

**VERIZON COMMENTS REGARDING OTHER PARTIES' COMMENTS ON
THE LATEST DRAFT RULES FOR MULTILINE TELEPHONE SYSTEM
("MLTS") 911 CALLS**

Thank you for the opportunity to review other parties' comments on the 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 impacted non-provider parties' have commented since the law impacts service users and not providers.¹ Verizon will comment on each party's comments individually.

COMMENTS OF ANDREWS UNIVERSITY

Andrews University proposes that these rules apply to service suppliers by replacing service suppliers with "database service provider" even though it is inconsistent with the enabling statute. In addition, Andrews University proposes that the rule increase the responsibility of a database service provider to warehouse the PSALI data for customers at tariffed rates. As stated by AT&T and Verizon, the legislation governing these rules creates no additional obligations for service suppliers. The service user, not the service supplier, must provide the identification of the Emergency Response Location ("ERL") to the responder. As a practical matter, it would not be appropriate to open the ALI databases to all MLTS operators. These databases are not designed with the necessary security or processes to have individual end users updating their own data. Moreover, the result urged by Andrews University is not necessary because there are

¹ Comments were submitted by Andrews University, Michigan State University ("MSU"), and the Michigan Department of Information Technology Financial Services Division ("DIT").

services already available to MLTS operators that provide the requested database functionality. Andrews University also claims that there may be discriminatory pricing to large users with 50 or more service users. This is incorrect. In fact, Verizon does not support discriminatory pricing for any services.

COMMENTS OF MICHIGAN STATE UNIVERSITY

Michigan State University (“MSU”) comments that “the proposed rules create a serious financial and operational burden.” MSU introduces the concept and language that service users of a building may request an exception from the Commission to transmit ERL. In some cases it may be in the public interest to do so. Where human occupancy and risk in a structure over 40,000 square feet is so minimal or well controlled, and based on cost/benefit analysis, the additional investment may not be warranted. For example, a large agricultural facility with MLTS over 40,000 square feet used to house sheep that has a separate street address may not be required to provide ERL beyond the street address due to the lack of risk or impact to human safety. An exception may also be appropriate for a self storage facility with MLTS over 40,000 square feet in which individuals store household goods. In such case, it might be reasonable not to provide ERL beyond the street address since access is controlled and risk is minimal. Verizon believes exceptions may be warranted as long as the exception is valid and in the public interest. The Commission should still be permitted to review and approve an exception if there is good cause and it should establish criteria of acceptable exceptions to expedite the processing of application. Any request should include support from the ETSC and include consideration of technical, economic, and operational conditions of the service user and any other public policy considerations.

COMMENTS OF MICHIGAN DEPARTMENT OF INFORMATION TECHNOLOGY

The Michigan Department of Information Technology (“DIT”) has provided several comments and a number of textual changes to the proposed rules. Several of the textual changes appear minor and Verizon focuses its comments on the more material proposed changes.

Comment on DOIT1: Verizon does not support specific criteria to eliminate certain owners.

Comment on DOIT2: Verizon believes DIT’s comment has merit. “Any” new multi-line telephone system referenced in Rule 4 of subparagraph (4) should be limited to those systems that are within the defined square footage limitations for an ERL.² To clarify this limitation, Verizon proposes the following modifications to subparagraph (4) of Rule 4:

(4) Compliance with the provisions of this rule shall also be mandatory for any new multi-line telephone system that **is within the defined spatial limitations for an Emergency Response Location and** is installed after the effective date of this rule.

Comment on DOIT3: Verizon disagrees with DIT that AT&T is not in a position to comment and Verizon supports all providers’ right to comment. In addition, Verizon disagrees that specific location and square footage references should be eliminated. DIT contradicts itself by suggesting that “within 600 square foot area” is relevant. The definition and use of the ERL, is sufficient to address the concerns raised by DIT.

Comment on DOIT4, DOIT5, DOIT6, and DOIT7: DIT introduces the definition of “Emergency Location Identification Number” (ELIN) and provides an explanation of

² See Verizon’s proposed revisions to the ERL definition noted below in the Other Verizon Comments”.

this new definition. Verizon does not support inclusion of this definition in the Latest Draft Rules since the definition is not used anywhere in the rules. In addition, there are a number of typos in the new definition.

Comment on DOIT8: Verizon does not support an exception based on DIT's comments and believes the exceptions previously published are adequate.

Comment on DOIT 10: Verizon does not support "authorized and approved" or similar language and believes Rule 7 (3) exception covers this issue. As noted above, Verizon does not support the inclusion of the term "ELIN" in the rules.

Comment on DOIT 11: Same comment as DOIT 10 above.

Comment on DOIT 12: Verizon believes the Commission has the necessary tools to ensure compliance and does not support DIT's suggestion.

Comment on DOIT 13 and DOIT 14: Verizon believes the rules adequately define acceptable exceptions notwithstanding its comments on MSU suggestions.

Comment on DOIT 15: Verizon does not support requirements on carriers or 911 districts since this change in the law and the rules do not apply to carriers.

OTHER VERIZON COMMENTS

As noted in Verizon's previous comments concerning the Staff's proposed rules, Verizon's position regarding the definitions contained in the proposed rules is that any terms requiring a definition should follow the definition contained in the Emergency 9-1-1 Services Enabling Act, PA 32 of 1986 ("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"). However, after further

review of the definitions contained in Rule 2, Verizon believes the current proposed definition of “Emergency Response Location” (ERL) is vague and requires further clarification, similar to the language previously proposed by AT&T. Therefore, Verizon recommends the following revisions to subsection (e) of Rule 2(1):

(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)~~.

CONCLUSION

Verizon requests that Staff incorporate the additional revisions proposed by Verizon.