

Carr Telephone – the rulemaking does not place responsibilities upon the carrier, per the Act

Frontier Communications – the use of “service supplier” has been deleted from the document

DIT/Management and Budget –

1. The Act does not allow any MLTS service user to be allowed to not conform with the Act. The law states “each service user”. The information in Rule 1(2) draft 2 was submitted by the State 9-1-1 Committee and has been combined with the definition for “Specific Location.”
2. Comment 3 – MPSC internal procedures during the informal draft rulemaking do not limit the comment period to MLTS users. The MPSC rulemaking process is an open, public forum.
3. Comment 3 – A definition for “specific location” is being developed with the use of both the subcommittee and ERL definition being combined to meet wording of the Act. The core group will need to approve definitions that are not in the Act.
4. Comment 4 – Definitions and procedures in NENA documents are fluid, changing frequently. In addition, the National Emergency Number Association is an organization, not a governmental body. The use of Emergency Location Identification Numbers (ELINs) is not an FCC recognized use of dialable telephone numbers.
5. Comment 5 – This rulemaking stops at the dispatcher’s desk, when the dispatch call to emergency personnel has taken place. The rules to ensure that security personnel, fire brigades, emergency response teams and other such internally used mechanism are “met and adequately directed” need to be accomplished by another agency.
6. Comment 6 – The definition of “specific location” is addressed above in Comment 3.
7. Comment 7 – ELINs will not be used in the document. Not an FCC recognized use of dialable telephone numbers. The use of call back numbers is historically known as ANIs and p-ANIs, already defined in this document.
8. Comment 15 – Service suppliers have no responsibilities within these rules per the Act. The State 9-1-1 Office has stated many times that E9-1-1 is available throughout Michigan.

Andrews University

The use of “database service provider” intends on a service supplier to perform duties. The Act does not allow a service supplier to incur any duties with multi-line telephone systems.

If the “database service provider” is not a “service supplier,” as defined in the Act, please redefine and resubmit your comments.

Michigan State University

“...the proposed rules create an unfunded mandate to upgrade systems that currently meet the operational needs of the impacted end users.” The rules do not create an “unfunded mandate,” the Act directed MLTS users to ensure that people using the service could be found in an emergency.

Verizon

1. Definitions will be taken from the Act, when possible. Others will be agreed upon by the core group. Definitions will not be taken from the NENA documents, without core group approval, due to the fluidity of the NENA documents.
2. Public Switch ALI (PSALI) may limit the rules to specific technologies.
3. The use of 6,000 and 40,000 square foot, as the geographic space, may be too large a geographic area to meet the requirement of “specific location” as defined by the core group.
4. The notification of the Commission by service users will require additional MPSC staff, which will require funding. The current funding mechanism for MPSC staff is not used for 9-1-1 initiated requirements.
5. Exceptions: use of ERLs limits the rules.
6. Exceptions: use of MPSC staff to research exceptions will require additional MPSC staff, which will require funding. The current funding mechanism for MPSC staff is not used for 9-1-1 initiated requirements.
7. Exceptions: 10 days or exceptions will be automatically approved is unacceptable.

AT&T

1. Use of NENA documents is discouraged, because they are ever changing documents and definitions.
2. To include any information about a Private Emergency Answering Point (“PEAP”), a core group approval of the definition is necessary.
3. “...service users that, on their own initiative, have already established the capability to provide additional location information to emergency responders.” “Additional location information” and “Specific Location” must somehow meet. Any communication not made at the dispatcher’s desk, to “provide location information to emergency responders” is not within the confines of the Act. If the service user has the capability to meet the “specific location”, the action of “installing” may be grandfathered.
4. AT&T “proposes to delete the reference to the defined term “specific location.” The term “specific location” is in the Act, and the term ERL is a term coined by the NENA.
5. AT&T stated that it is their “understanding that enhanced 9-1-1 is already deployed in almost all areas of the state.” Exception Rule 7(3) is deleted.