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TO: Washington Utilities & Transportation Committee  
FROM: Tom Shaughnessy, Director  
DATE: February 4, 2005  
SUBJECT: Docket #UT-041629

RECEIVED  
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ISLAND COUNTY COMMUNICATIONS CENTER

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

**Comments:** Island County supports the amendment to WAC 480-120-450, creating a uniform demarcation point in the E911 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 911 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 911 operational costs associated with connectivity funding. Revenues from wireline taxes are leveling out and are 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 911 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.

cc: I-COM Board of Directors