

EXHIBIT 1
AT&T MICHIGAN
REPLY COMMENTS
SEPTEMBER 10, 2009

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 user 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.

~~(2) Compliance with the provisions of this rule shall be mandatory no later than December 31, 2011.~~

~~(3) Compliance with the provisions of this rule shall also be mandatory for any new multiline telephone system that is installed after the effective date of this rule.~~

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 Identification" or ALI means a 9-1-1 service feature that automatically provides the name and service 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.

(c) "Automatic Number Identification or "ANI" means a 9-1-1 service feature provided by the service supplier that automatically provides the calling party's telephone number to a 9-1-1 public safety answering point.

(d) "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

Deleted: (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 identifies where the caller is located.

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Deleted: (911 Law) The automatic display at the PSAP of the caller's telephone number, the address/location of the telephone and supplementary emergency services information of the location from which a call originates. (NENA)

Deleted: (911 Law) Telephone number associated with the access line from which a call originates. (NENA)

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

(e) "Emergency Response Location" or (ERL) means a location to which a 9-1-1 emergency response team may be dispatched. The location should be specific enough to provide a reasonable opportunity for the emergency response team to quickly locate a caller anywhere within it.

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(f) "Master Street Address Guide" or 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 street 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.

(h) "Multiline Telephone System" or (MLTS): means a system comprised of common control unit(s), telephone sets, and control hardware and software, regardless of the technology used. This includes network and premises based systems, e.g., Centrex and PBX, Hybrid, and Key Telephone Systems owned or leased by governmental agencies and nonprofit entities, as well as for profit businesses. (i) "Private Switch ALP" or PSALI means a service option which provides enhanced 9-1-1 features for telephone stations behind private switches (e.g., PBXs).

(j) "Public Safety Answering Point" or (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. (k) "Public Switched Telephone Network or (PSTN): means the network of equipment, lines, and controls assembled to establish communications paths between calling and called parties in North America.(NENA)(Verizon)

(l) "Service Supplier" means a person providing a communications service to a service user in this state.

(l) "Service User" means a person receiving a communications service.

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

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PART 3. SERVICE USER RESPONSIBILITIES

Rule 4. (1) Any service user that installs or operates a multiline telephone system shall assure that the system is connected to the public switched telephone network in a

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Deleted: (Verizon and NENA) (Replaced by AT&T) 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).

Deleted: (911 Law) A data base of street names and house number ranges within their associated communities defining Emergency Service Zones (ESZs) and their associated Emergency Service Numbers (ESNs) to enable proper routing of 9-1-1 calls. (NENA)

Deleted: (g) "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 may place a 9-1-1 call through the public switched network. [determine whether this definition is needed or not – AT&T]

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Deleted: (9-1-1 Law) Means a set of call takers authorized by a governing body and operating under common management which receives 9-1-1 calls and asynchronous event notifications for a defined geographic area and processes those calls and events according to a specified operational policy (Verizon) – 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 jurisdiction in which it is located and other participating jurisdictions, if any. (AT&T)

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Deleted: (m) "Specific Location" (State 9-1-1 Committee subcommittee) A room or unit number, or room number ... [1]

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Deleted: (o) "Voice over Internet Protocol (removed by Verizon – reinstated by AT&T) (VoIP) is ... [2]

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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.

(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).

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

(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.

(3) Facilities with multiple lodging or dwelling units with a total area (including residential and common areas) that is within the defined square footage limitations of this rule shall include the specific room number, suite number, or other unique location information identifies where the caller is located.

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

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PART 4. MONITORING

Rule 5. (1) Each service user is required to notify the Commission in writing no later than December 31, 2011 that it has installed the necessary equipment and software to comply with the requirements of Part 3.

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PART 7. WAIVERS

R 484.XXX Waivers

Rule 6. (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 7.

(1) Prior to the effective date of this rule a service user may request an exception for any of the reasons set forth in subpart 3 (a) – (f), below. Such a request must be received by the Commission in writing no later than September 1, 2011.

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(2) After the effective date of this rule, a service user establishing a multiline telephone system at a location may request an exception for any of the reasons set forth in subpart 3(a) – (f). Such a request must be received by the Commission in writing no later than 30 days prior to activation of the multiline telephone system.

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(3) A request for exception must be requested for each service location under one or more of the following conditions:

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(a) Service users of a building containing workspace of more than 40,000 square feet may request an exception 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.

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(b) Service users of a building containing workspace of more than 40,000 square feet may request an exception 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.

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

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(d) Service users of a building which cannot receive telecommunications service enabling ERL to be transmitted may request an exception.

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(e) Service users of a building served by a multiline telephone system that is not technically capable of enabling emergency response location information to be transmitted may request an exception.

(f) 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 for that building.

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(4) Requests for exceptions are automatically approved unless Commission staff notifies the requesting service user within 10 days of receiving a request for exception that the request is not automatically approved.

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(5) If a request is not automatically approved, the Commission shall grant an exception for the reasons set forth in subpart 3(a) – (f) upon a showing of good cause.

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(6) If the condition(s) as described in subpart 3(a) – (f) upon which the exception was granted no longer exists for a location, the service user must notify the Commission in writing.

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

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(m) “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 – AT&T]

(n) “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. (911 Law) (taken out by Verizon, put back in by AT&T with “determine whether this definition is needed or not.)

(o) “Voice over Internet Protocol (removed by Verizon – reinstated by AT&T) (VoIP) is 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) Reinstated by AT&T comments.