

Resolution on Private Switch Automatic Location Identification

WHEREAS, There have been numerous examples in recent years where emergency vehicles were dispatched to the main location of a private switch rather than to the location of the person needing the emergency assistance, causing unnecessary delays and sometimes loss of life; and

WHEREAS, When a calling party dials "9-1-1" from a station behind a private switch, such as a Private Branch Exchange (PBX) or a Shared Tenant Service (STS) arrangement, the Automatic Number Identification (ANI) or a combination of ANI and Automatic Location Identification (ALI) information that is sent to the Public Safety Answering Point (PSAP) is that of the main telephone number and address of the private switch, which is not necessarily the telephone number and location from which the call originated; and

WHEREAS, This is a particular problem in the following situations: with PBXs utilized by school districts that serve an entire district with off-premises extensions; with STS arrangements serving apartment complexes where the PBX is in the manager's office; in multi-building office parks where the PBX is in a central location; and in a campus environment where the PBX is in the Administration Building; and

WHEREAS, The telecommunications industry is currently working with public safety agencies and private switch owners to develop a solution to this situation; whereby, a private switch would forward the exact telephone number and location from which a telephone call to "9-1-1" for emergency assistance was made; and

WHEREAS, The Oregon Public Utility Commission, the Utah Public Service Commission, the Colorado Public Utilities Commission and the Washington Utilities and Transportation Commission have already approved tariffs to allow private switch owners to be directly or indirectly connected to PSAPs in order to forward the specific ANI and ALI information from which a telephone call to "9-1-1" was placed; and

WHEREAS, On December 29, 1992, the FCC established a thirty day comment period regarding the request for rulemaking by Adcomm Engineering Company (RM-8143) to amend Part 68 Rules to include technical standards for PS ALI; now, therefore, be it

RESOLVED, By the Executive Committee of the National Association of Regulatory Utility Commissioners (NARUC), convened at its Winter Meeting in Washington, D.C., that NARUC believes that there is a need for technical standards for PS ALI; and be it further

RESOLVED, That the NARUC supports FCC Rules to permit states to adopt additional technical standards and/or more stringent rules for PS ALI; and be it further

RESOLVED, That the NARUC General Counsel will enter comments concerning NARUC's position regarding the need to amend Part 68 for technical standards for PS ALI in RM-8143 with the FCC and will distribute this resolution for consideration.

Sponsored by the Committee on Communications
Adopted March 4, 1993
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**Resolution Relating to the
Telecommunications Service Priority System**

WHEREAS, In 1988 the Federal Communications Commission (FCC) ordered the replacement of its Restoration Priority System with the Telecommunications Service Priority (TSP) System in General Docket No. 87-505; and

WHEREAS, Qualified users may subscribe to the TSP System, allowing designated circuits to be placed "at the top of the list" for repairs or provisioning in the event of a national security emergency; and

WHEREAS, The FCC established the TSP System Oversight Committee to identify and review any problems developing in the system and recommend actions to correct them or prevent recurrence, and the committee has identified critical issues that directly affect state utility regulation; and

WHEREAS, Carriers were ordered to file tariffs in compliance with the TSP plan, and the FCC's Order allows carriers to charge for restoral activities; and

WHEREAS, State and local public officials have expressed concerns about the prohibitive cost of TSP subscription and the potential for preemption of restoral activities for critical emergency services, and significant differences in tariffs and charges among various carriers and states; and

WHEREAS, The Chairman of the TSP Oversight Committee has recently informed the National Association of Regulatory Utility Commissioners (NARUC) of concerns surrounding the TSP System, and has solicited the NARUC's insight on how these concerns might be resolved; and

WHEREAS, Many state regulatory agencies approved the intrastate TSP tariffs of telephone carriers at a time when the details of the TSP System were not clear, and state and local concerns had not been expressed; and

WHEREAS, A number of factors including the cost of TSP System subscription and uncertainty about the benefits of subscribership have kept the number of TSP subscribers far short of projections; and

WHEREAS, All priorities established under the Restoration Priority System will expire on March 10, 1993, at the end of the thirty month transition period; now, therefore, be it

RESOLVED, That the Executive Committee of the National Association of Regulatory Utility Commissioners (NARUC), convened at its Winter Meeting in Washington, D.C., alerts its members that concerns have been raised about TSP Service issues, and that its members may wish to reevaluate the tarified provisions and charges for the service; and be it further

RESOLVED, That the NARUC commit necessary membership and staff resources to work with the TSP Oversight Committee to resolve continuing concerns on these critical issues identified by that committee.

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