

**AT&T MICHIGAN'S REPLY COMMENTS TO STAFF'S
INFORMAL REQUEST FOR COMMENTS ON ITS PROPOSED RULES FOR 911
MULTILINE TELEPHONE SYSTEMS**

I. INTRODUCTION

Michigan Bell Telephone Company d/b/a AT&T Michigan (“AT&T Michigan”) appreciates the opportunity to offer informal comments on Staff’s initial draft of its proposed rules for 911 Multiline Telephone Systems (“MLTS”). These rules are proposed pursuant to Section 413(1) of the Emergency 911 Enabling Act, PA 32 of 1986 (“Act”), as amended. Attached to these Reply Comments as Exhibit 1 is a copy of Staff’s proposed rules, redlined to show the changes recommended by AT&T Michigan. These recommended changes are explained below.

AT&T Michigan’s comments are preliminary, and AT&T Michigan recommends that there be further opportunity for the industry and the affected end users to review and discuss draft rules. In particular, AT&T Michigan suggests that a Commission-sponsored workshop would provide a beneficial forum for interested parties to discuss potential rules.

AT&T Michigan also suggests that such a discussion should be informed by publicly-available documents on the issue. For example, a report from the National Emergency Number Association (“NENA”) entitled “Industry Common Mechanisms for MLTS E9-1-1 Caller Location Discovery and Reporting Technical Information Documents (TID)” (October 25, 2008) provides essential background on the MLTS issue. This report is attached as Exhibit 2. Likewise, the “NENA Technical Requirements Document on Model Legislation E9-1-1 for Multi-Line Telephone Systems” (February 19, 2009) provides model legislation on the MLTS issue and offers useful suggestions for addressing the issue. This report is attached as Exhibit 3.

II. DISCUSSION

PART 1 – GENERAL PROVISIONS

Rule 1 - Applicability

(1). The term “parties” should be deleted because it is not defined and because it could be interpreted to apply to service suppliers. Such an interpretation would be improper because under Section 413(4) of the Act, “the rules promulgated under this section do not apply to service suppliers”. Accordingly, there should be an explicit statement that these rules do not apply to service suppliers.

(4) The term “multiple dial tone access point communications systems” should be defined or, as Verizon suggests, should be replaced with the term “multiline telephone system”. In either case, the clause “as defined in Public Act 32 of 1986 (as amended)” should be deleted because neither term is defined in the Act.

Rule 2 – Definitions

(1)(b) The definition of “Automatic Location Information’ in the proposed rules does not match up with the definition of the same term in the Act. In order to minimize confusion and promote uniformity, AT&T Michigan recommends that the definition in the rules align with the definition in the Act.

(1)(e) The definition of “Master Street Address Guide’ in the proposed rules does not match up with the definition of the same term in the Act. AT&T Michigan concurs with Verizon’s suggestion that the rule be revised to conform to the statutory definition.

(1)(f) The term “Multiline Telephone Operator” is not used in the rules and therefore does not appear to be needed. If this term is required in the rule, AT&T Michigan recommends adopting the revised version of the definition proposed by Verizon. In any event, the word

“owners” should be deleted from the rule because the owner of the equipment could be a service supplier, and all service suppliers are required by the Act to be exempted from any obligations under the rule.

(1)(g) The term “Multiline Telephone System” is not used in the rules and therefore does not appear to be needed. If this term is required in the rule, AT&T Michigan recommends adopting the revised version of the definition proposed by Verizon.

(1)(h) The definition of “Public Safety Answering Point” in the proposed rules does not match up with the definition of what is essentially the same term (“Primary Public Safety Answering Point”) in the Act. In order to minimize confusion and promote uniformity, AT&T Michigan recommends that the definition in the rules align with the definition in the Act.

(1)(l) The term “Specific Location” is not used in the rules and therefore does not appear to be needed.

(1)(m) The term “Tariff” is not used in the rules and therefore does not appear to be needed.

PART 2 - RECORDS, REPORTS, AND TARIFFS

Rule 3

Under Section 413(4) of the Act, “the rules promulgated under this section do not apply to service suppliers”. Accordingly, proposed Rule 3 should be deleted in its entirety.

PART 3 - SERVICE USER RESPONSIBILITIES

AT&T Michigan is continuing its review of this proposed rule and has no comments at this time.

PART 4 - SERVICE PROVIDER RESPONSIBILITIES

Under Section 413(4) of the Act, “the rules promulgated under this section do not apply to service suppliers”. Accordingly, proposed Part 4 should be deleted in its entirety.

PART 5 - REPAIR AND INSTALLATION

AT&T Michigan has no comments at this time as to whether it is advisable for the Commission to adopt rules that address the repair and installation of Multiline Telephone Systems.

PART 6 - MONITORING

AT&T Michigan has no comments at this time as to whether it is advisable for the Commission to adopt rules that address the monitoring of Multiline Telephone Systems.

PART 7 - WAIVERS

AT&T Michigan recommends that these rules authorize waivers, but does not have any proposed language at this time.

PART 8 - EXCEPTIONS

AT&T Michigan agrees that the proposed rules should permit exceptions for service users that maintain alternative means of providing location information to emergency responders and for service users that are not technically able to provide the requested Emergency Response Location information. The exceptions, in Part 8, however, do not go far enough in providing exceptions to service users. Moreover, they do not establish a streamlined process for granting

exceptions. Verizon has proposed additions that address these issues and AT&T Michigan concurs in those proposals.

It may also be worthwhile to consider a rule that would exempt from these requirements a business that operates a Private Emergency Answering Point (“PEAP”) within its own facility. This exemption is contained in MLTS rules adopted by the Illinois Commerce Commission at 83 Ill. Admin. Code Section 726.400.

Finally, AT&T Michigan is aware of some service users that, on their own initiative, have already established the capability to provide additional location information to emergency responders. These service users should be permitted to retain their existing systems and should not be required to bear the added expense of retro-fitting their systems to comply with new Commission requirements. Accordingly, AT&T Michigan recommends language that would “grandfather” existing service users that already have the capability to provide location information.

III. CONCLUSION

WHEREFORE, for all of the reasons set forth herein, AT&T Michigan requests that Staff revise its proposed rules consistent with the recommendations herein.

Respectfully submitted,

Mark R. Ortlieb, General Attorney
AT&T Michigan
221 N. Washington Square, First Floor
Lansing, MI 48933

Dated: June 30, 2009