



# YAKIMA COUNTY

## 9-1-1

200 South 3<sup>RD</sup> Street  
Yakima, Washington 98901

February 11, 2005

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

Re: Docket # UT-041629

**UTC Subject:** Rulemaking to consider amendment of WAC 480-120-450, Enhanced 9-1-1, (E911), obligation of Local Exchange Carriers.

### **Comments:**

Yakima County supports the amendment to WAC 480-120-450, creating a uniform demarcation point in the E9-1-1 network, thus establishing a method of cost allocation between local exchange carriers and the PSAP that has parity with all current and future telecommunication providers that have access to the 9-1-1 emergency system. It is critical to have a clearly identified point of demarcation for cost allocations associated with cost recovery so as new known and unknown technologies emerge that provide access to 9-1-1 systems, all parties have a clear understanding and knowledge of what their responsibilities and costs shall be.

By having a clearly defined demarcation for the regulated carriers it creates a standard, competitively fair and defensible model that can be applied to any telecommunications providers, regardless of the technology used, and should remove or minimize the lengthy and complex negotiations and legal actions that can delay the implementation of this critical service, such as occurred with the cellular technology.

A change to WAC 480-120-450 would also assist in stabilizing 9-1-1 operational costs associated with connectivity funding. Revenues from wireline taxes are leveling out and 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 9-1-1 service providers would greatly assist counties in planning for future costs and ensuring funding is available to keep this critical service functioning.

Wayne F. Wantland, Director  
Yakima County 911  
200 S. 3<sup>rd</sup> Street  
Yakima, WA 98901