) services including:

(a) For single line service, the ability for customers to dial 911 with the ~~call and~~ caller's phone number transmitted to the E911 system prompting the E911 system to display the service address associated with the caller's phone number serving the location of the point of presence for that line;

(b) For multi-line customers, the capability to identify the location of individual telephone stations at PBXs or similar equipment served by E911 service, where the PBX or similar equipment generates and forwards appropriate number identification information;

(c) For LEC pay phones, at minimum, the capability for the demarcation address associated with the caller's phone number to be displayed to the public safety answering point (PSAP). ~~The address must be that of the phone instrument if it is different from the public access line demarcation point. The caller's phone number must be that of the pay phone.~~

With regard to the new proposed language in draft subsections (2)(a)-(c), Verizon is opposed to being required to provide an "internet-based" method to maintain station location information in the E911 database. Verizon does not utilize an internet-based method for security reasons. The company uses mainframe to mainframe transmissions or dial-up/gateway systems. It would be administratively burdensome and extremely costly to change the method of maintaining information in the E911 database. Therefore, Verizon proposes the following language:

~~(2)(a) LECs that provide E911 data base management, whether directly or through contract, must provide to all their PBX owners or their agents an~~ electronic simple, internet-based method to maintain station location information in the E911 database. The method ~~must~~ should use a generally accepted national format for customer record information.

(b) LECs that provide E911 database management, whether directly or through contract, must provide all other LECs an electronic simple, internet-based method 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. The method~~ should use a generally accepted national format for customer record information.

~~(c) LECs that provide pay phone access lines must maintain station location information for those access lines using a method required by subsection (b) of this subsection.~~

Verizon would also like to stress that the LEC retains ownership of its numbers being utilized by its PBX customers. Therefore, the LEC that is not acting as a data base manager reserves the right to require its PBX customers to send its E911 address data to that LEC for processing with the rest of its records. To do otherwise would not only undermine the LEC's relationship with its PBX customers, but would also cause two companies (the LEC and the PBX owners) to send the E911 data base manager address information for the same phone number. Unless coordinated, the LEC would send the demarcation address and the PBX owner would send the station specific information. Again, the LEC that owns the phone number retains the right to perform this coordination.

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Verizon appreciates the Commission taking into consideration these comments.

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

Very truly yours,

Allan T. Thoms  
Vice President – Public Policy & External Affairs