

BEFORE THE NEBRASKA PUBLIC SERVICE COMMISSION

In the Matter of the Commission,)
on its own motion, seeking to)
investigate the requirements,) Application No. 911-045/
costs and impact of the) PI-166
implementation of Next)
Generation 911 in Nebraska)
relating to the provision of)
Enhanced Wireless 911 Service.)

QWEST CORPORATION'S INITIAL COMMENTS

Qwest Corporation ("Qwest"), in accordance with the Nebraska Public Service Commission's ("Commission" or "PSC") Order Opening Docket and Seeking Comment, entered June 2, 2010, respectfully submits the following comments. The Commission posed seven numbered questions for comment, and Qwest repeats each question prior to its comments.

1. Please provide information regarding the necessary statewide wireless and landline network elements and specifications for the development of an Emergency Services IP Network (ESInet) necessary for the implementation of Next Gen 9-1-1.

a. Should a statewide network be established or should regional ESInets be coordinated.

Qwest comment: An Emergency Services IP Network (ESInet) deployed on a statewide scale facilitates earlier deployment, consistent design applications and economies of scale. Regional ESInets expose the state to the potential for disparity between a variety of processes, including (but not limited to): Service Level Agreements, response times, redundancy, monitoring, expertise of techs, and service quality.

b. To what extent are these components currently in place?

Qwest comment: Qwest has not done an analysis of the components in place throughout Nebraska, but consistent with the national recommendations, all of the elements required to establish an ESInet are commercially available and could be deployed, based on the needs and requirements defined for a statewide system.

c. What upgrades in the statewide telephonic and broadband network are needed, if any?

Qwest comment: The ESInet envisioned by Qwest leverages existing infrastructure for the migration from a legacy analog-based circuit switched 9-1-1 network to an IP-based packet switched Next Generation 9-1-1 infrastructure.

d. What costs may be incurred to establish or upgrade the necessary networks?

Qwest comment: An ESInet introduces many more variables in design consideration than the legacy 9-1-1 network. Much of the cost will be driven by the specific design requirements that have not yet been developed. A significant consideration will be the level of physical diversity required where it does not exist today, focusing on the last mile and access to the PSAP.

Qwest believes that once an ESInet's full potential is achieved there will be an overall reduction in operational costs and the ESInet can then be leveraged to support other public safety communications and bandwidth requirements. Without knowledge of the eventual design requirements, Qwest's rough estimate indicates a statewide ESInet with the supporting call routing and ALI retrieval will increase the PSAP spend by a minimum of three times what it is today.

e. What costs may be attributable to the provision of wireless enhanced 9-1-1 services?

Qwest comment: An ESInet's cost does not differentiate between the call origination type; therefore, the cost attributed to wireless should be equivalent to the ratio of the number of wireless calls versus wireline calls received by the PSAP.

2. At the individual public safety answering point (PSAP) level, what equipment, software and network elements are necessary for the implementation and operation of Next Gen 9-1-1?

a. To what extent are the PSAPs properly equipped?

Qwest comment: Depending on the network provider's capability, various modifications may be required at the PSAP. With a Qwest solution a PSAP that is Enhanced 9-1-1 today will be able to fully participate with the Next Generation ESInet with the simple installation of a PSAP Gateway Module (PGM). Installed at the PSAP demark, the PGM serves multiple functions to assure a PSAP equipped with legacy 9-1-1 CPE will fully function on the Qwest NG 9-1-1 Network.

b. What upgrades may be necessary for individual PSAP equipment and software or network infrastructure to the PSAP?

Qwest comment: Every PSAP will be required to accept 9-1-1 calls in an IP format, while their current PSAP equipment is configured for an analog protocol. An integral component of the Qwest solution is its ability to manage the protocol conversions from analog to IP, and it eliminates the need for costly equipment upgrades until the PSAP is ready to retire the hardware and software supporting the agency today.

c. What costs may be incurred to properly equip PSAPs and their respective networks?

Qwest comment: At some point in the future every PSAP will be required to upgrade their equipment to support the exciting new data content functionality Next Generation 9-1-1 anticipates. In many network providers' solutions, costly upgrades will be required to simply deliver the existing voice and Automatic Location Identification (ALI). The Qwest solution realizes the need to expand as the features and functionalities become available. Qwest's pricing model includes all of the elements for a PSAP to migrate to a Qwest iQ MPLS backbone without having to shift from their existing equipment before it is required.

d. What training may be necessary to ensure proper handling of increased information available through Next Gen 9-1-1?

Qwest comment: This is a question best answered by the PSAPs who will be able to properly assess their current skill sets. Qwest recognizes that Next Generation 9-1-1 will be a change, and with change proper education is required. Qwest will provide the appropriate feature and functionality training to PSAP personnel for PSAPs purchasing the Qwest solution.

e. How may smaller PSAPs be uniquely affected?

Qwest comment: Smaller PSAPs may be uniquely affected due to the resources available to them to manage the internal demand a technology migration may introduce. Large or small, the Qwest solution is scalable to meet the needs of any sized PSAP.

f. What costs may be attributable to the provision of wireless enhanced 9-1-1 services?

Qwest comment: Please see Qwest's answer to question 1 e.

3. In implementing Next Gen 9-1-1, what 9-1-1 data bases will be required?

Qwest comment: There are a multitude of databases in i3. Qwest is working with National Emergency Number Association (NENA), Alliance for Telecommunications

Industry Solutions (ATIS), and the Emergency Services Interconnection Forum (ESIF) in developing the i3 recommendations and standards.

a. In what way will Next Gen 9-1-1 affect the existing Master Street Address Guide; and

Qwest comment: The Legacy MSAG database's are housed and updated in a tabular fashion. In NG9-1-1 the data will come from several data sources. As in E9-1-1 today, the concept of civic address validation will continue to be used for NG9-1-1. The functions of ANI, ALI, and MSAG will be replaced by GIS databases and Location Validation Function (LVF).

The location information will be provided after the GIS data is validated. This information will be used in routing emergency calls to the appropriate PSAP. These elements, along with the PSAP's URL, will work together to form the Emergency Call Routing Function (ECRF).

b. Who will be responsible for creating and maintaining the various data bases required?

Qwest comment: Qwest is working with National Emergency Number Association (NENA), Alliance for Telecommunications Industry Solutions (ATIS), and the Emergency Services Interconnection Forum (ESIF) in developing the i3 recommendations and standards.

4. Please comment regarding the appropriate state or local authorities to direct and coordinate the implementation of Next Gen 9-1-1 with respect to the receiving and processing of 9-1-1 calls. In commenting please also provide the following:

a. The basis for their authority;

Qwest comment: Qwest believes that the basis for the appropriate state or local authority to direct and coordinate implementation of NG9-1-1 is found in Neb. Rev. Stat. § 86-410, *et seq.*

b. Funding available to the entity; and

Qwest comment: Please see answer to 4 a. above.

c. The level of technical expertise needed and currently available.

Qwest comment: This is a question better directed to the PSAPs and the governing bodies.

5. Please comment regarding the various funding sources that may be available for the implementation of Next Gen 9-1-1?

Qwest comment: Please see answer to 4 a. above.

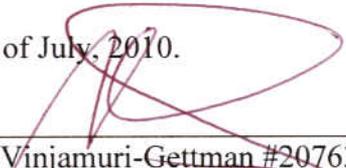
6. Please comment regarding any statutory changes that may be necessary to implement Next Gen 9-1-1.

Qwest comment: Qwest is unaware of any statutory changes which would be required for PSAPs to adopt the Qwest solution.

7. Please comment as to any other issues that should be addressed related to the implementation, coordination, and funding for the implementation of Next Gen 9-1-1.

Qwest comment: Qwest has no further comments to offer at this time, but reserves its rights to bring other issues to the Commission's attention as this proceeding moves forward.

Respectfully Submitted this 30th day of July, 2010.

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