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**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking to Improve Public Safety by Determining Methods for Implementing Enhanced 9-1-1 Services for Business Customers and for Multi-line Telephone System Users.

Rulemaking 10-04-011  
(Filed April 8, 2010)

**ADMINISTRATIVE LAW JUDGE'S RULING  
SEEKING COMMENTS**

This ruling directs each of the parties in the above-entitled proceeding who provide 9-1-1 services to business customers and multi-line telephone system users in the State of California (Utilities) to file additional comments responsive to the below questions by September 30, 2011. This ruling also directs AT&T to file additional comments responsive to concerns and issues raised in the attached letter dated August 3, 2011 from the County of Orange. (See Attachment 1).

**IT IS RULED** that:

1. By or before September 30, 2011, each utility shall file a comment responding to the following questions:
  - a. Do you charge your customers provisioned with primary rate interface integrated services digital network<sup>1</sup> (PRI

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<sup>1</sup> PRI ISDN is the equivalent of a T1 circuit at total signaling speed of 1.544 Mbps in support of 24 channels, Newton's Telecom Dictionary.

- ISDN) trunks additional charges to pass through the automatic number identification (ANI) from a public branch exchange (PBX) on a 9-1-1 calls? If so, what is the rate and what are the associated installation and recurring costs?
- b. Do you charge any type of optional upgrade fees relating to allowing the calling party number of the station to be sent to the Enhanced-911 (E9-1-1) database rather than the billed telephone number?
  - c. Do you have rates in tariffs or service guides applying specifically to PRI ISDN trunks for the service of allowing the PBX phone station ANI to be sent to the E9-1-1 database rather than the billed telephone number of the trunk?
2. By or before September 30, 2011, AT&T shall additionally file a comment responding to the following questions:
- a. As posed by the County of Orange in the attached letter dated August 3, 2011, does the CALNET 2 contract specifically require the signees exclusivity to the providers? If so, which provision or provisions require(s) such exclusivity?
  - b. As posed by the County of Orange in the attached letter dated August 3, 2011, as the contract holder and service provider, do you charge termination or other fees to customers for switching to another service provider? If so, under what circumstances would such fees be assessed?
  - c. Does AT&T have any further or clarifying comments responsive to the comments and concerns set forth in the attached letter from the County of Orange.

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Dated September 15, 2011, at San Francisco, California.

/s/ KIMBERLY H. KIM  
Kimberly H. Kim  
Administrative Law Judge

# **ATTACHMENT 1**

**Rebuttal to AT&T Comments on  
ALJ Ruling found in Section III.  
Staff Requests for Comments and Staff Directives**



*County Executive Office*  
*Information Technology*  
**Telephone Services Division**

DATE: 3 Aug 2011  
TO: Michael Aguilar  
Policy Analysis Branch, Communications Division, California Public  
Utilities Commission  
FROM: Max Ralsten, RCDD  
CEO/IT - Telephone Services Division, County of Orange  
SUBJECT: Rebuttal to AT&T Comments on ALJ Ruling found in Section III.  
Staff Requests for Comments and Staff Directives

In reference to AT&T's argument regarding the Inform 911 charges I would like to point out that, as stated in the workshop, The County of Orange is a subscriber to the CALNET 2 contract and as such is limited to the choices available for 911 delivery services. According to the AT&T response "Customers are free to choose from a large number of competitors in this highly competitive space". Unfortunately the CALNET 2 contract has specific requirements of its signees and rights of exclusivity to the providers. If the contract holder, i.e. AT&T, can provide the services the customer requires then going to another provider of the same service violates the contract subjecting the subscriber to termination or higher fees. This is how it has been explained to the County, if this is in error, it would be appreciated to see the correction in writing.

AT&T references in their response the availability of CAMA trunks as an option for 911 service delivery. CAMA trunks were originally designed to provide ANI (Automatic Number Identification) for billing purposes. This type of facility has been in use for several decades and would be considered a 'legacy technology'. It seems rather strange that with today's advances in communications technology that any provider would suggest their customers use such an antiquated service. AT&T states that CAMA trunks are a tariffed service, however they are not available on the CALNET 2 contract thus resulting in higher fees. AT&T further states that "AT&T offers other, tariffed options for customers who want to balance the cost of such service with the necessity of

providing local PSAPs with accurate location information". CAMA costs don't really fit in a 'balanced' cost model.

The tariffed price for the installation of a single CAMA trunk is \$744.73 with a monthly recurring cost of \$74.09. If the County were to install one CAMA trunk at each of our 40 PBX locations it would have cost taxpayers \$29,789.20 for the installation and \$2,963.60 every month. With this configuration only **one** person would be able to place an emergency call from any given County location at a time. If a catastrophic event, large scale emergency, or a widespread disturbance took place, multiple victims or reporting parties would be prevented from contacting emergency services. This is not an acceptable situation either in the level of service available or the cost.

The design used by the County, a single PRI circuit, allows for up to 23 simultaneous 911 calls from either a single site or as an aggregate total number of calls from multiple locations within our network. The installation cost for this PRI trunk was approximately \$2,387.00 with monthly recurring costs running around \$332.00. These amounts do not include the \$142.00 installation, \$147.00 database setup fee or the monthly \$140.00 Inform 911 charges.

Even if the County had configured 23 CAMA trunks in lieu of PRI, the installation would have been \$17,128.79 vs. the PRI installation of \$2,387, a difference of \$14,741. In addition there are the Monthly Recurring charges of \$1,704.00 for CAMA vs. the \$472.00 the County pays for the PRI with Inform 911. Even with the Inform 911 charges the County realizes a \$14,784 annual savings over CAMA. It is obvious that CAMA is not only a non-preferred technology but it is not a cost effective alternative either.

The last point to be addressed is the claim that "PRI ISDN allows customers to allocate network resources in accordance with their business strategy. The service is not restricted to 911 call routing". That is precisely why the County implemented a PRI circuit for its 911 service in addition to PRI circuits that have been installed at other County facilities. Multiple PRI trunks at multiple locations to manage call flow and provide uninterrupted network service in case of localized failures.

PRI ISDN circuits allow Caller ID (CLID) to pass over the PSTN and provide a display of the ANI and/or Name information. This display can be from County initiated calls to the PSTN or those received by the County telephone network

from the public. Many home and almost all cellular telephones have this ability, the County simply wanted to extend this feature to its employees and citizens. AT&T currently levies separate monthly charges for ANI and Name display capability for calls traversing a PRI trunk group.

The interesting thing about this is AT&T's claim that "...the PRI ISDN "Inform 911" service is not essential -...". Well the fact of the matter is that even with the monthly charges for ANI & Name info that are passed to the PSTN on every non-emergency call, when a caller USING THE SAME PRI FACILITY dials "9-1-1" the ANI is suppressed unless the customer (MLTS owner) is ALSO paying the Inform 911 charge. Now the question is, why is ANI data blocked by the carrier for 911 calls when the same information is provided for POTS calls? Customers are charged for the initial database setup programming for the PS/ALI system and installation of "Inform 911".

An MLTS owner/operator would consider these charges to be reasonable and acceptable if these charges are to establish a customer's numbering plan in the carrier's PS/ALI system along with the routing of 911 calls to the Tandem Office/Selective Router. The question is why does AT&T invoke an additional monthly charge to allow ANI info to be passed through to the PSAP? It is our understanding that Government agencies provide significant subsidies for carriers who maintain the PS/ALI database and 911 calling systems. What is the justification for the additional charges to deliver ANI info to this system?

This may sound a bit repetitive but the concept must be made perfectly clear: If an MLTS owner/operator pays the required monthly charges, ANI data is passed across the PSTN on all non-emergency calls however, this same info is blocked when a call is placed to Emergency Services unless the customer pays the additional 'Inform 911' monthly service charge. WHY? ANI delivery is already in place, the customer is charged to send their ANI information across the PSTN, the technology works for non-emergency calls, why is there an additional charge to allow this information to be displayed when calls are placed to Emergency Services?

MLTS owner/operators already pay numerous fees and charges to connect to the PSTN. It seems that if MLTS owners and operators must pay to have their ANI information displayed across the PSTN in non-emergency situations, it is only reasonable to expect this same information will be displayed for Emergency Calls without additional fees. In this time of Government budget problems and

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business slowdown, it seems irresponsible to require any MLTS owner to be double billed for the ANI service based upon the destination of the call, a PSAP.

Respectfully submitted,

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**(END ATTACHMENT 1)**