

**VERIZON COMMENTS REGARDING STAFF’S LATEST DRAFT RULES FOR
MULTILINE TELEPHONE SYSTEM (“MLTS”) 911 CALLS**

Thank you for the opportunity to review Staff’s draft revised proposed rules for Multiline Telephone System (“MLTS”) 9-1-1 calls sent to us on July 29, 2009 (“Latest Draft Rules”). These comments are submitted on behalf of Verizon North Inc., Contel of the South, Inc. d/b/a Verizon North Systems, and MCImetro Access Transmission Services LLC d/b/a Verizon Access Transmission Services (collectively “Verizon”).

Verizon is pleased to see that a number of its suggested revisions have been incorporated into the Staff’s latest draft rules. Notably, Staff has appropriately removed from its latest draft rules any provisions applying to service suppliers, which is consistent with Section 413 (4) of the Emergency 9-1-1 Services Enabling Act, PA 32 of 1986 (“Act”).¹ In addition, Verizon proposes the following additional revisions to the Staff’s latest draft rules.

PART 1 – GENERAL PROVISIONS

Rule 1 – Applicability:

In subsection (1) of Rule 1, Verizon does not object to AT&T’s proposed additional statement that “Nothing herein shall create any additional obligations for service suppliers”. However, if this statement is included in the next version of the proposed rules, then the definition for the term “service supplier” must be added back to Rule 2. Verizon suggests using the definition Staff proposed in its initial proposed draft rules issued to parties on May 19, 2009 (“Initial Draft Rules”), which is:

“Service supplier” means a person providing a communications service to a service user in this state.²

¹ Section 413(4) of the Act states: “The rules promulgated under this section do not apply to service suppliers.”

² Staff’s proposed definition for “service supplier” is the same definition as that contained in the Act.

Rule 2 – Definitions:

As suggested in Verizon’s initial comments dated June 9, 2009 (“Verizon Initial Comments”), any terms requiring a definition should follow the definition contained in the Act. If a term is not defined in the Act, then the definition contained in the National Emergency Numbering Association (“NENA”) Master Glossary of 9-1-1 Terminology (“NENA Definitions”)³ should be utilized.⁴ Moreover, Verizon agrees with AT&T that the definitions for the terms “Multiline Telephone System Operator” and “Tariff” should be removed from Rule 2 because these two terms are not referred to in the Staff’s Latest Draft Rules. For the same reason, the definition for “Voice Over Internet Protocol (VoIP)” should also be removed. The definitions for the terms “Multiline Telephone Systems or (MLTS)” and “Specific Location” should remain because these terms are utilized in the Staff’s Latest Draft Rules.⁵ Verizon’s Attachment 1 incorporates the necessary modifications, as explained above, to the various definitions contained in Rule 2.

PART 3 – SERVICE USER RESPONSIBILITIES

Rule 4- Service User Responsibilities

Verizon recommends removing the reference to the term “public switched network” in subsection (1) of Rule 4 because it is not necessary to explain how the call is routed to access 9-1-1. Verizon’s suggested revisions to the rule are noted below:

- (1) 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 **can route** ~~is connected to the public switched telephone network in a manner that~~ calls to 9-1-1 resulting in accurate automatic

³ See <http://www.nena.org/standards/technical/master-glossary>.

⁴ Although Verizon’s recommends utilizing the definitions contained in the Act if they exist, Verizon does not object to utilizing the NENA definitions as an alternative recommendation.

⁵ The term Multiline Telephone Systems or (MLTS) is noted in subsection (4) of Rule 1 and subsection (1) of Rule 4. The term “Specific Location” is used in (1) of Rule 5.

number and location identification that can be verified in the 9-1-1 Master Street Address Guide.

In its June 9, 2009 comments, Verizon recommended that the language “utilizing PSALI or other solutions” be added to subsections (2)(b) and (2)(d) of Rule 4 because it was more descriptive of the additional obligations that the Staff’s proposed rules would impose on service users. Therefore, Verizon believes this language should remain as part of subsections (2)(b) and (2)(d) of this rule as noted below.⁶

- (3) 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) **utilizing PSALI or other solutions.**
- (5) 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 **utilizing PSALI or other solutions.**

PART 8 - EXCEPTIONS

Verizon is pleased to see that Staff incorporated its suggested revisions to Rule 7. Verizon has also reviewed the new additions of subsection (5) proposed by AT&T and subsection (7) proposed by Staff and has no objection to these new revisions. However, Verizon again suggests a few additional modifications to Rule 7. First, Verizon recommends language should be added to address the time frame in which initial exceptions (those effective as of December 31, 2011) and subsequent exceptions (those effective after December 31, 2011) must be submitted to Staff for consideration. Verizon suggests a due date of September 1, 2011 for initial requests and thirty days prior to

⁶ Staff’s Latest Draft Rules appear to indicate that AT&T recommended to remove Verizon’s proposed language for subsections (2)(b) and (2)(d). However, AT&T’s reply comments provided to Staff on June 30, 2009 did not provide any specific comments to Rule 4. Rather AT&T stated that it was “...continuing its review of this proposed rule and has no comments at this time.” AT&T Reply Comments at 3.

occupancy for exceptions requested after December 31, 2011. Verizon also provides additional language that requires the service user to notify Staff in writing if the condition upon which the exception was granted changes subsequent to the December 31, 2011 and, therefore, no longer requires an exception to the rule. Verizon recommends the following proposed language be added to this section:

Rule 7. (1) A service user's request for an exception as described in subdivision (a) – (e) of subrule (3) of this rule that is effective December 31, 2011 must be received by the Commission's telecommunications division in writing no later than September 1, 2011.

(2) A service user's request for an exception as described in subdivision (a) – (e) for subrule (3) of this rule that is effective after December 31, 2011 must be received by the Commission's telecommunications division in writing no later than 30 days prior to occupancy.

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

(a) 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.

(b) 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 its own appropriate medical, fire, and security personnel.

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

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

(e) 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) 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.

(75) If a request is not automatically approved, the Commission shall grant an exception for the reasons set forth in **subdivision (a)-(e) of subrule parts (34) —(5)** upon a showing of good cause.

(6) If the condition(s) as described in subdivision (a) – (e) of subrule (3) upon which the exception was granted no longer exists for a service location, the service user must notify the Commission’s telecommunications division in writing within ten days of knowledge of the change that an exception is no longer required.

CONCLUSION

Verizon requests that Staff incorporate the additional revisions proposed by Verizon. Verizon has attached a redlined version of the Staff’s Latest Draft Rules, which contains the additional proposed changes that Verizon recommends.

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) 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.

(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 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. (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)~~

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

(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 of a local telephone device, cellular telephone device, wireless communications device, interconnected voice over the internet device, or any other means. ~~(911 Law)~~

(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. ~~(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).~~

~~DRAFT (2)~~

~~DRAFT (2)~~

(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. ~~(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)~~

~~(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]~~

~~(gh) “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. (NENA) [determine whether this definition is needed or not AT&T]~~

~~(hi) “Private Switch ALI” or PSALI means a service option which provides enhanced 9-1-1 features for telephone stations behind private switches (e.g., PBXs) (NENA)~~

~~(ij) “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 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. (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)~~

~~—(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)~~

(k) “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. ~~(911 Law)~~

(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.~~

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

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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 multiline telephone system shall assure that the system can route ~~is connected to the public switched telephone network in a manner that~~ calls to 9-1-1 resulting 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) **utilizing PSALI or other solutions.**

(Verizon) ~~(Removed “utilizing PSALI or other solutions” by AT&T)~~

(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.

(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 **utilizing PSALI or other solutions.** **(Verizon)** ~~(Removed “utilizing PSALI or other solutions” by AT&T)~~

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

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PART 4. MONITORING

Rule 5. (1) Service users are required to notify the Commission in writing no later than December 31, 2011 that the necessary equipments and software to provide specific location information of a 9-1-1 call has been installed.

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

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~~DRAFT (2)~~

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) A service user’s request for an exception as described in subdivision (a) – (e) of subrule (3) of this rule that is effective December 31, 2011 must be received by the Commission’s telecommunications division in writing no later than September 1, 2010

(2) A service user’s request for an exception as described in subdivision (a) – (e) for subrule (3) of this rule that is effective after December 31, 2011 must be received by

the Commission's telecommunications division in writing no later than 30 days prior to occupancy.

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

(a) 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.

(2b) 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 its own appropriate medical, fire, and security personnel.

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

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

(5e) 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.

(64) 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.

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

(6) If the condition(s) as described in subdivision (a) – (e) of subrule (3) upon which the exception was granted no longer exists for a service location, the service user must notify the Commission's telecommunications division in writing within ten days of knowledge of the change that an exception is no longer required.

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