



# PACIFIC COUNTY SHERIFF'S OFFICE

## *Sheriff Scott L. Johnson*

Todd Fosse  
*Undersheriff*

Stephanie Fritts  
*911 & Emergency  
Management Director*

Pat Matlock  
*Chief Criminal Deputy*

Denise Rowlett  
*Chief Deputy*

June 3, 2014

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

RE: Comments Regarding the Washington State E9-1-1 Outage of April 10, 2014

Dear Ms. Dortch,

On the morning of Thursday, April 10, 2014 Pacific County Communications and other E9-1-1 centers in Washington State discovered that 911 lines were no longer functional largely by notification from the residential citizens who had been attempting contact. Further, as E9-1-1 centers in Washington State work closely together on a daily basis, additional contact and notification of the outage was initiated by telecommunicators dialing E9-1-1 center to E91-1-1 center via business lines. Testing of each area of responsibility ensued and it was quickly determined that the outage impact was statewide with the exception of two counties (Skamania County and Garfield County). Pacific County Communications immediately attempted to notify the network provider, CenturyLink, Network Operations Center.

The paragraph above is a simple summary of one portion of the eight hour E9-1-1 outage that demonstrates two serious concerns. The first was that CenturyLink and their contractor, Intrado, had no internal indication of an outage. Pacific County specifically contacted the CenturyLink Network Operations Center (NOC) which, after a 20 to 25 minute hold time, was unable to provide specific information about the issue(s). It is unknown how many Washington State E9-1-1 Centers called into the CenturyLink NOC by the time Pacific County reported however, by the time Pacific County reported, telecommunicators from Pacific County were aware of many (over six) counties that had also been affected. The number of counties reporting to the CenturyLink NOC should have triggered a significant alarm of some type. CenturyLink has subsequently stated that a call to the state service representative would have escalated the issue. This is not a workable solution, as one person cannot adequately manage communication with 60+ communications centers in the heat of the crisis. Washington State E9-1-1 Centers do not allow our telecommunicators to handle calls from 60+ individuals in crisis, all at the same time, nor do we expect CenturyLink to be able to adequately do so – either at the NOC or with the state service manager.

The problem that created the outage was identified, but pointed out clearly that true redundancy did not exist in the network as promised. The provision of true (not virtual) redundancy will be the best solution to the problem and will serve to negate the potential of future outages.

Following the resolution of the immediate problem, Washington State counties requested that service providers (wireline and wireless) provide lists of callers who attempted to dial 9-1-1 during the time of the outage and were unsuccessful in contacting 9-1-1. This information was delivered piecemeal and in some cases as much as ten days after the fact, or not at all. This level of service is unacceptable and applies to all providers of E9-1-1 telecommunications service.

Since the outage, E911 Directors and Coordinators from all Washington State counties (including those not impacted) have been working in concert with CenturyLink and Intrado. CenturyLink and Intrado have determined the cause of the outage and explained the issue in detail. The cause of the outage is important, and a short-term fix has been implemented with long term changes being planned. In retrospect however, the cause of the outage is no longer the primary concern, but the issues of awareness, notification, and follow-up continue.

Pacific County Communications urges the FCC to consider the following in terms of the providers and contractors responsible for E9-1-1 service:

1. E9-1-1 failure awareness
2. E9-1-1 failure escalation criteria
3. E91-1- failure notice to served centers/areas
4. Redundancy in network provision
5. No single point of failure
6. Short turn-around of information requested following an outage
7. Follow-up to those who attempted to dial 9-1-1

Being among the first first responders, Pacific County Communications is seriously concerned and committed to reaching a final resolution regarding the cause of the outage, and to establish enhanced working relationships with the providers of the E9-1-1 network. Communication with the vendor, the state, and with other Washington State E9-1-1 centers will continue until such time as all questions are answered and/or resolved. The primary interest is in ensuring the E9-1-1 network is fully redundant with no single point of failure.

Sincerely,

Scott L. Johnson  
SHERIFF

A handwritten signature in black ink, appearing to read "Stephanie Fritts". The signature is stylized with a large, sweeping initial "S" and a long horizontal stroke at the end.

Stephanie Fritts  
Director