

MICHIGAN STATE UNIVERSITY

August 19th, 2009

Robin Ancona, Director, Telecommunications Division
Michigan Public Service Commission

RE: Multi-Line Telephone Systems and 911 – Comments on DRAFT 2 rulemaking language

Ms. Ancona,

I am writing to provide comments on DRAFT 2 of the informal MLTS rulemaking language regarding multi-line telephone systems and 911 in the state of Michigan. I do not know if the original request for comments memo for DRAFT 1 language was ever sent to MSU, however, judging by the lack of any comments received thus far by the MPSC from the telephone system operator end-user community, many if not most operators are not aware of these proposed rules and their serious consequences. Please accept these comments, post them online for public viewing, and strongly consider their merit on this important public safety issue. Thank you.

Background

Michigan State University is a state institution of higher education with its main campus located in East Lansing, MI. We also have a physical presence in all 83 Michigan counties and a satellite campus in Dubai, UAE. Telecommunication Systems is the department at MSU responsible for administration of telephone service, among other duties.



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Impact of Proposed Rules on Telephone System Operators

MSU, like many institutions, has a mixed telephone system environment, not a single, centrally managed private branch exchange (PBX) system that is technically capable of providing E911 enhanced location information. Even sites that do operate a centralized E911 capable system may have remote campuses, clinics, extension offices, or research facilities with older, non-E911 capable systems. The impact of the proposed rules on these disparate telephone systems will be financially and operationally unacceptable for many operators; the proposed rules create an unfunded mandate to upgrade systems that currently meet the operational needs of the impacted end users.

Concerns Specific to MSU and to Our Systems

MSU has three distinct types of telephone systems serving its hundreds of physical locations and its tens of thousands of end users.

1. Centrally run PBX with one line per user and E911 to the local PSAP
2. Digital / analog Centrex with one line per user and E911 to the local PSAP
3. Analog Centrex lines shared by many users on multi-line telephone systems

MICHIGAN STATE UNIVERSITY

Types one and two already meet E911 requirements to the room but type three does not. MSU operates hundreds of these multi-line telephone systems in facilities that, under the proposed rules, would need to be replaced at a very high cost and with considerable effort. Most of these systems were installed starting in the late 1980s and they are not technically capable of providing the outbound ANI information required to support E911. This is because they cannot support the advanced trunk connectivity required such as ISDN-PRI, DIOD, or CAMA. The proposed rules create a serious financial and operational burden in their current form because the affected systems are not funded for replacement in the proposed timeframe yet said systems meet all other needs of their current users.

It should be noted that these existing multi-line telephone systems do provide location information at a building level presuming the shared analog Centrex lines serve users in a single master street address guide (MSAG) validated location.

Suggested Compromise

MSU supports rules that enhance public safety. However, without adequate funding the proposed rules are not feasible to telephone system operators in the allotted timeframe, especially given the predicted short to medium-term economic climate in the state of Michigan

Therefore, MSU feels strongly that existing systems not technically capable of E911 be granted an exception and be allowed to remain in their current configuration until such time as they need to be replaced as determined by each system owner. Furthermore, no additional intra-building notification solution should be mandated in this scenario without appropriate associated funding.

MSU, in support of the proposed rules, feels they should only apply to new system installations or to existing systems that are already technically capable of meeting E911 requirements. This approach would cover a large number of systems and would indeed enhance public safety while not adversely affecting telephone system operators.

Respectfully submitted,
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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 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).

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(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]

(h) “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]

(i) “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)

(j) “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)

(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 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) (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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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) 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.

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

(5) Service users of a building served by a MLTS that is not technically capable of enabling ERL to be transmitted may request an exception from the commission.

(6) 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.

Deleted: 5

(7) 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.

Deleted: 6

(8) If a request is not automatically approved, the Commission shall grant an exception for the reasons set forth in subparts (1) – (5) upon a showing of good cause.

Deleted: 7

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