

VERIZON COMMENTS REGARDING THE REQUEST FOR COMMENTS DRAFT 5  
AND OTHER REQUESTED INFORMATION

Thank you for the opportunity to comment on the MPSC's Staff rewrite of the draft revised proposed rules for Multiline Telephone System ("MLTS") 9-1-1 calls sent to us on January 4, 2010 ("Draft 5") and other requested information. These comments are submitted on behalf of Verizon North Inc., Contel of the South, Inc. d/b/a Verizon North Systems, and MCI Metro Access Transmission Service LLC d/b/a/ Verizon Access Transmission Services (collectively "Verizon").

Overall Verizon Comment Regarding the Most Recent Draft 5

Draft 5 represents a significant departure from previous drafts. Draft 5 attempts to merge Parties' comments, draws many conclusions, adds new issues not previously addressed in Parties' comments, and removes language that previously appeared not to be in dispute. Significant cornerstones such as the definition of MLTS, Specific Location, and Emergency Response Location have been altered or deleted all together. The effect of these language changes appears to result in a rule that would apply to most end users in Michigan with more than one device or the smallest of office locations rather than a focused rule that targets a specific set of end user locations where additional location information was deemed necessary from a public safety standpoint. Having made that observation, Verizon would one again emphasize that these rules are applicable only to service users as specified by Section 405 of the 9-1-1 act and should not be used as a vehicle to impose any additional requirements on service providers.

Verizon's Informal Response to Specific Issues

in Staff's email dated January 4, 2010

The other requested information includes:

1. What address and what information can dispatchers relay to first responders to find the caller?

Answer: Verizon is not in a position to address the technical answer to this question. The State 9-1-1 Committee (Committee) and the MPSC as a member of the Committee, is the appropriate party to address this issue.

2. Promulgating rules based on changing technologies is difficult. Any reference to a specific technology should not be used because it limits the rules.

Answer: Verizon agrees that the Draft 3 definition does appear to limit the application of the rules to a specific technology. However the new Draft 5 definition is overly broad.

3. Documents with the potential to be changed (such as NENA documents) should not be referenced in the rules. Again, they may limit the rules.

Answer: Definitions did not reference NENA. The definitions stand on their own merit as included in the previous drafts.

4. The Commission promulgates rules, but additional responsibilities for the Commission regarding Sec. 405 are not mandated by the Act.

Answer: Verizon advocates that the MPSC does have oversight and enforcement of the rules they promulgate.

Lastly the Commission staff requests, “Also, do members of the core group feel it is time for a meeting based on core group concerns?” Verizon advocates that a “core group”, formal or informal does not exist and that it is time to start the formal process of rulemaking since the informal process has not yielded significant progress or input from many of the service users that will be impacted by this MLTS rule.