



Jackie Jones, President

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Commission's Secretary,
Office of the Secretary,
Federal Communications Commission

WC Docket No. 16-13 and Comp. Pol. File No. 1274

I am composing this response as an executive member of the WA State Chapter of APCO-NENA. Our chapter comprises of approximately 1400 members, made up of professional telecommunicators, supervisors, managers/directors, technicians, administrative personnel, and vendors in Washington State. The membership requested that I submit follow up comments as a member of the Executive Committee.

This is my second response, following personal contact by AT&T and in reading their additional comments to the original filing.

WA APCO-NENA is also opposed to AT&T discontinuing this service. We feel that their response is not comprehensive, and that they admit that they will have no newly available service to functionally replace what they are attempting to eliminate.

In this public notice, they are giving intent to no longer provide certain services including: Busy Line Interruption and Busy Line Verification. While we understand that land-line use is declining nation-wide, it still has significant use in rural areas, especially where cell coverage is less than optimal.

The ability for 911 telecommunicators to request BLI and BLV is of vital importance to providing full 911 services to our community. Our telecommunicators need to be able to access BLI and BLV in order to verify emergency information, re-gain contact when there is a 911 hang-up, and be able to interrupt someone on the phone when we have an emergency requiring us to make the attempt.

We would counter that perhaps they could keep the Busy Line Interruption and Busy Line Verification service and technology within the prevue of the 911 security services that we call when we need their assistance. It would seem that if the technology exists, there should be a way to move those abilities to the operators that they insist are available to 9-1-1 operators 24x7.



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We feel that the discontinuance of this service will negatively impact 9-1-1 across the “affected Service Areas” and should not be allowed to happen. We are also concerned that if AT&T is allowed to discontinue this service, then other phone service providers will promptly follow suit.

Thank you.

Karl Hatton
Executive Director,
Jeffcom 9-1-1 and Pencom 9-1-1
Westside Ambassador, WA APCO-NENA