

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
911 Governance and Accountability)	PS Docket No. 14-193
)	
Improving 911 Reliability)	PS Docket No. 13-75

COMMENTS OF THE KING COUNTY E911 PROGRAM

The King County E911 Program respectfully submits the following comments in response to the Policy Statement and Notice of Proposed Rulemaking (NPRM) issued by the Federal Communications Commission (Commission) in the above-captioned proceedings.

King County is the largest county in Washington State with a population of over 1.9 million people, which is 29% of the state’s population, and also makes it the 14th most populous county in the nation. The county includes the large urban city of Seattle, as well as suburban, rural, and mountainous areas. Enhanced 911 (E911) service is provided to the public through 12 Public Safety Answering Points (PSAPs). Of the 1.8 million 911 calls answered by the PSAPs in 2014, 76% of the calls were from wireless phones, 18% were from wireline phones, and 6% were VoIP calls. King County has been working to upgrade the E911 system to Next Generation 911 (NG911) technology since 2005, and several of the system components have been upgraded.

King County residents were impacted significantly by the April 10, 2014 outage of the Washington State Emergency Services Internet Protocol Network (ESInet). During the approximately eight hours of the 911 outage, 224 911 calls were delivered to the PSAPs in King County and 666 911 calls failed. We agree with the Commission’s statement that the public has

developed certain expectations with respect to the availability of E911 emergency services, and with the Commission's actions to ensure nationwide 911 reliability as technologies transition to NG911.

The following are King County's responses to NPRN questions:

Paragraph 38: The Commission states that many decisions regarding 911 are best made at the state and local level, and that continued oversight by states and localities is vital to ensuring that 911 service remains effective and reliable. King County agrees that 911 governance requires a strong partnership between the federal, state, and local levels. In Washington State, the Washington Utilities and Transportation Commission (WUTC) is actively involved in ensuring that telecommunications companies provide high quality 911 services, and has established reporting requirements for outages. Also at the state level, a State E911 Coordination Office has been established to coordinate and facilitate the implementation and operation of E911 service throughout the state. A statewide E911 Advisory Committee was created to advise and assist the State E911 Office, and the 39 counties throughout the state are represented on this committee. The counties are mandated by state law to provide 911 service countywide, and have strong local control over the operation of 911 service within their counties. This partnership between the federal, state, and county levels has been very effective in Washington State, and has enabled the implementation of E911 service for wireline, wireless, and VoIP statewide, and is now facilitating the statewide upgrade to NG911 technology. King County agrees with the WUTC comments that nothing in the NPRM should impede state commission or local governmental authority over reliable 911 service, and that federal efforts should assist, or complement, state and local governance efforts rather than act to supersede them.

Paragraph 42: King County agrees with the Commission’s proposal to expand the scope of entities covered by Rule 12.4’s definition of “covered 911 service provider” to include all entities that provide 911, E911, or NG911 capabilities, such as call routing, automatic location information (ALI), automatic number identification (ANI), location information servers (LIS), text-to-911, or the functional equivalent of those capabilities, regardless of whether they provide such capabilities under a direct contractual relationship with a PSAP or emergency authority. Significant portions of Washington State’s ESInet are provided by Intrado, a subcontractor to CenturyLink, and in the case of the April 10, 2014 outage, the failure occurred in an Intrado component of the network. All providers of any components in an E911 or NG911 system should be required to meet the certification requirements of Rule 12.4.

Paragraph 45: The Commission states that certification should indicate whether a service provider’s IP-based 911 architecture is geographically distributed, load-balanced, and capable of automatic reroutes to backup equipment in the event of a hardware, network, software, or database failure. In the April 10, 2014 outage, Washington State learned that our ESInet was not load-balanced to take advantage of the geographically distributed network components. In addition, 911 calls did not automatically reroute around the failed component to the network components that were still functional because the alarm generated by the failure was of such a low level that it did not trigger the automatic reroute. Therefore, King County supports the Commission’s proposed expansion of certification requirements. In addition, the Commission asks whether cybersecurity should be included in the requirements, and King County strongly encourages the Commission to do so. We have found that NG911 solutions proposed by vendors do not include cybersecurity that meets industry best practices, and have experienced significant delays in our progression to NG911 as a result.

Paragraph 46: The Commission states that Rule 12.4 should require certification with respect to the duty to take reasonable measures to share information and situational awareness during disruptions in 911 service. When the April 10, 2014 outage occurred, none of the PSAPs in King County were notified by CenturyLink or Intrado that there was a problem impacting the delivery of 911 calls. Individual PSAPs in King County were informed of the outage by the public reporting that their 911 call did not go through or by noticing the reduction in 911 call volumes. King County then initiated contact with CenturyLink. King County supports the Commission's proposal to include measures to share information with the PSAPs in Rule 12.4.

Paragraph 58: The Commission states that 911 service providers increasingly are building and operating regional and nationwide IP-based 911 networks that both extend across state boundaries and serve PSAPs in multiple states, using less well established technologies. King County is concerned that Intrado, the current provider of portions of the Washington State ESInet, uses only one ESInet with only two Call Routers to provide 911 service to all states nationwide. The National Emergency Number Association's concept of NG911 is a network of networks, in which regional ESInets connect to state ESInets that connect to a national ESInet. Washington State will require that future ESInet providers implement an ESInet in which these network components are located within the state. The Commission should consider rules that ensure that ESInets serve statewide or other logical areas that interconnect with other ESInets to form a nationwide network of networks, so that one ESInet failure will not impact multiple states, as was the case with the April 10, 2014 outage.

We would like to thank the Commission for your continued support of E911 and NG911 service, as demonstrated by this NPRM. We respectfully encourage the Commission to consider our comments related to 911 governance, accountability, and reliability.

Respectfully submitted,

KING COUNTY E911 PROGRAM



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