



STATE OF WASHINGTON
MILITARY DEPARTMENT
EMERGENCY MANAGEMENT DIVISION

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July 22, 2004

Mr. Bob Williamson
Washington Utilities and Transportation Commission
1300 South Evergreen Park Drive SW
Post Office Box 47250
Olympia, Washington 98504-7250

Dear Mr. Williamson:

The Washington State E911 Program is requesting consideration by the Washington Utilities and Transportation Commission (WUTC) to standardize 911 network costs in accordance with the Federal Communications Commission (FCC) rules. Cost models in place within Washington State address telecommunications companies differently.

Public Safety Answering Points (PSAPs) currently pay Incumbent Local Exchange Carriers (ILECs) for connections between their end offices and the Selective Router (SR). PSAPs are not required to pay for connections between Competitive Local Exchange Carriers (CLECs) switches and the SR or between cellular switches and the SR. PSAPs are required to pay for all connections between the SR and the PSAPs.

In its King County order, the FCC stated, "We find that the cost allocation point for E911 implementation should be at that point at which the system identifies the appropriate PSAP and distributes the voice call and data location to that PSAP". The "point" or demarc line referred to by the FCC is the SR. **The Washington State E911 Program fully supports the FCC decision that the allocation point be the SR and requests that this be applied to all telecommunications companies doing business in the state.**

The FCC determined that CLECs and cellular communications companies could recover their costs from customers in any reasonable manner. ILECs can recover the cost before the SR as part of "basic" service cost. Rural carriers can access the Universal Service Fund for 911 cost reimbursement as part of the Basic Services requirement.

Technology has changed and new providers have entered the telecommunications market. These new providers may have switches in other states and ILECs have consolidated SRs



Mr. Williamson
Page 2
July 22, 2004

to the point that only ten SRs serve Washington State. Therefore, the PSAPs should not have to pay for any connections on the telecommunications company side of the SR.

Please direct questions to Kurt Hardin, E911 Customer Support Supervisor, at k.hardin@emd.wa.gov or (253) 512-7014.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert G. Oenning", with a stylized flourish at the end.

Robert G. Oenning
Washington State 911 Coordinator

Cc: County Coordinators