

Attached is a document which includes Frontier's comments on the proposed rules.

We had comments on Rule 3 of Part 2, with the concern being that the "service supplier" of a particular end user (their LEC) may not be the 911 database administrator, and hence would not be able to provide access to the 911 database.

Regarding Part 4 in general, Frontier does not believe that these rules should apply to "service suppliers".

Please contact me with any questions.

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ATTACHMENT:

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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 parties as defined by the Emergency 9-1-1 Services Enabling Act, PA 32 of 1986 as revised.

(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 multiple dial tone access point communications systems as defined in Public Act 32 of 1986 (as amended) 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 Information" (ALI): Automatic display at the PSAP of the caller's telephone number, address/location of the telephone and supplementary emergency services information.

(c) "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.

(e) "Emergency Response Location" (ERL) 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)

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(d) "Master Street Address Guide" (MSAG): Database containing information provided by a 9-1-1 service district defining the geographic area of the 9-1- service district, including street names, range of street address numbers, communities of the 9-1-1 service district, emergency service zone of each service user, and the public safety answering point identification codes.

(e) "Multiline Telephone Operator" (FCC 03-290 FN 177) the owners and operators of multiline systems such as businesses, hospitals, and universities.

(f) "Multiline Telephone System" (MLTS): A private branch exchange (PBX), a Centrex telephone system, a key telephone system, and a hybrid telephone system.

(g) "Public Safety Answering Point" (PSAP): A facility that has been designated to receive 911 calls and dispatch/route them to emergency services personnel.

- (h) “Public Switched Telephone Network (PSTN): Worldwide voice telephone network accessible to all those with telephones and access privileges (Newton’s)
- (i) “Service Supplier” means a person providing a communications service to a service user in this state.
- (j) “Service User” means a person receiving a communications service.
- (k) “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.
- (l) “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.
- (m) “Voice over Internet Protocol” (VoIP) a 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)

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

PART 2. RECORDS, REPORTS, AND TARIFFS

R 484.XXX Availability of Records

Rule 3. The administrator of the 9-1-1 database shall provide access to the 9-1-1 database to the service user as needed to comply with these rules.

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 private business switch or multiple dial tone access point communications system (needs definition), or provides telecommunications facilities or services, including Voice over Internet Protocol (VoIP), shall assure that the system is connected to the public switched telephone network in a manner that calls to 9-1-1 result in accurate automatic number and location identification that can be verified in the 9-1-1 Master Street Address Guide.

(2) 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. 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). 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. 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.

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

PART 4. SERVICE PROVIDER RESPONSIBILITIES

(Does this apply? Please provide draft rules.)

[COMMENT: Frontier is unclear whether the term "Service Provider" is intended to mean "service supplier", as that term is defined in the statute and draft rules, or something else. In either case, there should be no rules pertaining to service suppliers. The statute specifically states that, "The rules promulgated under this section do not apply to service suppliers". Section 413 (4)

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

PART 5. REPAIR AND INSTALLATION

(Does this apply? Please provide draft rules.)

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

PART 6. MONITORING

(Does this apply? Please provide draft rules.)

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

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PART 7. WAIVERS

R 484.XXX Waivers

Rule XX. (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 XX. (1) 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.

(2) 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.

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

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