

## **APPENDIX C**

### **List of Issues and Questions**

#### **Questions for Local Exchange Carriers (LECs) regarding their business customers:**

1. How do you define business customers as distinguished from residential customers? How do you classify voice communication services provisioned to assisted living facilities, shared tenant service providers, college dormitories, and other end-user premises that are primarily residential in nature?
2. Do your Interconnection Agreements with AT&T California and/or Verizon California include terms and provisions that require you to provide E9-1-1 service to all your customers including business customers?
3. Is there any difference in your cost to provision E9-1-1 service to residential as opposed to business customers, and if so, what are the differences?
4. Please refer to your most recent CPUC Annual Report Table III or FCC Form M Schedule S-3 -- Access Lines in Service by Customer, and identify the number of access lines provided separately to business and residential customers within California? Do any of the lines reported as Special Access Lines (Non-Switched in Table III columns (fj) (fk)) or reported as Local Private Switch Lines ( in Table III in column (fm)) include circuits that allow an end-user to dial 9-1-1?

#### **Questions for LECs regarding E9-1-1 for MLTS:**

1. Do you offer a Private Switch Automatic Location Identification (PS/ALI) service, and if so is it tariffed?

2. For a hypothetical MLTS customer located 20 miles from the selective router, what are your current tariff rates for non-recurring and monthly charges for the provisioning of PS/ ALI service?
3. Do you offer a tariffed or detariffed Centrex or hosted MLTS service, and if so, what are the current service descriptions and rates for the provisioning of E9-1-1 service identifying the tariff and sheet numbers, or the Product Guide, page number and web site location?
4. Do you offer PS/ ALI service to business customers through contracts filed with the CPUC? To what extent are PS/ ALI service elements offered under reduced or waived rates?
5. Do all of your Central Offices or local switches support ISDN/PRI circuit connectivity for business customers who wish to order PS/ ALI service?
6. Do you require a MLTS operator/owner to get approval from the local 9-1-1 county coordinator before implementing PS/ ALI service?
7. Do you offer a hosted IP-Centrex comparable service, and if so what are the current service description and rates for the provisioning of E9-1-1 service?
8. Please identify any other states where you or an affiliate provides local exchange service, which have adopted legislation that includes a MLTS E9-1-1 requirement?
9. What party is responsible for maintaining accurate and current E9-1-1 MLTS station locations and validating the PS/ ALI location information against the Master Street Address Guide (MSAG) - the business owner, the equipment manufacturer or a third party vendor?

10. Are there Telecommunications Industry Association, Alliance for Telecommunications Industry Solutions or any other Industry or National Reliability and Interoperability Council (NRIC) Best Practices applicable to the provisioning of E9-1-1 for legacy and IP-based MLTS?
11. Please provide any market research or competitor information that you or any affiliate possess which identifies LECs, CLECs and VoIP service providers offering MLTS services in California, identifies the installed base and number of telephone station by each MLTS type and/or technology within California, identifies MLTS equipment manufacturers that provide E9-1-1-capability, or third party vendors offering MLTS E9-1-1-software and hardware.

**Questions for all interested Parties regarding business customers:**

1. Are there any counties or localities within California where E9-1-1 service is not available?
2. Besides call centers which are provisioned for inward calling only and without the ability to dial an outside line, are there other types of business lines that should be exempt from the requirement to provide E9-1-1?
3. Are there any California, county or local fire codes or employee health and safety ordinances that address the responsibility of business owners on informing and educating employees or tenants on how to dial 9-1-1, or addresses how employees or tenants are to communicate location information - cubicle, floor, building, retail space - to police, fire or other emergency personnel responding to a 9-1-1 emergency?

**Questions for all commenting Parties regarding MLTS:**

1. How many MLTS E9-1-1 solution service providers are there in the market? Is there a trade association that represents third parties that provide E9-1-1 solutions for MLTS? Is there a published list of these third parties?
2. What information is available that provides information on the cost of MLTS E9-1-1 solutions provided by third parties?
3. In the six and half years since the 2003 FCC's Report and Order (FCC 03-290), have the major MLTS equipment manufacturers made E9-1-1 a standard or optional built-in feature? Is this feature available at no extra charge? If not, what is the cost to add and/or activate it?
4. What has been the typical replacement cycle for the different types of premise-based traditional and IP-based MLTS equipment since 2003?
5. What information should business owners provide to employees or tenants about dialing 9-1-1 and providing location information to first responders in an MLTS environment?
6. Are there any businesses that are exempt from California or Local Fire Codes that require business owners to display floor space diagrams or evacuation maps that identify emergency exits? Can these floor diagrams or maps be used as a template to designate Emergency Response Location Zones (ERLZ) -- identifying telephone station locations within an E9-1-1 MLTS solution? Can using these already existing floor maps have the effect of lowering the business owner's administrative burden of complying with an E9-1-1 MLTS requirement?

7. Do the following arrangements provide an acceptable alternative to E9-1-1 for MLTS?
  - a. Military bases, nuclear power plants or colleges with on-site emergency responders?
  - b. MLTS systems with direct lines to PSAPs?
  - c. MLTS systems that switch a 9-1-1 call to an on-site 24/7 attendant who takes on the role of coordinating with emergency responders?
  - d. MLTS systems serving remote buildings or sites that switch a 9-1-1 call to a local business line serving that location?
  - e. Others?
8. What should be the minimum number of business days for updating MLTS PS/ALI location information for station adds, moves and other change activity?
9. For employers with offices or remote employees working in one of the fifteen states with E9-1-1 requirements for MLTS, will there be a lower incremental cost to expand E9-1-1 solutions to their employees working in California since the corporate planning and administration and necessary software systems and protocols are already in place to conform to the requirements of the other states?
10. What is the E9-1-1 solution in those cases where a MLTS network includes branch offices and locations served by more than one PSAP or in more than one NPA/NXX?
11. When an IP-based MLTS operator/manager updates his PS/ALI location, is that information validated against the MSAG?

12. With VoIP or IP-based MLTS, who will have the duty to require the E9-1-1 solution for MLTS end-users: the VoIP service provider that provides the dial tone, the Voice Position Center that routes the 9-1-1 call, the CLEC that provisions the 9-1-1 trunks and delivers the 9-1-1 call to the selective router, or the LEC that provides the numbering resources?
13. To what extent do MLTS equipment manufacturer recommend that IP circuits not be utilized for dialing 9-1-1, but that end-users should use traditional TDM circuits for access to 9-1-1?
14. Should the Legislature adopt the E9-1-1 MLTS Model Legislation proposed by NENA and APCO?
15. Can the existing ILEC PS/ALI service be improved in a way that reduces costs to the business owner implementing on E-9-1-1 solution for MLTS?
16. Are there any other issues that should be addressed in this proceeding?

**(END OF APPENDIX C)**