



P.O. BOX 1845 ABERDEEN, WA 98520

March 23, 2015

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

RE: 911 Governance and Accountability, PS Docket No. 14-193
And Improving 911 Reliability, PS Docket No. 13-75

Dear Ms. Dortch,

Grays Harbor Communications Center, E9-1-1 supports the recent comments filed by the Washington Utilities and Trade Commission (WUTC) in response to the Policy Statement and Notice of Proposed Rulemaking (NPRM) issued by the Federal Communications Commission in the above captioned proceedings.

During the statewide outage in April 2014 our agency was one of many that night that received no notification directly from the network provider over the six hour outage. It is a great concern that with the impending rollout of Next Generation 9-1-1 the responsibility for such notification could be lost even further due to the remoteness of the 3rd party providers. The contracted provider should be fully responsible for the basic level of notification when outages occur. They should not be allowed to re-allocate those responsibilities with sub-contracts they chose to strike in providing the service.

The citizens of our community depend on being able to reach public safety assistance 24x7 through the use of 9-1-1. When outages occur those same citizens need to be made aware of the outage so they themselves can make plans in case the need arises. Any delay in the notification process can impact lives.

In light of Washington's experience with the April 2014 multistate 911 outage, Grays Harbor Communications Center, E9-1-1 supports the Commission's proposed revisions to Rule 12.4 as a necessary means to improve accountability in the delivery of safe and reliable 911 services. Further Grays Harbor Communications Center, E9-1-1 is in agreement with the Commission and WUTC in respect to expanded certification requirements for all entities involved with critical aspects of safe and reliable 911 service, and expanding the range of network reliability practices that 911 service providers must address through the Commission's certification requirements.

Our community is concerned as well as interested in improving the current 9-1-1 system as technology changes we still need to have a system that we can trust to be there in our moment of need. Thank you for your diligence in ensuring as we move towards implementation of Next Generation 9-1-1, we don't forget to ensure that a robust system is utilized.

Sincerely,

Peggy Fouts, Director