



DEPARTMENT OF INFORMATION RESOURCES

Post Office Box 13564 ♦ Austin, TX 78711-3564

Tel: (512) 475-4700 ♦ Fax: (512) 475-4759

DOCKET FILE COPY ORIGINAL

September 21, 1994

RECEIVED

SEP 22 1994

FCC MAIL ROOM

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, NW
Washington, D.C. 20554

Re: IAD File No. 94-101
CC Docket 92-105

Dear Mr. Caton:

Enclosed for filing is an original and nine copies of the Texas Department of Information Resources reply comments on the assignment of N11 Codes. Please acknowledge receipt of this document by date-stamping the duplicate copy of this letter and returning it in the enclosed self-addressed, stamped envelope.

Sincerely,

Carolyn Purcell
Executive Director

ES:DW:JJ:ad

- cc: **The Honorable Jack Brooks**
- The Honorable Jack Fields**
- National Telecommunications and Information Administration**
- National Association of State Information Resources Executives**
- National Association of State Telecommunications Directors**
- Texas Advisory Commission on State Emergency Communications**
- Texas Office of the Attorney General**
- Texas General Services Commission**
- Texas Office of State-Federal Relations**

No. of Copies rec'd
List ABCDE

OH9

"if the Commission determines that it is in the public interest to assign undesignated N-1-1 codes (i.e., 2-1-1, 3-1-1, 5-1-1, ... [and] 7-1-1 ...), the application should be public service oriented...."

DIR supports the position that any allocation of N11 codes:

- **should specifically be predicated on use for public service purposes**
- **should reserve a specific number or numbers nationwide for allocation for use by state and local government**
- **should require N11 code recipients to educate the public on the application of that particular N11 code to prevent confusion with existing 911 emergency communication services**
- **should require N11 code recipients to provide a preamble or some means of identifying the N11 code assignee.**

DIR opposes the issue of expanded N11 codes using N11# and/or N11*, as we do not regard that to be in the public interest. However, should an expanded code set be developed, use of the 911 base prefix should be specifically prohibited.

BACKGROUND

Federal and state agencies currently fund 800 numbers for the public to access voice and electronic-based information. Multiple 800 and local numbers, however, do not provide consistent and useful access to information and services. The use of 800 numbers, in fact, adds to the cost of making information available. Some states, including Texas, and federal agencies have tried using electronic kiosks to access information and services, but this effort has not been universally successful. The kiosks' lack of a consistent and user friendly access to public information and services does not support the current federal government initiatives for the National Information Infrastructure and the revisions to OMB Circular A-130.

The Texas Public Utility Commission recently denied N11 applications for commercial purposes and adopted recommendations by the several state agencies (General Services Commission, Advisory Commission on State Emergency Communications, and Department of Information Resources) to establish a rulemaking project to explore potential public interest uses of N11. DIR's summary of testimony before the Texas Public Utility Commission is included as Attachment A to these reply comments.

The State of Texas has proposed evaluating the use of standard N11 numbers for providing citizen access to government information and services. In a pending proposal before the National Telecommunications and Information Administration, DIR describes a plan to access distributed information of public interest in electronic form through the current infrastructure (N11).

Technology is available to access both voice and data services through a single telephone number. Existing 911 access to emergency services is a success because the number is easy to remember and is being deployed consistently nationwide. DIR anticipates seeking approval of the Texas Public Utility Commission for an N11 pilot project proposal as submitted to the National Telecommunications and Information Administration. The N11 pilot project could provide federal, state and local government guidance and direction for appropriate use and allocation of N11 numbers for public access to information and services. A copy of proposal excerpts is included as Attachment B to these reply comments.

In reviewing the 216 responses to the FCC request for comments, state governments and public service organizations have supported the intent of the GSA, NASTD, and TRS proposals. Only Florida supported the proposed usage by Information Service Providers; however, Florida allowed Southern Bell to issue their unassigned N11 numbers (211, 311, 511, 711,¹ and 811) to private industry. The Florida N11 lottery was open to anyone willing to pay \$10,000 a month for each N11 number. The lottery approach, however, limits consumer choice of information providers. Just as the frequency spectrum should be considered a national resource, so should the remaining N11 numbers.

SUMMARY

In summary, the Federal Communications Commission can ensure that N11 assignments are consistent nationwide by reserving as stated above the four N11 numbers for allocation by state and local government regulators for public interest purposes. The Texas Department of Information Resources urges that the Federal Communications Commission take no action that would preclude the State of Texas from assigning N11 codes for public interest purposes within the state.

¹ 711 is used in several states for deaf relay, and should be reserved for this service nationwide.

TEXAS PUC DOCKET 11441
PREFILED DIRECT TESTIMONY OF ANN BAKER
DEPARTMENT OF INFORMATION RESOURCES

Page 3 of 18

1 its interstate counterparts.¹ All available N-1-1 numbers should be reserved for public
2 service applications like those described above.

3 Q: DO YOU INTEND TO ADDRESS EACH OF THE ISSUES IDENTIFIED BY THE
4 EXAMINER ON PAGES 28-31 OF EXAMINER'S ORDER NO. 9?

5 A: No, I will not discuss each and every issue listed by the Examiner since many of
6 them involve matters that do not relate to the purpose of my testimony. For the ease
7 of the judge I have prepared Exhibit 3, which is a restatement of each of the issues, with
8 a brief response or an indication that I do not address that issue.

9 ¹ Two numbers may be required for voice and TDD/PC access, or one for state and one for
10 interstate relay access. The FCC and North American Numbering Plan Administrator are considering
11 reserving one or more N-1-1 codes for relay access. I will not further discuss relay systems in my direct
12 testimony. TEX-AN is addressed in part VI. below.

OPTIONAL MATERIALS - EXPANDED NARRATIVE

SUMMARY

The State of Texas Department of Information Resources (DIR) requests a Category II grant from the National Telecommunications and Information Administration to fund planning for the development of a common gateway to access distributed information of public interest information in electronic form through the current telecommunications infrastructure.

The planning will focus on two related areas:

General Planning: Designing a common gateway to be provided to information, both private and public (local, state and national) and the State's role in coordinating this effort.

Pilot Planning: To assist such general gateway planning by planning a specific pilot project in cooperation with other parties to an ordered proceeding before the State Public Utility Commission that would use three digit dialing codes (N11, as in 411, and 911) as a gateway to information of public interest. The pilot would access several of the state's existing databases such as the Texas Employment Commission's database.

The result of the planning effort is to encourage technology innovation and effective cost reduction of open government through competition among the different technologies that could provide access to and deliver government information and services. This proposed planning activity will be called the Coordinated Open Government Gateway Project.

Pilot Project: The Public Utility Commission Proceeding and Use of N11 as a Gateway to State Databases. On May 3, 1994, the Texas Public Utility Commission completed a year and a half proceeding has concluded that an assignment to commercial providers is not in the public interest; and recommends a project to consider potential public interest uses of N11. In this proceeding private commercial providers of information services had requested the assignment to them from telephone companies of N11 dialing codes. The State of Texas maintained that the use of the N11 numbers should be for public interest use and offered to help design a general N11 gateway through which all Texans with telephones could access both public and private information. The Public Utility Commission of Texas Proposed Final Decision in Docket No. 11411 is attached. [Petition of Infodial Inc., Austin American Statesman, Longview News Journal, Waco Tribunal Herald, Lufkin Daily News for Assignment of Abbreviated in N11 Dialing Code.]

The Public Utility Commission denied the request for commercial use and has instructed its General Counsel to initiate a project to review public interest uses of N11 dialing codes. The timing of the Public Utility Commission determination will parallel the timing of the planning project proposed here. It will automatically provide a forum for collaboration in the planning process with both telephone companies and commercial information suppliers which have been

involved in the N11 proceeding. (List of parties attached in optional materials.)

Several states have decided the N11 issue differently, and have allowed for experiments of the use of N11 by the commercial information providers. These commercial experiments are already underway in Georgia and Florida. A planned use in Texas of N11 as a public gateway to information will provide the nation an alternative model, one that may have durability after three digit dialing codes other than N11 become available for commercial use.

The long term objective of the N11 pilot project is to determine the feasibility of using an N11 access code for local access gateways to all sources of information whether publicly or privately held. The pilot project will demonstrate whether or not N11 is a vehicle/media that could work for access to state information.

The pilot will test if public interest is best served by using N11 as an access method to a first level gateway that can then connect the calling party to second level gateways which would in turn lead the caller to the entire spectrum of available public or commercial information sources. Such services would be available statewide.

The planning grant will be used to analyze system requirements and recommend N11 configuration(s) which will consider the needs of all target groups and the potential use of the system for access to local as well as state government agencies. Plan development will include any necessary or additional considerations to ensure open and equal access to all citizens. System planning will include short term and long term planning. Short range planning issues to be evaluated:

- The means by which N11 codes in any LATA will most efficiently be routed from every Texas telephone company to a common gateway.
- The selection of government information for inclusion in the pilot project.
- The form of the gateway interface and method of user control to route requests for information, including indexing and directory maintenance.
- The best technology to permit accessing information in both voice and data formats.
- How the pilot project can best test its utility to a wide range of users, especially including less sophisticated users and those without powerful information resources.
- How the pilot project can meet the needs of handicapped persons.
- How to operate the gateway, including arrangements for bidding among those who might operate it for the state.

- Allocation of the costs of accessing information through the gateway among customers, the State and providers of private information, appropriate tariffs, and the method of billing users.
- Method of evaluating the pilot project. Projection of costs and benefits.

Long term planning issues will include the deployment of a comprehensive gateway as well as the arrangements that will eventually exist between private information sources (commercial) and sources of public information. Other long range planning issues to be evaluated are:

- Inclusion of information provided by private sources.
- Inclusion of information in video format, and the relation of the gateway to "video dial-tone".
- How the gateway will provide access to second level gateways, i.e. commercial gateways, commercial electronic yellow pages, etc., particularly to ensure for equitable competition in the provision of such services.
- The relation of a Texas information gateway to gateways developed and operated in other parts of the country.
- What functionalities of the gateway should be considered as part of universal service.
- Overall cost/benefit projections.

N11 is just one gateway which will be reviewed; other gateways using other technologies will be considered; and a Request for Partners will be developed to ask the marketplace to propose alternative gateways in providing public access.

The library community will assist in planning on how to best link existing resources via use of common interface to provide access to voice and data. Other items to be planned, analyzed, and researched with the assistance of the library community are: directories, organization of information in databases, standards, content-information about public service (i.e. job openings), and privacy safeguards.

If successful, this model will make information of public interest, whether publicly or privately held, more widely available and improve the ease and speed of public access to this information.

Why DIR is Qualified to Perform the Proposed Project

The Department's major strength is its professional, motivated work force. DIR is an innovative agency for which technical professionals want to work. In addition, the Department has a

considerable research asset in its technical library, which is open to the public. Included in the library are on-line databases, the latest technology periodicals, and third-party technology analysis services. Also available in agencies' Strategic Plans are inventories of the state's installed based of information resources.

DIR Technical Capabilities: The Department of Information Resources houses and operates state-of-the art computer and communications facilities. A wide area network has been established in Austin using a high speed fiber optics system connected to a mainframe computer. Electronic mail connections to the university systems and other agencies are in place and being use on a widespread basis. DIR has a high concentration of technical staff who are very capable in wide area and local area networking design as well as operations.

The DIR also offers it technical services for requirement analysis, system analysis and design, etc. as well as its telecommunications services to other state agencies on a cost-recovery basis.

DIR Planning Capabilities: DIR, through its information resources planning responsibilities, serves all state agencies, universities, and other entities created by the Legislature, including local government. The planning for the development of gateway(s) relates to a broader telecommunications process which is ongoing in the State of Texas. The Department of Information Resources, the Comptroller of Public Accounts, and the General Services Commission have joint responsibility for planning and managing a statewide telecommunications network. [TEX.REV.CIV.STAT. Ann. art. 601(b), §10.02 (Vernon Supp. 1994)]. Currently, the Telecommunications Planning Group (TPG) is in phase two of its planning process and is developing a Strategic Telecommunications Plan due to the Legislature and the Governor on September 1, 1994.

Nationally, DIR has gained recognition as a leader in the open systems arena. DIR staff has chaired the Technical Committee of NIST OIW (National Institute of Standards & Technology Open Systems Environment Implementors Workshop).

End Users

There is a growing demand for state government information through computers. This is demonstrated by the rapid increase in the use of computer networks and "bulletin board systems." The Internet is adding 15 million users each year worldwide; the Texas Education Network (TENET), and DIR's own electronic bulletin board is serving thousands of users each month. Unfortunately, the dissemination of online government information has become diffuse and widely decentralized. As more information become available online, the task of finding, navigating, and accessing this data becomes more complex. The 500 users a week who use the State Comptroller's "Window on State Government," for example, may not know how to access the Ethic Commission's database on lobbyists and politicians. Most of these bulletin boards have been operated through independent 1-800 numbers operated by different agencies. Many of the bulletin boards have proprietary interfaces, and require the user to provide a username and password. Thus, the citizen must know several passwords to access electronic information available at various agency databases.

Other impediments exist to public access for information. Often, the citizen finds it difficult to determine what agency to contact for assistance, and who to call for answers. It is often difficult to determine exactly what public information is available through the state, and where to identify all relevant information when related programs are administered by multiple agencies. As the State Comptroller's recent Texas Performance Review report revealed, many state agencies spend unnecessary staff and equipment resources in maintaining duplicate information across agencies and systems.

What is needed is a common, standard interface that will allow these users a more efficient and cost-effective means of accessing state government services. DIR has already had success in this area, creating a new "Gopher", or navigational tool, to help users through the Internet maze. This gopher is known as the "Texas Information Highway" and is becoming a "blue page" to Texas state government.

At the Government Technology Conference held in Austin Texas in February 1994, state government agencies demonstrated their public access projects. Different agencies were proceeding independently of each other, with incompatible technologies, and interfaces. Several of them were unaware of the efforts of the others. The average citizen would not know where to begin to find what he needs.

N11 access provides an easy to remember, statewide (or nationwide) uniform number that people can call to obtain virtually any desired information, from public or private sources. Essentially, the state's use of an N11 number would give the citizen a "one-stop shopping" gateway to public information eliminating the need (and the cost) for several 1-800 number access to state programs. With 1-800 numbers, adding more features such as automatic number identification, answer supervision, and selective routing would be difficult if not impossible. An N11 number would not only be easier to remember, but would reduce duplication of services saving taxpayer dollars. The first phase of the subsequent demonstration project would link the state's separate bulletin board systems into one single, interoperable network of databases, accessible through one telephone number. The second phase of the demonstration pilot will institute agency-wide e-mail forums, and access to existing online services.

This demonstration pilot project would last approximately one year, after which the state would begin formalizing its policy on public access and other means to achieve development of a national information infrastructure.

Overall Planning Objectives

Develop an information infrastructure making the maximum use of existing technologies. This infrastructure will support a wide range of government functions such as education, health, and criminal justice; and allow for citizen access via a single point of access. This infrastructure will be an interoperable, multijurisdictional network for all citizens to access. It will also be an open network adhering to standards that allow for flexibility and scalability.

As information sources are identified and logically categorized with the assistance of the Texas State Library and the library community, the end result is to maximize the use of existing resources, and coordinate delivery of services, streamline/eliminate duplicative efforts in delivery of government services.

Develop a gateway(s) that is self-supporting as well as ensures ubiquitous, equitable access to information.

Make government information reasonably accessible and universally available.

Assist citizens and businesses to access information of public interest from government and private sources via a single point of access.

Objectives of the Planning Pilot Project

Design a common access point (gateway) that uses multiple information technologies to provide a single face to information of public importance. Organize new communications environment to ensure coordination of standards, and protocols.

N11 will enable use of existing technology to allow for access of public information and incorporate existing technology on a widespread basis to change the way state agencies are providing public access today.

Provide a level playing field for information providers to access N11.

What Systems Will be Utilized and Why They Were Chosen

To provide ready access to information of public interest via a readily accessible medium, the public switched network will be used. This system was chosen because phone service is ubiquitously available. With the use of N11 (three-digit dialing code) customers would have easy access to information from their home, a neighbor's home phone, local grocery store, or any other public place where a phone is available.

N11 can provide voice and/or data access. This access could link to government bulletin board systems via a common interface, such as the Department of Information's Texas Information Highway (gopher) or the TEXAS-ONE (gopher) located in the Texas Department of Commerce. These gophers are accessible via the internet as well as other state government databases, such as the Texas Employment Commission's job information, and the Comptroller's Window on State Government bulletin board system.

Other systems are expected to be proposed by the vendor community in response to a Request for Proposal to be developed by the planning team.

Services To Be Provided

With the planning assistance of the Texas State Library, directory services, indexing, and

referencing of the information will provide easy location and retrieval of the information requested. The Texas Information & Referral Clearinghouse Project will provide its expertise in locating what information is most pertinent to the health and human Services customer base. In addition, the Texas Information & Referral Clearinghouse Project will sponsor user forums to ensure that the information that is made available is of importance to the user community.

Planning considerations include the addition of private information service providers (local and national) to share the use of the N11 three-digit dialing code.

Are Proposed Systems Unique or Improvement of Existing Technology?

The systems to be used by the Department of Information Resources currently exist and would be considered expanded uses of existing technology. The public switched telephone network exists and will make use of one or more of the unassigned statewide local dialing codes. A "collection point" within each city or LATA would receive the call. There are 17 LATAs in Texas. If the call were local it could be completed or if the information source is in another location, the call would be switched over the intercity network for transmission to the correct location. Local interconnection and access and distribution are key to the use of the N11. One advantage of N11 is that it can provide for billing and collection for users on their phone bill. N11 could provide access to information of public interest at a cost lower than to provide today's information requests.

The Request for Proposal to be developed as part of the planning process will require that the vendor make use of existing state resources as well as private resources (networks).

How Will These Services Be Provided?

With the N11 three-digit dialing code services will be provided in a "self-service" mode. Training is an essential planning component so that users do not confuse the N11 dialing code with the emergency three-digit code "911".

Provisions To Address Minority Concerns

(1) Plans will assure services will be accessible to as many people as possible regardless of ethnicity or disability. Users will be able to access voice or data information. No special equipment is required to access voice service over the over the public switched network. For the hearing impaired, services could be available over the Texas Relay network currently in use today. (2) The planning process will include considerations for Spanish speaking citizens of Texas. Local advocacy groups are currently providing support to non-English and Spanish speaking citizens for assistance from the Health and Human Services agencies. This support is expected to continue with the development of the coordinated open government gateway project. (3) Also, the Governor's Commission for People With Disabilities will be consulted during the planning process.

Who Will the Pilot Project Serve?

Initially, the pilot project will target health and human services clients and providers, and small

businesses and manufacturers. The study will identify recommended methods for providing access to public information of interest to the general public. These models could be expanded statewide to serve all citizens of Texas as additional priority information needs become known.

What Is the Location of the Project

The planning process will determine specific geographic areas for demonstration pilots. The needs of the target audience to access information pertinent to their interests are the same regardless of geographic area.

Design Considerations for the Pilot

Various technical configurations for using N11 as a gateway will be evaluated. Part of the planning phase will be to determine the most cost effective approach for the pilot. The pilot could be set up with call forwarding to allow line side access. All telephone companies would be required to establish a call forward. A PUC order is required to get all phone companies to forward N11 calls. This approach is technically feasible and is a basic POTS (plain old telephone service) connection. An experimental tariff could be obtained for the pilot.

Long-term planning considerations include setting up N11 access in each of the 17 LATAs. N11 could be set up with trunk side access to allow for selective routing and allow for LATA origination; pilot test intelligent interfaces for public information access.

Operations of the network could be bid by public or private enterprise. This will be evaluated as part of the planning phase. A cost/benefit analysis will be performed during the planning phase to determine the most cost-effective alternative to provide operation of the gateway for the pilot.

Methods

Public input will be gathered at PUC hearings and focus groups regarding the role of public and private entities in providing public access. Negotiations will be conducted during the Request for Partners evaluation as well as with the N11 proceeding participants.

Standard strategic and tactical planning methods will be used.

Evaluation

During the planning phase, data will be collected on how many citizens are using existing gateways and for what services. Based on the type of services used, a program of coordination will be devised. The evaluation phase of the project will be ongoing, testing the viability of different types of interfaces and increasing the use of the gateway numbers throughout the state. Other policy issues to be addressed include network reliability and information security and privacy. The policy issues to be addressed during the pilot will serve as a basis for Texas' statewide policy on public access. Feedback will also be obtained from users through focus groups.

Future Funding

DIR intends to request federal assistance after the planning phase for implementation of the proposed demonstration pilot. After the pilot project, it is anticipated that other segments of government will become involved, using an N11 code as an access point to information. DIR plans to broaden public access to such information as education, transportation, criminal justice law enforcement and legislative issues.

Benefit to Citizens

With government information available via a simple, easy to remember N11 number the general public could gain the following benefits:

- The state assumes a leadership role in providing the citizens of Texas with access to government information. This can be done with N11 available for government use.
- Greater access to information about public administration, education, transportation, health care. [Examples of uses: access to public libraries including university libraries; access to bulletin boards; ability to converse with law and policy makers and provide comments input to the legislative process; access to hotline on health issues, (AIDS, Cancer). Future applications: Pay taxes, certifications, etc. via the public access network. Register for school, pay tuition and bills electronically.]
- Timely dissemination of information can be provided via N11.
- With N11 access, the government is essentially extending its services into the homes of the consumer as well as making its services available where public phones are available.
- Access to services is as easy as picking up the phone and dialing three numbers (N11). Consumers would need to be educated by public service information about how to find the information they need. With a menu of choices provided via N11 the consumer can select the correct information. N11 access can provide quick, one stop "where to obtain government services" such as food stamps, child care information, etc.
- Media owners such as newspapers, TV networks, radio stations, etc. could be given equitable access to provide services over N11 because the state would allow for a "fair playing field" among various information providers.
- With N11 there is the opportunity to minimize the duplication of state information activities. Information will be electronic based, thus decreasing the cost of printing government information.
- As use of N11 becomes universal, the cost of information dissemination becomes less as a result of standardized formats, etc.

- N11 can make it easy for citizen participation in government proceedings, hearing, etc.
- The public will be able to take advantage of the nation's information, communications networks, and computing technology resources.
- Economic development opportunities may increase as the access to government information is facilitated via N11.
- N11 services could be provided equitably and efficiently to the general public.
- Take advantage of existing and emerging standards for connectivity and interoperability.