

**AT&T MICHIGAN’S JANUARY 22, 2010 COMMENTS TO STAFF’S  
THIRD INFORMAL REQUEST FOR COMMENTS ON PROPOSED RULES FOR 911  
MULTILINE TELEPHONE SYSTEMS**

Michigan Bell Telephone Company d/b/a AT&T Michigan (“AT&T Michigan”) hereby submits these informal Comments on Staff’s third draft of proposed rules for 911 Multiline Telephone Systems (“MLTS”). AT&T Michigan appreciates the extent to which Staff is carefully considering the comments of all interested parties. At this stage in the process, AT&T Michigan believes that it would be beneficial for the Staff to host a meeting on its proposed rules so that all interested parties could better understand the remaining issues.

AT&T Michigan recognizes that Staff has posed several questions in its latest draft, and has also left some blanks in the document that need to be filled in. AT&T Michigan is not addressing all of these issues at this point and believes they are better addressed after interested parties have had the opportunity to meet. In fact, AT&T Michigan is only addressing three brief points in these comments:

1. The definition of “Multiline Telephone System” should be flexible enough to include alternative technologies, such as VOIP. AT&T Michigan acknowledges that the Commission does not regulate VOIP services and is in no way advocating that the Commission attempt to assert such jurisdiction here. However, there are certain regulatory obligations that can, according to the FCC, apply to VOIP services – such as duty to provide access to E911 services and the duty to participate in local number portability. The Commission should not limit itself by drafting this proposed rule too narrowly.

In order to accomplish this, AT&T Michigan recommends that the definition of “Multiline Telephone System” be revised as follows:

e) “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. 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.

2. AT&T Michigan generally supports the changes to the section of the proposed rules dealing with “Service User Responsibilities”. This is the heart of the rules because it creates the obligation that the “service user” transmit the desired information to the emergency response team. It appears, however, that there should be a reference somewhere in this section to the “specific location”, i.e., the location to which an emergency response team may be dispatched. This could be added to the end of the revised section, as follows:

Rule 3. Any service user, as defined in P.A. 32 of 1986, as amended, that installs or operates a multiline telephone system shall assure that the system is connected to the 9-1-1 network in a manner that calls to primary PSAPs result in accurate ALI and ANI that can be verified in the 9-1-1 database and identify the specific location of the caller.

3. Finally, AT&T Michigan notes that it is unclear what language is included in the current version of the section on “Exceptions”. One version of this section of the rules contains five subparts; the other contains seven. This part of the rules probably needs the most work, but AT&T Michigan was unable to comment further without additional clarity about the language under consideration.

In summary, AT&T Michigan respectfully requests that Staff convene a meeting of interested parties to further discuss these rules and, in the meantime, further revise its proposed rules consistent with the recommendations herein.

Respectfully submitted,

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Dated: January 22, 2010