

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

In the Matter of )  
 )  
The Use of N11 Codes and Other ) CC Docket No. 92-105  
Abbreviated Dialing Arrangements )

**REPLY COMMENTS OF Washington State Department of Transportation,  
PO Box 47300, Olympia, Washington 98504-7300**

The Washington State Department of Transportation (WSDOT) hereby submits its Reply Comments to the Comments filed to refresh the record regarding reconsideration of the Commission's designation of the 211 and 511 abbreviated dialing codes.

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WSDOT is charged with responsibility for state-level transportation systems within the state of Washington. Its mission is to efficiently build, maintain, operate, and promote safe and coordinated transportation systems to serve the public. WSDOT not only operates normally expected highway construction and maintenance functions on over 7,000 miles of state highways but also the nation's largest ferry system and is involved in all modes of transportation.

WSDOT has implemented a statewide 511 travel information system. The service originally started in 2002 with Cingular Wireless and Qwest Wireless providing access for their customers. By July 2003 every wireless phone company and almost every fixed line phone company in the state provided access (for a complete list of phone companies see the lists at the bottom of the web page at: <http://www.wsdot.wa.gov/traffic/511/> ) The 511 system is available to the six million people living and working and traveling in the state. The system provides real-time traffic congestion information, incidents and construction information, mountain pass information, phone numbers of every public transit agency in the state, phone numbers of every airline in the state, and direct connections to Washington State Ferries and the state of Oregon's 511 travel information system. WSDOT has spent over one million dollars of taxpayer money so far in starting and improving the 511 system. The work has been done by a combination of contracted businesses and government employees. WSDOT recently added a touch-tone option to the existing voice-only 511 system. Starting next week a consultant will assist WSDOT in improving the 511 system by convening a focus group and conducting usability testing. After that, both the voice-only part and the touch-tone part of the 511 system will be improved based on the results of the customer testing. Farther in the future, a personalized part of the 511 system is envisioned where customers who routinely call the 511 system for the same travel corridor information will be able to automatically get the information they desire, without going through the menu.

In Washington State, WSDOT was the only requestor for the 511 three-digit phone number.

WSDOT has coordinated with the adjacent states of Oregon and Idaho, plus the province of British Columbia in working to address 511 border issues. One area of special effort has been the Columbia River gorge. There are roads on both side of the Columbia River, with one road in Washington State and the other road in Oregon. A cell phone caller on one side of the river will probably get connected to a cell tower on the other side of the river due to line-of-site and cell tower coverage design. Consequently, Oregon and Washington States have been working cooperatively to tie the two state's 511 system together. Initially the connection will be a phone transfer. In the future, some data transfers are being planned.

WSDOT is well aware of citizens' needs for travel information. WSDOT maintains a complex Web site that provides lots of travel information. These Internet traffic maps receive about 1.5 million page views each day in the summer, with usage doubling in the winter. Meanwhile, use of the 511 system continues to increase as various publicity efforts occur. The WSDOT 511 system has been designed for a capacity of 144 simultaneous phone calls (with a peak call rate of 540,000 calls per month). Clearly, people want information to help them make the most safe and efficient choices for their trips. The availability of the 511 phone number has made travel information available to more people.

Assuming the business model of the wireless phone companies is tied to selling minutes of phone use (air-time), then the 511 systems being set up by various government agencies will make money for the wireless phone companies. In Washington State over half the calls to 511 are from cell phone users.

WSDOT believes the 511 system is very beneficial to every traveler. While only about a third of homes have Internet computer access, almost everyone in the state has a phone. The 511 system that the government provides is available to anyone with a phone. It is available free of charge to callers from fixed land-line phones (land-line phone service costs are regulated by federal and state governments), and is available at the normal per-minute rate to callers from mobile cell phones (cell phone service costs are not regulated by federal and state governments).

WSDOT has not experienced any of the issues identified by the Petitioners. Consequently, WSDOT does not support additional rulemaking at this time.

For further information please contact the WSDOT 511 Project Manager, Eldon L. Jacobson, at (206) 685-3187.