



## THURSTON 9-1-1 COMMUNICATIONS

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July 2, 2014

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

RE: Inquiry into Circumstances of Major 911 Outage Centered in Washington State on April 9-10, 2014, *PS Docket No. 14-72*

Ms. Dortch:

On April 10, 2014 at approximately 01:00 in the morning the 911 system in Washington State was incapacitated. Thurston 9-1-1 Communications (TCOMM911 serving for Thurston County including the State Capitol) offers the following comments for the Commission's consideration in this matter:

1. The outage notification procedure/process was not initiated by CenturyLink or Intrado as it should have been. Outage notifications flowed from PSAP to PSAP, from PSAP to State E911 Office and from PSAP to CenturyLink and Intrado.
2. The network/database failure type did not generate a warning of significant value to require an immediate response from the Network Operations Center (NOC). The alert associated with causative factor for this near state-wide outage was a low-level warning, which in retrospect was not sufficient given the level of importance of the event to public safety.
3. Failover systems that manage the ESInet routing at CenturyLink and Intrado at the Colorado selective router failed to work as designed, negating the long time assurances by CenturyLink that this essential services network had NO single points of failure.

TCOMM911 was able to route local 911 calls from the local CO via POTS lines which restored service by effectively routing Basic 9-1-1 outside of the MPLS ESInet. Even

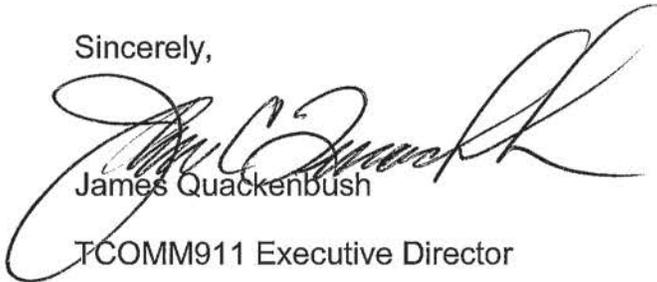
when there was direct communication between local PSAPs and the NOC there was a refusal by Intrado to manually enable the failover procedure.

4. TCOMM911 went to great lengths to determine how many 911 calls were made and not answered during the outage. Any dropped call or missed call known to the center required a call back and contact to determine if there was still an emergency response need. PSAPs rely on the carriers to provide the data necessary to perform the follow up after a system-wide 911 outage. Delivery of actionable data to the PSAPs was not timely by any carrier. The first actionable data was received over 10 days following the event, and one carrier, Sprint, refused to provide any data on failed calls for follow up.

#### Summary

The 911 system has been in operation since 1970 in Washington State and there has never been a 911 system outage of this magnitude before. This event has heightened awareness at all levels in the system particularly as the nation's PSAPs are migrating to Next Generation 9-1-1 systems. Efforts underway by the vendors, the FCC, and State Utility regulators must result in system improvements so public safety is not compromised as it was in this outage.

Sincerely,

A handwritten signature in black ink, appearing to read 'James Quackenbush', is written over the typed name.

James Quackenbush

TCOMM911 Executive Director