nation's defense and emergency capabilities and to the quality of operations of the network. In a very real sense the CSO is charged with the responsibility for the protection of the high standards of the American telephone system. As long as it carries out that responsibility without discrimination or unfairness, it will have the Court's unwavering support.

High standards and high quality of operations are, of course, inseparably linked up with high quality personnel. The CSO and the Regional Companies evidently believe that they can attract such personnel more readily if the CSO uses the Bell name and marks. Since, as pointed out above, there are no countervailing considerations,[38/] it is appropriate under the decree that the CSO be enabled to make use of the Bell name and marks as requested. The Nynex motion is hereby granted.

VI

Further Briefing

First. On December 20, 1983, the Operating Companies filed a motion seeking a temporary waiver that would permit them to determine usage and to bill for intra-LATA 800 service on the basis of a state-wide statistical sampling of 800 calls. They claimed at the time that the existing data base system was incapable of screening and identifying 800 calls by LATA and that

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38/ However, nothing herein should be understood to authorize the CSO to provide services to telephone companies other than the Operating Companies, Cincinnati Bell, and the Southern New England Telephone Company. Compare Reply of Nynex at 4 n.3.

some interim arrangement was necessary to prevent disruption of service and unnecessary loss of revenue. On December 22, 1983, the Court granted the temporary waiver and approved the use of statistical sampling until April 3, 1984.

The original Operating Company motion foresaw the need for further interim arrangements beyond April 3, 1984, pending a modification of the data base system which would have the capability of screening and identifying intrastate 800 calls by LATA.[39/] Additionally, the Department of Justice, in its Memorandum of January 11, 1984, identified a number of issues to be considered with respect to such "new" interim arrangements.[40/] AT&T, for its part, claims that state commissions and Operating Companies have misinterpreted the temporary waiver in a variety of ways.[41/]

39/ The Operating Companies predicted that this could be achieved within eighteen months.

40/ Among the issues thus defined are (1) the scope of any new interim waiver, (2) the nature of the financial arrangements to be entered into by each Regional Company with AT&T; and (3) the duration of the new waiver.

41/ Thus, it is asserted that some state commissions and Operating Companies have suggested that the waiver authorizes the Operating Companies to be the sole providers of all intra-LATA 800 service jointly with AT&T under a division of revenue process. It is also claimed that Pacific Telephone and Telegraph Company and some other Operating Companies have improperly filed intrastate tariffs which prohibit AT&T from performing inter-LATA 800 functions by refusing 800 access lines to AT&T. Also involved in AT&T's submissions are concerns that the Operating Companies may be improperly seeking to achieve sole end-to-end responsibility for intra-LATA WATS service.

While there has been some briefing of these issues, it is apparent that an organized method for resolving the various issues surrounding the provision of 800 service must be established. Therefore, in accordance with the recommendations of several of the interested parties, a briefing schedule for 800 issues is hereby established as follows. AT&T and such Operating Companies as wish to comment shall file their views on the issues by February 13, 1984;[42/] the Department of Justice and any other interested party shall submit responsive comments not later than February 27, 1984; and replies to these responses may be filed by March 5, 1984. This schedule should permit the Court to consider the questions relating to the 800 service in advance of the current April 3, 1984 deadline.

Second. As the discussion under Part I supra shows, numerous adjustments have been requested to LATA boundaries, to the association of Bell and Independent territories, and to the reassignment of individual assets, and it may be expected that such requests will continue to be made in the future. It also appears that most of these requests are noncontroversial, and that they therefore unnecessarily take up the time of the Court and burden its docket. It is the intention of the Court to establish a procedure for channeling future requests along these lines to the Department of Justice, as follows.

42/ Any interested party which wishes to stand on the memoranda previously filed may, of course, do so.

Requests for the adjustment of individual LATA boundaries, for the association or disassociation of Independent areas to LATAs, and for the reassignment of individual assets, would be presented to the Department rather than to the Court. The Department would consider the matter, formally or informally with the requesting party, and if the Department concurred in the request, it would submit to the Court a proposal for an appropriate order. That order would be entered as the order of the Court unless an interested party[43/] filed an objection with the Court within ten days. In the event that an interested party filed a statement to the effect that it could not make a decision without a review of supporting materials, the entry of the order would be delayed for an additional ten days while the Department made available to such party the request for adjustment and other necessary explanatory material.[44/] If an objection were filed either within the ten or the twenty-day period, the Court would make the decision in accordance with the decree.

Any party or intervenor may object to or comment on the procedure proposed herein within fifteen days from the date of

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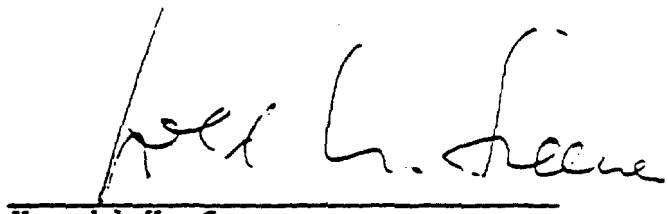
43/ I.e., AT&T, an Operating Company, or a party which had been afforded the right to intervene prior to January 1, 1984. Copies of the proposed order would be served by the Department on all such interested parties.

44/ Inasmuch as the Department now considers and comments on requests for waivers or modifications, the proposed procedures should not impose an undue additional burden upon it. Moreover, as the Court has previously noted, section VI of the decree contemplates that primary enforcement authority shall be vested in the Department of Justice.

this order; replies to the objections and comments may be filed within ten days thereafter; and the Court will then decide upon the issuance of an appropriate order.



Harold H. Greene
United States District Judge

Dated: February 6, 1984

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Civil Action No. 82-0192-HHG
	)	
WESTERN ELECTRIC COMPANY, INC., AND AMERICAN TELEPHONE AND TELEGRAPH COMPANY,	)	
	)	
Defendants.	)	

FILED

NOV 17 1988

CLERK, U.S. DISTRICT COURT
DISTRICT OF COLUMBIA

MOTION OF THE UNITED STATES FOR A WAIVER OF THE MODIFICATION OF FINAL JUDGMENT TO PERMIT THE BOCS TO PROVIDE MULTILATA 911 SERVICE

Pursuant to sections VII and VIII(C) of the Modification of Final Judgment, 1/ the United States moves the Court to grant a waiver allowing the BOCs to provide 911 emergency service across LATA boundaries. 2/

All of the BOCs provide 911 services that enable the public to reach emergency police, fire and medical assistance by

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1/ United States v. American Tel. and Tel. Co., 552 F. Supp. 131 (D.D.C. 1982), aff'd mem. sub nom. Maryland v. United States, 460 U.S. 1001 (1983).

2/ This Motion is filed in response to U S West's Request for Permission to Provide 911 Emergency Service to MultiLATA 911 Customers (October 25, 1988)("U S West Request"). Similar requests by other BOCs would raise no new competitive issues, however, and even the "me too" waiver procedure could result in some delay in the provision of new or improved 911 services. Accordingly, the Department recommends that the Court, in addition to allowing U S West to provide interLATA 911 services without geographic limitations, grant a waiver applicable to all of the BOCs.

dialing "911." The customers for 911 services are local governmental bodies that have public safety responsibilities. The jurisidictions of some 911 customers may include areas in more than one LATA, and section II(D)(1) of the decree prohibits the BOCs from providing interLATA 911 services without a waiver.

Recognizing the importance to the public of 911 service, the Court, in 1984, granted the motion of Ameritech and four other BOCs to provide E911 service, which constitutes an information service and therefore would be prohibited by the decree in the absence of a waiver. 3/ The BOCs' memorandum in support of that motion noted that "in no more than 35 to 40 mostly rural locations" the BOCs would provide 911 service across LATA boundaries, and requested a waiver of the decree's interexchange services prohibition "in those limited instances." 4/ Neither the Department's response in support of

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3/ United States v. Western Electric Co., No. 82-0192, slip op. at 2 (D.D.C. Feb. 6, 1984). The Department agrees with U S West that this order grants all the BOCs a "generic" waiver of the information services restriction to provide Enhanced 911 ("E911") service. E911 service includes a computerized data storage and retrieval system that is used to provide the caller's location and other stored data to the public safety officials.

4/ Memorandum in Support of Motion for Waivers and Declaratory Rulings, at 5 n.5 (Dec. 8, 1983).

the BOCs' motion for the E911 waiver 5/ nor the Court's memorandum granting that motion mentioned the interexchange aspect of the waiver request. In these circumstances, the Department submits, the Court's order should be construed as permitting the BOCs to continue then-existing interLATA 911 services, but we do not think that the record supports U S West's contention 6/ that the 1984 order granted a waiver covering all future interLATA 911 services.

Allowing the BOCs to provide interLATA 911 services, like allowing them to provide E911 services, however, is clearly in the public interest. It would allow consumers to reach providers of emergency services conveniently and efficiently. Moreover, BOC provision of this limited and specialized type of interLATA service does not present any threat to competition among interexchange service providers that would warrant denial under the VIII(C) standard. 7/ Indeed, the Department has received no comments objecting to the U S West request.

5/ Memorandum of the United States in Response to Pending Motions for Clarification and/or Waivers of the Decree's Provisions at 2-3 (Jan. 3, 1984).

6/ U S West Request at 3.

7/ Like time and weather services, 911 service is sui generis, and no inference can or should be drawn from this recommendation with regard to any other interexchange service. See United States v. Western Electric Co., No. 82-0192, slip op. at 6 (D.D.C. Feb. 8, 1988).

For the reasons set forth in this Motion and in the U S West request filed herewith, the Court should enter the attached proposed order granting the requested waiver for all of the BOCs.

Respectfully submitted,

Nancy C. Garrison, Assistant Chief

Michael F. Altschul, Attorney

Communications and Finance Section
Antitrust Division
United States Department of Justice
555 4th Street, N.W.
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(202) 272-4268

November 17, 1988

U S WEST, Inc.
7800 East Orchard Road, Suite 480
Englewood, Colorado 80111
303 793-6304

George Ann Harding
Vice President
Associate General Counsel

USWEST

October 25, 1988

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CLERK, U.S. DISTRICT COURT
DISTRICT OF COLUMBIA

Nancy C. Garrison, Esq.
Assistant Chief
Communications and Finance Section
Antitrust Division
U.S. Department of Justice
555 4th Street, N.W., Room 8106
Washington, D.C. 20001

Re: Request for Permission to Provide 911 Emergency Service to MultiLATA 911 Customers, United States v. Western Electric Co., No. 82-0192

Dear Ms. Garrison:

U S WEST, Inc., on behalf of its three operating companies,[1] requests the Department to recommend to the Court that it be granted relief from the interexchange services prohibition in Section II(D)(1) of the Decree so its operating companies can, using their own facilities, provide 911 emergency service across LATA boundaries in the 14 multiLATA counties listed in Attachment A. U S WEST further requests the Department to recommend to the Court that it issue a generic waiver so that U S WEST need not seek a similar waiver each time one of its operating companies is asked to provide 911 service to a 911 customer which resides in more than one LATA.

Background

911 service enables the public to dial "911" to reach easily and quickly emergency police, fire and medical assis-

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[1] The Mountain States Telephone and Telegraph Company, Northwestern Bell Telephone Company and Pacific Northwest Bell Telephone Company (collectively, "U S WEST").

tance. U S WEST's operating companies actually offer four different 911 services, which are described in Attachment B.

911 service is generally perceived to be a local service. It is provided pursuant to state exchange tariffs (or by contract where permitted by a state commission), and the 911 service area is confined to the political boundary of the 911 customer, generally a county or municipality.

For the most part, the LATAs are sufficiently large that no Decree issues are implicated when U S WEST provides 911 service. Nevertheless, there are instances in which the jurisdictional boundary of a 911 customer crosses a LATA boundary -- in which case 911 calls placed in one LATA will be directed to a Public Safety Answering Point ("PSAP") located in another LATA. See Figures 1 and 2. The provision of 911 service in these limited circumstances constitutes an interexchange service within Section II(D)(1) of the Decree.[2/]

U S WEST has about 60 multi-LATA counties in its 14-state, 27-LATA service area. As part of U S WEST's implementation of the pending Civil Enforcement Consent Order,[3/] it was recently discovered that there are 13 locations where U S WEST, since divestiture, has begun to provide 911 service within a county but across a LATA boundary. U S WEST has also been asked to provide county-wide 911 service in Park County, Colorado, which traverses two LATAs.[4/] These 14 locations are identified in Attachment A.

The Decree Court has already approved the provision of 911 service to multiLATA 911 customers. On February 6, 1984 the Court granted U S WEST (and others) a waiver so it could continue to provide 911 service. Although the principal focus of this waiver was the information services restriction in connection with the provision of E911 service, U S WEST (and the other petitioners) had also requested relief from the interexchange services restriction:

2/ 911 customers have difficulty understanding that their local telephone company, which provides telephone service to all county residents, may not transport a 911 call from one part of the county to another because the county is in two LATAs.

3/ See Motion and Stipulation for Entry of Civil Enforcement Consent Order (Nov. 20, 1987).

4/ U S WEST has previously submitted to the Department a waiver request concerning Park County. See Letter from Jeffrey Bork to Nancy Garrison (July 26, 1988). U S WEST wishes to consolidate that specific request so the Department can present to the Court a single motion addressing all 911 issues.

> [I]n no more than 35 to 40 mostly rural locations, the BOCs' provision of 911 service will require that some 911 calls placed in one LATA will be directed to a Public Safety Answering Point in another LATA.5/

At the time, U S WEST was providing multiLATA 911 service in two counties: Pine County, Minnesota (Minneapolis and Duluth LATAs); and Lewis County, Washington (Portland and Seattle LATAs).

It is not entirely clear from the record whether the Court's February 6, 1984 Order was generic in nature or whether it was limited in scope to the 911 services being offered at the time of divestiture. The request was so non-controversial that neither the Department nor anyone else addressed it in their responsive pleadings. Likewise, the Court did not specifically reference this particular request, providing simply that the BOCs may offer 911 emergency service. It is clear from the record, however, that the Court did not expressly limit the waiver to embedded 911 systems. It is also clear from the record that the information services waiver the Court granted was generic in scope.6/

U S WEST believes that the February 6, 1984 Order can be construed as granting all BOCs a generic waiver to provide multiLATA 911 service. Nevertheless, reasonable people may disagree with this conclusion. Accordingly, in the hope of expediting entry of the relief necesssary to provide this important public service, U S WEST submits this waiver request.

The Public Interest Would Be Served By Grant of a Waiver

The provision of 911 service, whether provided before or after post-divestiture, unquestionably furthers the public's welfare. In fact, the FCC has held that the provision of 911 service "directly promotes" the Congressional directive in Section 1 of the Communications Act of "promoting safety of life and property through the use of wire and radio communica-

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5/ Memorandum in Support of Motion for Waivers and Declaratory Rulings, at 5 n.5 (Dec. 9, 1983). See also Motion of Pacific Telephone and Nevada Bell for Clarification and Rulings, at 4 ¶ 4 (Dec. 14, 1983).

6/ There is, therefore, no need for U S WEST to seek a waiver of the information services restriction each time one of its operating companies installs a new E911 system.

tions."[7] The Court, too, stated in its February 6, 1984 Order approving the multiLATA 911 waiver requests before it:

> The Court finds that the relief requested by these motions will serve the public interest by avoiding expensive reconfigurations and unnecessary disruption of telephone service, will not endanger competition and is consistent with the purposes of the decree.[8]

The provision of multiLATA 911 service is of considerable importance to state and local governments. For example, on October 10, 1988 the Emergency Management Division of the State of Oregon conducted a meeting to "resolv[e] the problem which inter-LATA transport regulations create for 9-1-1 emergency telephone service":

> In Oregon, we have at least six such areas, two of which are significant enough in circuit cost alone to threaten the completion of our legislatively mandated implementation effort. The problem must be resolved. We anticipate everyone's cooperation in helping to identify a satisfactory solution.[9]

U S WEST's provision of multiLATA 911 service will necessarily be limited in scope to those few locations where the jurisdictional boundary of a potential 911 customer crosses a LATA boundary.[10] The provision of multiLATA 911 service in these locations will neither inhibit U S WEST's incentive to provide equal access nor otherwise undermine the purposes for the interexchange services restriction -- avoidance of discrimination and cross-subsidization.[11]

7/ CPE Used in Conjunction with 911 Service, ENF 84-44, Mimeo No. 1709, at ¶ 16 (Jan. 8, 1985).

8/ Memorandum of February 6, 1984, at 2.

9/ Notice of Meeting (Sept. 26, 1988)(emphasis in original). See Attachment C.

10/ At this time, there appear to be about 40 other locations in U S WEST's service area where U S WEST could be asked to provide multi-LATA 911 service. See Attachment D. All of these areas are rural, and the number of interLATA circuits needed to service these potential customers are few (e.g., generally two circuits per customer).

11/ See United States v. Western Electric Co., 569 F. Supp. 1057, 1100 n.187 (D.D.C. 1983).

U S WEST should, moreover, be permitted to use its own facilities in the provision of multi-LATA 911 service. 911 customers are interested in two things from their 911 service provider: emergency service that is reliable and inexpensive.12/ In those locations where U S WEST has inter-office facilities crossing the LATA boundary within the 911 service area (e.g., EAS situations), the most economical way to provide multiLATA 911 service is to use those U S WEST facilities. See Figure 3.

In many locations, however, U S WEST does not have any embedded facilities which directly cross the LATA boundary in the 911 service area. It is generally not economical to build such facilities given the small number of circuits required to provide 911 service. Consequently, in these locations a 911 call originating in the non-PSAP LATA must be routed to the access tandem switch serving the originating end office and transported to an access tandem switch in the PSAP LATA for delivery to the PSAP. See Figure 4.

Two types of facilities can be used to transport the 911 call from one U S WEST tandem switch to the other: U S WEST's official services network,13/ or circuits provided by a third party (e.g., an interexchange carrier) and obtained pursuant to tariff or other special contractual arrangement. If third party facilities are used, the 911 customer may deal directly with the third party (in which case, no Decree issues are implicated),14/ or U S WEST may act as an overall coordinator for the interLATA transport of the 911 services (in addition to the intraLATA transport) so the 911 customer need deal with only one carrier when troubles or outages occur.

U S WEST currently uses both types of facilities in its provision of 911 services. 911 customers often prefer U S WEST official services facilities because U S WEST can generally provide more reliable service and, at times, more economical interLATA transport.15/ Moreover, some 911 customers currently

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12/ 911 service, the FCC has stated, entails "extraordinary requirements for service continuity, reliability and maintenance." See note 7 supra. The cost for 911 service is, of course, paid by the 911 customer's citizens through taxes.

13/ Official services facilities may consist of U S WEST-owned facilities or facilities which U S WEST leases from others.

14/ See Memorandum Order dated June 28, 1985 (PNB/State of Oregon decision).

15/ For example, AT&T quoted to Park County, Colorado a monthly fee of $4,000 to lease two dedicated interLATA circuits
(Continued on page 6)

using interLATA facilities provided by a third party have asked U S WEST to instead use its own interLATA facilities.

The Decree Court has authorized BOCs to use their own facilities in transporting traffic across LATA boundaries in a variety of contexts.16/ For example, the extended area service and corridor exceptions to the interexchange services prohibition were approved in large measure to avoid increasing the costs of providing services that would occur by abandoning embedded BOC facilities in favor of third party facilities.17/ This rationale suggests that where U S WEST has embedded facilities that cross the LATA boundary intersecting a 911 service area, it may use such facilities in its provision of multiLATA 911 service.

Similarly, in its opinion addressing BOC official services, the Court held that it "makes no sense" to prohibit the BOCs from using, constructing and operating their own interLATA facilities in the conduct of their official services:

> Speed and reliability are critically important with respect to the BOCs' monitoring and con-

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15/ (Continued from page 5)
so U S WEST could provide 911 service in Park County. If U S WEST were to use its own official service network between its Denver and Colorado Springs tandem locations (facilities that are currently leased from AT&T pursuant to SNFA), it would be able to charge Park County only $300 monthly for two circuits. (The cheaper rate is possible because U S WEST obtains facilities from AT&T at a bulk rate and because U S WEST can base its rate using a "cost plus contribution" method.)

A monthly fee of even $300 is large for Park County which has only 6,000 residents. It is for this reason that Park County is considering the remote call forwarding option of B911 service. This latter option would not, of course, implicate the interexchange restriction of the Decree.

16/ The only situation where a BOC must use the interLATA facilities of a third party is in connection with mobile radio services. See United States v. Western Electric Co., 578 F. Supp. 643, 652 (D.D.C. 1983). However, the Court never analyzed the issue in that proceeding because the BOCs had agreed to lease all interLATA facilities. Id. at 651-52 and n.38. In fact, the Court held that the BOCs "may, of course, seek permission at a later date to construct their own inter-LATA transmission facilities for their mobile radio systems." Id. at 652 n.39.

17/ See United States v. Western Electric Co., 569 F. Supp. 990, 1002 n.54, 1018-19, 1023 (D.D.C. 1983).

> trolling of their switches and trunks. BOC operating personnel and computers must have continuous, instantaneous information regarding traffic loads and the operating state of equipment. When traffic overloads or equipment malfunctions occur, they must have the capability to immediately control equipment and reroute traffic. Forcing the BOCs to rely on third parties for official service communications . . . could seriously jeopardize the BOCs' fulfillment of their responsibilities to provide intra-LATA communications and exchange access.18/

U S WEST's transport of a 911 call from the caller to the PSAP is not an official service. Nevertheless, the reasons for allowing the BOCs to use their own interLATA facilities in connection with official services are equally (if not more) compelling when applied to the provision of 911 service. Speed and reliability are critically important in 911 service. If U S WEST is forced to use facilities provided by a third party, its ability to moniter quality and traffic loads and to provide continuous service is hampered. Among other things, down time may be encountered as U S WEST and the interLATA transport provider coordinate their effort to isolate and fix reported troubles or outages. Conversely, if U S WEST is allowed to use its own facilities, it can simply use different circuits during the investigation of any trouble. Simply put, forcing U S WEST to rely on third parties for the interLATA transport of 911 service could jeopardize the provision of reliable, and uninterrupted, 911 emergency service.

In summary, U S WEST asks the Department to recommend to the Court that it may provide multiLATA 911 services in the 14 locations listed in Attachment A and that it may use its own facilities in the interLATA transport of 911 calls.

The Department Should Recommend that the Court Issue a Generic Waiver

U S WEST has recently ascertained that it has about 60 multi-LATA counties in its 14-state, 27 LATA service area. See Attachment D. As evidenced by the Park County waiver U S WEST filed on July 26, 1988,19/ it is likely that U S WEST will be

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18/ United States v. Western Electric Co., 569 F. Supp. 1057, 1098, 1099 (D.D.C. 1983).

19/ See note 4 supra.

asked to provide 911 service to other multiLATA customers. U S WEST therefore recommends that, if a waiver is required, the Department present to the Court a generic waiver so that U S WEST need not request a waiver each time a new multiLATA 911 service order is placed. The Department's reasons for recommending to the Court that it issue a generic waiver in connection with multi-LATA paging services are equally applicable to 911 service: "Continuing this type of detailed judicial oversight for geographically incremented waivers would only burden the Court, the Department, and the BOCs and delay the provision of new and improved services."20/

Feel free to contact me or Jeff Bork in our Washington office (202-429-3122) if you have any questions concerning this request.

Sincerely,

cc: Michael F. Altschul, Esq.
Persons listed in the attached Service List

20/ Motion of the United States for a Waiver of Section II(D) of the Modification of Final Judgment to Permit Bell Operating Companies to Provide MultiLATA Paging Services, at 6 (Sept. 15, 1988).

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Figure: 1

Intra and interLATA E911 service (one of two variations).

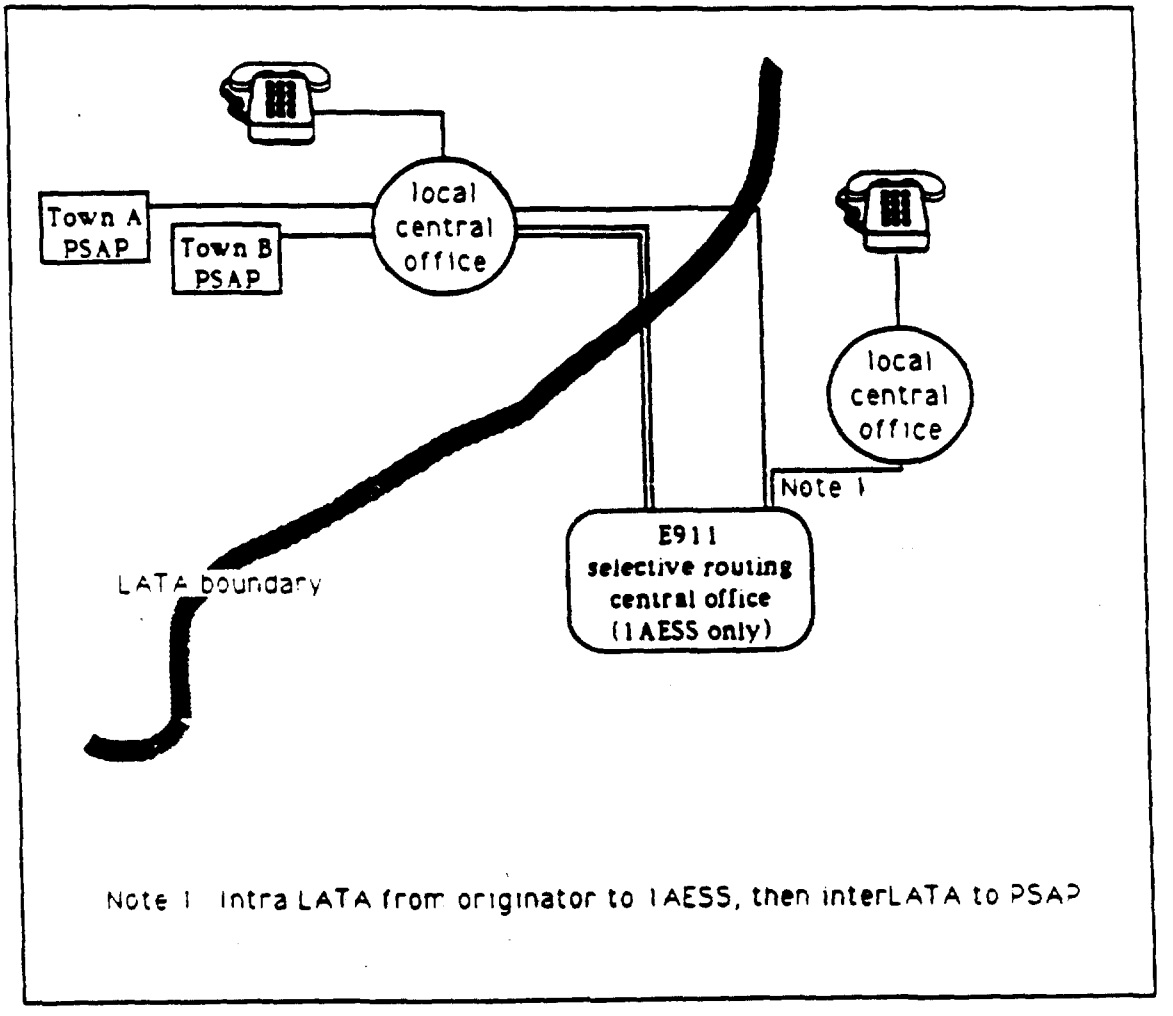

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Figure: 2

Intra and interLATA E911 service (second of two variations).

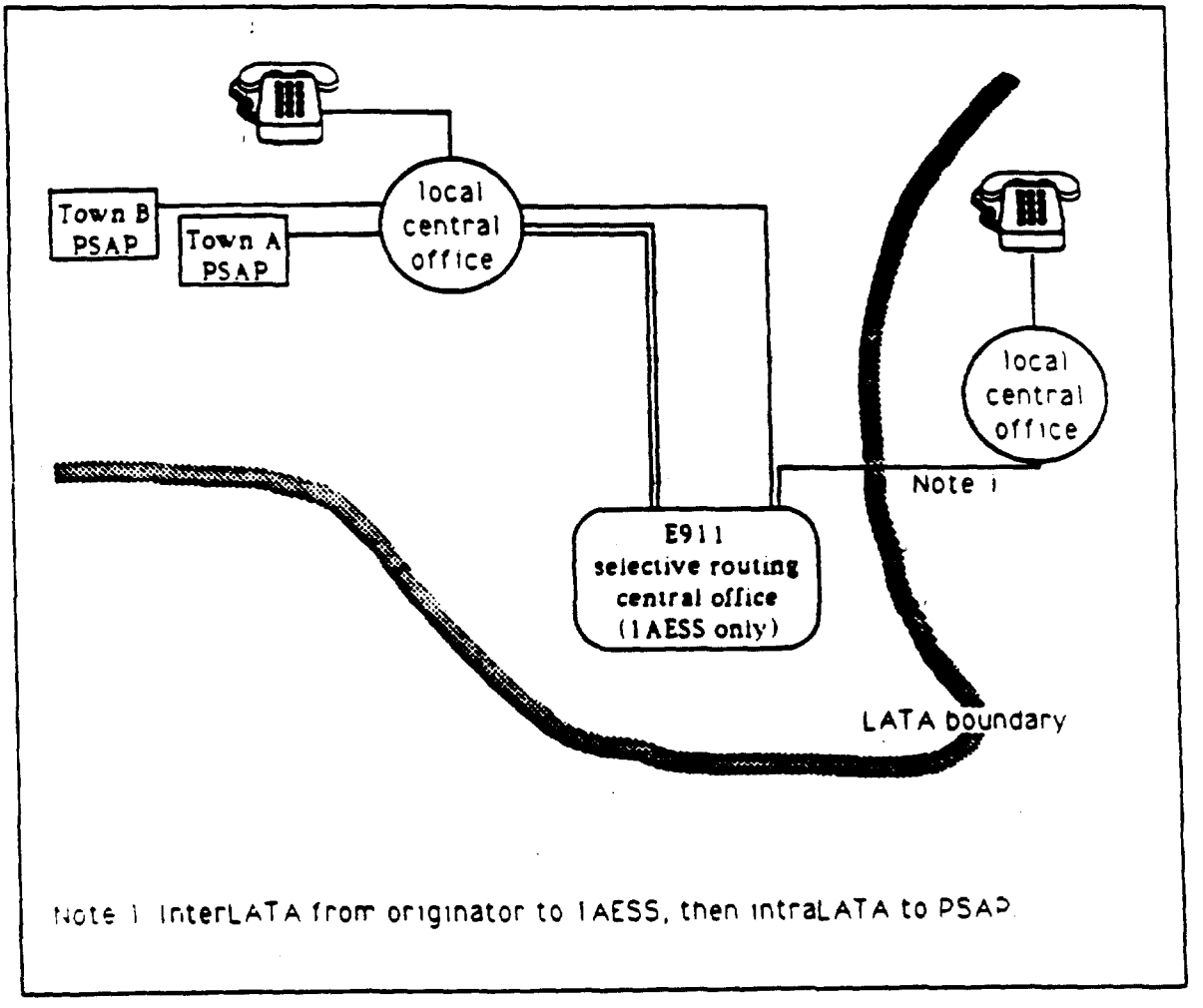

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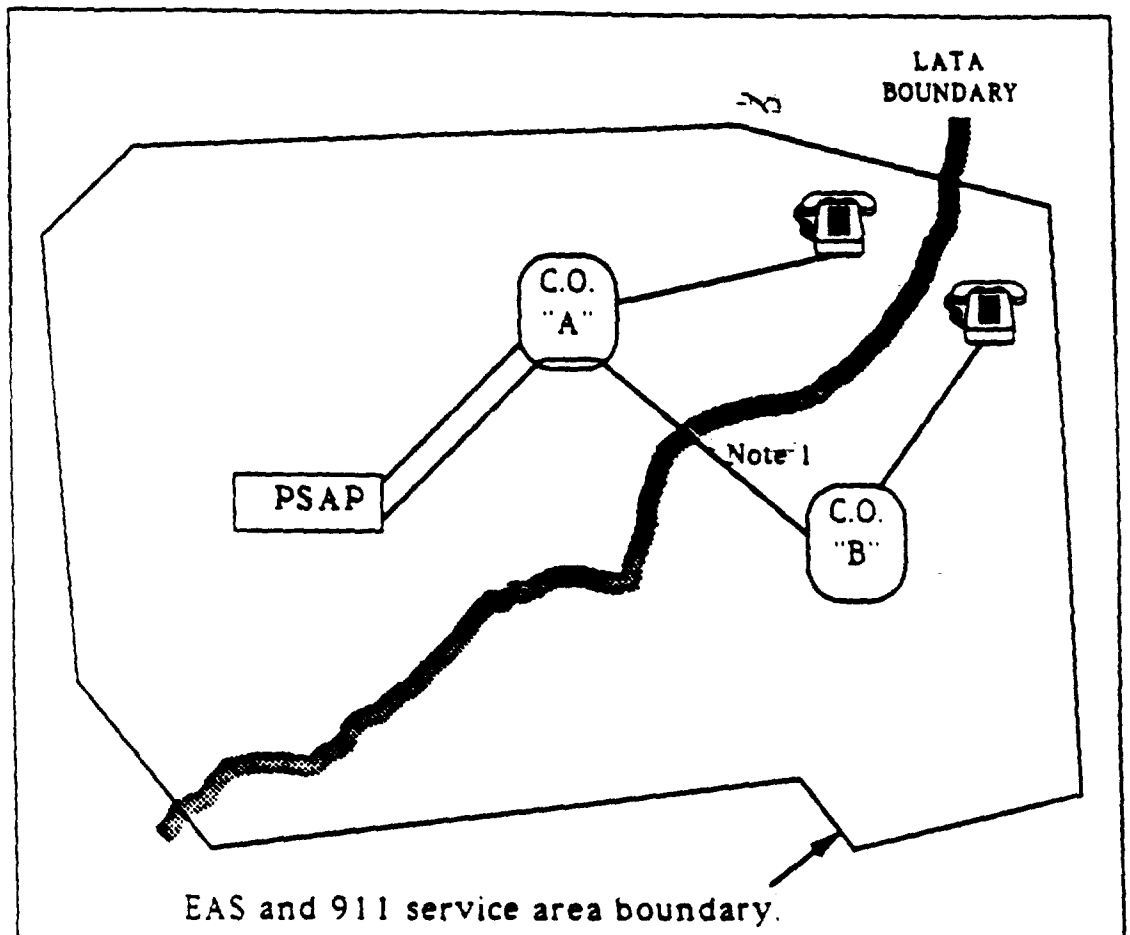
Figure: 3

911 in an "EAS" (Extended Area Service) area.



Note 1. These are embedded U S WEST facilities.

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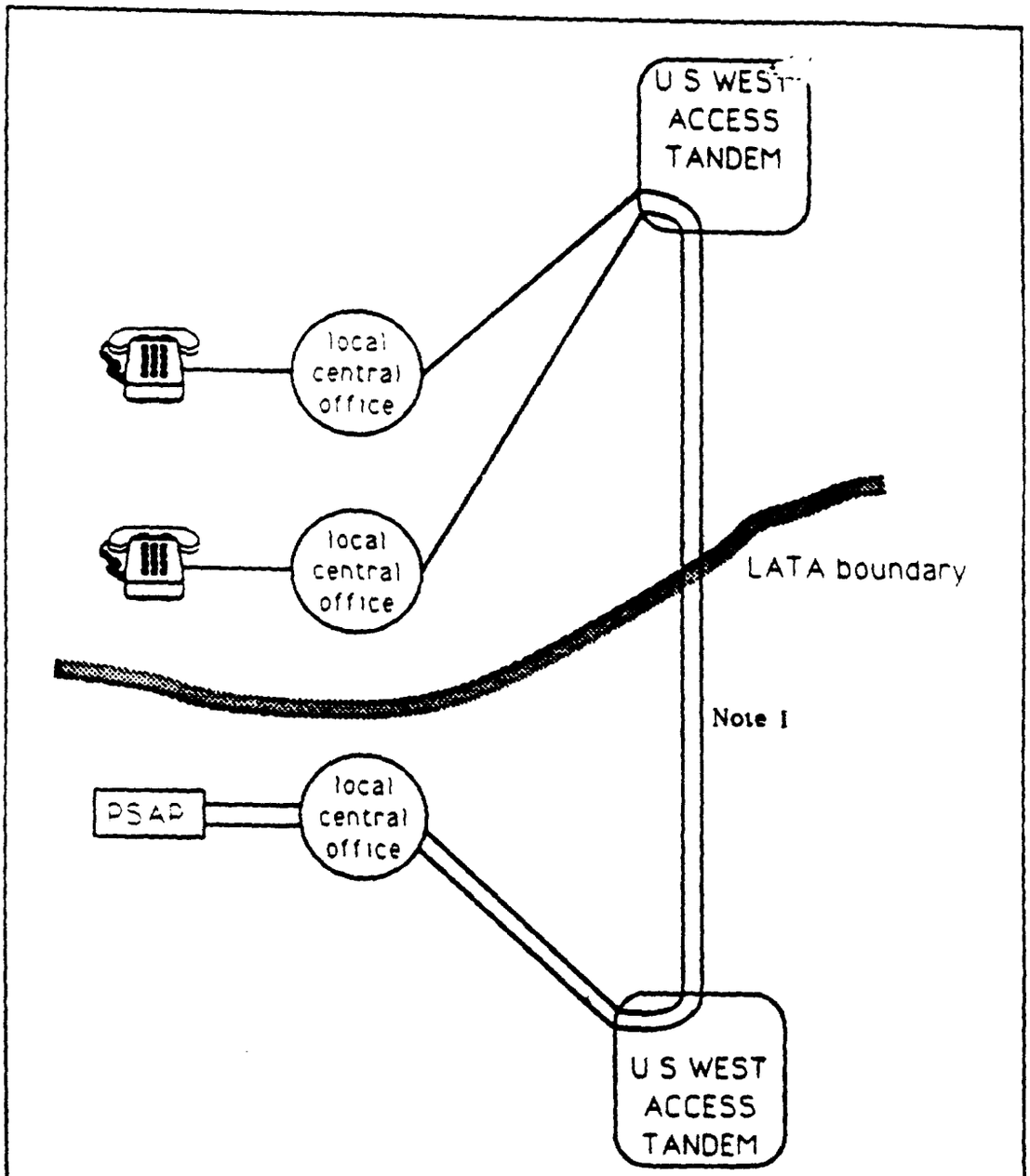
Figure: 4

InterLATA transport options.



Note 1: Two types of facilities can be used:
- U S WEST official company services interLATA facilities, or;
- Third party provider interLATA facilities.

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ATTACHMENT A

MULTILATA 911 SYSTEMS (14)

COUNTY	PSAP's LATA	OTHER LATA
Colorado (1)		
Park	Colorado Springs	Denver
Minnesota (13)		
Aitkin	Brainerd/Fargo	St. Cloud & Minneapolis
Crow Wing	St. Cloud	Minneapolis
Douglas	St. Cloud	Brainerd/Fargo
Goodhue	Minneapolis	Rochester
Koochiching	Duluth	Brainerd/Fargo
LeSueur	Minneapolis	Rochester
Mille Lacs	St. Cloud	Minneapolis
Morrison	St. Cloud	Brainerd/Fargo
Renville	St. Cloud	Rochester
Sherburne	Minneapolis	St. Cloud
Sibley	Minneapolis	St. Cloud
Wabasha	Minneapolis	Rochester
Yellow Medicine	St. Cloud	Rochester

U S WEST
October 25, 1988

Attachment B

Description of 911 Services

911 service enables the public to dial "911," without charge, to reach easily and quickly emergency police, fire and medical assistance. The potential customer base for 911 service consists of local governmental bodies (e.g., counties, cities) which are interested in providing 911 service to their citizens.1/

Introduced in 1968,2/ 911 service has evolved over the years to meet the public's need for emergency assistance. Originally, 911 service simply provided network call routing to a single Public Safety Answering Point ("PSAP") designated by

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1/ Indeed, U S WEST's tariffs specify that to obtain 911 services, "[t]he 911 customer must be legally authorized to subscribe to the service and have public safety responsibility by law to respond to public emergency calls within the telephone central office areas arranged for 911 calling." Mountain Bell, Utah Exchange and Network Services Tariff, § 9.2.1.A.2.

2/ A 1967 report by a Presidential Commission stated that "[w]herever practical a single [emergency] number should be established, at least within a metropolitan area and preferably over the entire United States." President's Commission on Law Enforcement and Administration of Justice, The Challenge of Crime in a Free Society 29 (1967). In January 1968, in response thereto, AT&T announced that the digits "911" would be available, as a matter of Bell System-wide policy, to serve as the universal emergency telephone number.

the 911 customer.[3] However, the size and complexity of the emergency services provided today by municipalities and counties have warranted the provision of additional features of 911 service to serve the public more effectively.

U S WEST today offers four different 911 services, each of which is described below.

1. Basic 911 (B911) Service

The original and most basic 911 service is B911. With B911 service, U S WEST reprograms its end office switches so that a calling party can reach a designated PSAP simply by dialing "911" instead of a seven-digit local telephone number. There are no features with B911 service other than abbreviated dialing.

Ordinarily, B911 service uses a "hard-wired" dedicated facility (or trunk) between the end offices in the 911 service area and the PSAP. However, 911 customers also have the option of using switched facilities to the PSAP in those locations where U S WEST can provide remote call forwarding.[4] The

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[3] While U S WEST may provide the CPE used by the PSAP attendant, the 911 customer decides where to locate the PSAP and staffs the 911 console.

[4] Call forwarding, which can be provided in most stored program controlled switches, permits a customer to have calls routed to a number different than the number dialed by the caller. In 911 service, a 911 call is routed to an end office switch equipped with call forwarding capability where the digits "911" are translated into the conventional telephone number of the PSAP.

advantage of the remote call forwarding option is cost savings: it is cheaper to use switched facilities and pay on a per-call basis rather than to use a dedicated ("private line") facility and pay a flat monthly fee regardless of use. The disadvantage of the call forwarding option is reliability: with use of switched facilities, the 911 customer may face a higher risk of blockage during very busy calling periods.

Figure B-1 reflects the networking alternatives for B911 service.

2. Custom 911 (C911) Service

C911 service, introduced in 1969, added the first feature to B911 service: "called party hold." With this feature, a PSAP attendant or dispatcher can hold the connection to the caller to assist in the manual tracing of the source of the call.

The provision of the "called party hold" feature requires the installation of a special trunk circuit board in each end office within the 911 service area. As a result, the only way in which this feature can be activiated is if the PSAP is connected directly to the distant end office via dedicated facilities. Put another way, the remote call forwarding option of B911 service is not available with C911 service.

The network configuration of C911 service is depicted in Figure B-2.