

**Exhibit 1 to AT&T Michigan's  
Comments on Draft MLTS Rules**

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DEPARTMENT OF ENERGY, LABOR, AND ECONOMIC GROWTH

PUBLIC SERVICE COMMISSION

TELECOMMUNICATIONS SERVICES

(By authority conferred on the public service commission by sections 405 and 413 of 1986 PA 32 as revised, MCL 484.1405 and 484.1413)

PART 1. GENERAL PROVISIONS

R 484.XXX Applicability.

Rule 1.

(1) These rules apply to service users, as defined by the Emergency 9-1-1 Services Enabling Act, PA 32 of 1986 as revised. Nothing herein shall create any additional obligations for service suppliers.

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(2) All provisions of this rule shall also apply to facilities with multiple lodging or dwelling units with a total common area and total residential area that is within the defined square footage limitations of this rule, and the Emergency Response Location shall include the specific room number, suite number, or other unique location information that identifies where the caller is located.

(3) Compliance with the provisions of this rule shall be mandatory no later than December 31, 2011.

(4) Compliance with the provisions of this rule shall also be mandatory for any new multiple dial tone access point communications systems that is installed after the effective date of this rule.

Deleted: as defined in Public Act 32 of 1986 (as amended)

History: 2008 MR XX, Eff. Dec 31, 2011

R 484.XXX Definitions.

Rule 2. (1) As used in these rules:

(a) "Act" means the Emergency 9-1-1 Services Enabling Act, P.A. 32 of 1986, as revised P.A. 164 of 2007 and PA 379 of 2008

(b) "Automatic Location Information" (ALI): means a 9-1-1 service feature provided by the service supplier that automatically provides the name and service address or, for a CMRS service supplier, the location associated with the calling party's telephone number as identified by automatic number identification to a 9-1-1 public safety answering point.

Deleted: Automatic display at the PSAP of the caller's telephone number, address/location of the telephone and supplementary emergency services information.

(c) "Communication Service" means a service capable of accessing, connecting with, or interfacing with a 9-1-1 system, exclusively through the numerals 9-1-1, by dialing, initializing, or otherwise activating the 9-1-1 system through the numbers 9-1-1 by means

of a local telephone device, cellular telephone device, wireless communications device, interconnected voice over the internet device, or any other means.

(d) “Emergency Response Location” (ERL) provides a minimum of the building, floor location of the caller, and specific area identification of the caller’s location that is not larger than 7,000 square feet. (HMB)

(e) “Master Street Address Guide” (MSAG): means a perpetual database that contains information continuously provided by a service district that defines the geographic area of the service district, and includes an alphabetical list of street names, the range of address numbers on each street, the names of each community, in the service district, the emergency service zone of each service user, and the primary service answering point identification codes.

(f) “Multiline Telephone System Operator” means the entity that either owns, or leases/rents from a third party, and operates a MLTS through which a caller/person may place a 9-1-1 call through the public switched network. [determine whether this definition is needed or not]

(g) “Multiline Telephone System” or (MLTS)÷ means a system comprised of common control unit(s), telephone sets, and control hardware and software. This includes network and premises based systems, i.e., Centrex and PBX, Hybrid and Key Telephone Systems owned or leased by governmental agencies and nonprofit entities, as well as for profit businesses. [determine whether this definition is needed or not]

(h) “Public Safety Answering Point” (PSAP): means a communications facility operated or answered on a 24-hour basis assigned responsibility by a public agency or county to receive 9-1-1 calls and to dispatch public safety response services, as appropriate, by the direct dispatch method, relay method, or transfer method. It is the first point of reception by a public safety agency of a 9-1-1 call and serves the jurisdictions in which it is located and other participating jurisdictions, if any.

(i) “Public Switched Telephone Network (PSTN): Worldwide voice telephone network accessible to all those with telephones and access privileges (Newton’s)

(j) “Service Supplier” means a person providing a communications service to a service user in this state.

(k) “Service User” means a person receiving a communications service.

(l) “Specific Location” (State 9-1-1 Committee subcommittee) A room or unit number, or room name, or equivalent designation of a portion of a structure or building to which a 9-1-1 emergency response team may be dispatched and the caller quickly located. [determine whether this definition is needed or not]

(m) “Tariff” means the rate approved by the public service commission for 9-1-1 service provided by a particular service supplier. Tariff does not include a rate of a commercial mobile radio service by a particular supplier. [determine whether this definition is needed or not]

(n) “Voice over Internet Protocol” (VoIP) a technology for communicating using “Internet Protocol” instead of traditional analog systems. IP-enabled voice service (also called “interconnected VoIP”) is a service that enables real-time, two-way voice communications; requires a broadband connection from the user’s location; requires IP-compatible customer premises equipment; and permits users generally to receive calls that originate on the public switched telephone network (PSTN) and to terminate calls on the PSTN (FCC 08-249)

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- Deleted: “Multiline Telephone Operator” (FCC 03-290 FN 177) the owners and operators of multiline systems such as businesses, hospitals, and universities.
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- Deleted: “Multiline Telephone System” (MLTS): A private branch exchange (PBX), a Centrex telephone system, a key telephone system, and a hybrid telephone system.
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- Formatted: Font: 12 pt
- Formatted: Don't adjust space between Latin and Asian text, Don't adjust space between Asian text and numbers
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History: 2007 MR XX, Eff. December 31, 2011

PART 2. RECORDS, REPORTS, AND TARIFFS

R 484.XXX Availability of Records

History: 2007 MR XX, Eff. December 31, 2011

Deleted: Rule 3. A service supplier shall provide access to the 9-1-1 database to the service user as needed to comply with these rules.

PART 3. SERVICE USER RESPONSIBILITIES

Rule 4. (1) Any service user as defined in P.A. 32 of 1986 (as amended) that installs or operates a private business switch or multiple dial tone access point communications system (needs definition), or provides telecommunications facilities or services, including Voice over Internet Protocol (VoIP), shall assure that the system is connected to the public switched telephone network in a manner that calls to 9-1-1 result in accurate automatic number and location identification that can be verified in the 9-1-1 Master Street Address Guide.

(2) (a) For buildings having their own street address and containing workspace of 40,000 square feet or less, all located on a single floor and on a single contiguous property, location identification shall include the building's street address.

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(b) For buildings having their own street address and containing workspace of more than 40,000 square feet, location identification shall include the building's street address and the Emergency Response Location (ERL).

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(c) Separate buildings containing workspace of 40,000 square feet or less, all located on a single floor and on a single contiguous property, and having a common public street address shall have a distinct location identification for each building in addition to the street address.

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(d) Separate buildings containing workspace between 7,000 square feet and 40,000 square feet on multiple floors shall provide location identification that shall include the building's street address and Emergency Response Location.

History: 2007 MR XX, Eff. December 31, 2011

PART 5. REPAIR AND INSTALLATION  
(Does this apply? Please provide draft rules.)

History: 2007 MR XX, Eff. December 31, 2011

Deleted: PART 4. SERVICE PROVIDER RESPONSIBILITIES¶  
(Does this apply? Please provide draft rules.)¶  
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History: 2007 MR XX, Eff. December 31, 2011¶

PART 6. MONITORING  
(Does this apply? Please provide draft rules.)

History: 2007 MR XX, Eff. December 31, 2011

PART 7. WAIVERS

R 484.XXX Waivers

Rule XX. (1) No requests for waivers for the December 31, 2011 due date will be accepted by the Commission.

History: 2007 MR XX, Eff. December 31, 2011

PART 8. EXCEPTIONS

R 484.XXX Exceptions

Rule XX. (1) Service users of a building containing workspace of more than 40,000 square feet may request an exception, from the commission, from the multiple location identification requirements if the building maintains, on a 24-hour basis, alternative and adequate means of signaling and responding to emergencies including, but not limited to, a communications system that provides the physical location of 9-1-1 calls from within the building.

(2) Service users of a building containing workspace of more than 40,000 square feet may request an exception, from the commission, if the building maintains, at all times, alternative and adequate means of signaling and responding to emergencies, including a communication system that provides the location of a 9-1-1 call coming from within the building, and the building is serviced with its own appropriate medical, fire, and security personnel.

(3) Service users of a building not serviced by enhanced 9-1-1 service may request an exception from the Commission.

(4) Service users of a building that cannot receive telecommunications services enabling ERL to be transmitted may request an exception from the commission.

(5) Service users that have, prior to January 1, 2010, implemented a capability at a particular building to provide location information to PSAPs may request an exemption from the Commission for that building.

(6) A request for exception is automatically approved unless Commission staff notifies the requesting service user within 10 days of receiving the request for exception that the request is not automatically approved.

(7) If a request is not automatically approved, the Commission shall grant an exception for the reasons set forth in subparts (1) – (5) upon a showing of good cause.

History: 2007 MR XX, Eff. December 31, 2011