

Subject: Multi-line Telephone Systems and 9-1-1 Rulemaking - DRAFT 4 and 5

Three documents are available for your review:

- Draft 4 contains most of the comments sent by the core group.
- Comment Overview is a point-to-point explanation of how MPSC staff can use the information, or why it cannot, based on the Administrative Rules process.
- Draft 5 is a rewrite of the draft rules based on the Comment Overview.

The issues of most importance are:

- The Act mandates this change, not the rules.
- The Commission promulgates the rules, but additional responsibilities for the Commission regarding Sec. 405 are not mandated by the Act.
- The term "Specific Location" is the pivot of this rulemaking. What address and what information can dispatchers relay to first responders to find the caller?
- Promulgating rules based on changing technologies is difficult. Any reference to a specific technology should not be used, because it limits the rules.
- Documents with the potential to be changed (such as NENA documents) should not be referenced in the rules. Again, they may limit the rules.

Definitions that are found in the Act are found in these documents, because some commenters are not familiar with the Act. When the rulemaking is finalized, the only definitions that will remain in the rulemaking document, will be those definitions that are specific to the rules.

Please review all three documents and forward any comments by January 22, 2010 and reply comments by February 5, 2010. Also, do members of the core group feel it is time for a meeting based on core member concerns?

Thank you.

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