

BEFORE THE NEBRASKA PUBLIC SERVICE COMMISSION

<p>In the Matter of the Commission, on its own motion, seeking to conduct a study to examine issues surrounding the statewide implementation of Next Generation 911 funded through the Enhanced Wireless 911 Fund as required by LB 595 [2013].</p>	<p style="text-align: center;">Application No. 911-058/PI-188</p>
<p style="text-align: center;">COMMENTS OF QWEST CORPORATION d/b/a CenturyLink QC and UNITED TELEPHONE COMPANY OF THE WEST d/b/a CENTURYLINK</p>	

On January 31, 2014 the Nebraska Public Service Commission (“Commission”) received the initial report of its consultants, Mission Critical Partners, on the status of the current 9-1-1 system in Nebraska and the implementation of Next Generation 9-1-1. On February 3, 2014, the Commission released the report and requested interested parties to file comments by February 18, 2014. Qwest Corporation d/b/a CenturyLink QC and United Telephone of the West d/b/a CenturyLink (collectively “CenturyLink”) appreciate the Commission’s efforts to move the state towards Next Generation 9-1-1 service, but were disappointed that the initial report overlooked important information that CenturyLink had provided Mission Critical Partners regarding its 9-1-1 network and its ability to provide specific services. CenturyLink respectfully provides these comments to draw the Commission’s attention to these oversights.

Section 4.1.1. – Fiber Optics. In this section, Mission Critical Partners states that “[t]here is one consortium of seven incumbent local exchange carriers (ILECs) that not only coordinates the extensive network of its members, but also has inter-connection agreements with almost every LEC in the state[.]” This statement implies that only this

consortium has a fiber optic network capable of supporting Next Generation 9-1-1 service. CenturyLink also has extensive multi faceted network offerings that include not only fiber based facilities that support fiber to the premise, but also a multi protocol suite of offerings including MPLS and Metro Ethernet. The access and network can be built to allow dual redundancy as well as support quality of service elements across the entire State of Nebraska. CenturyLink can offer multiple access port profiles on fiber ranging from 5MB to 10GB and support 100GB backbone transport.

Section 4.1 – 911 Call Routing. The report states, “CenturyLink operates six selective routers: Council Bluffs and Sioux City, Iowa; and Grand Island, Norfolk and Scottsbluff, Nebraska. Windstream operates one selective router in Lincoln, Nebraska.” CenturyLink notes that it currently provides the majority of the 9-1-1 call selective routing within the state. CenturyLink currently supports 624,000 E9-1-1 Records in Nebraska in its Automatic Location Information (ALI) databases for both wireline and wireless for routing instruction for its former Qwest service territory as well as for the former Embarq service territory.

Section 4.2 – Network Management Solutions. The report simply states, “The Office of the Chief Information Officer (OCIO) sets network standards and guidelines, but has no rule-making authority. They perform a Network Operations Center (NOC) function for state networks, and provide performance statistics and outage reports.” CenturyLink notes that it is a proven provider of 9-1-1 service. CenturyLink is currently delivering world class 9-1-1 network solutions, reliability, and technical expertise to its customers, including EM/ES trunk design; provisioning, test, and turn up; maintenance,

surveillance and repair; technical project management; ALI database services; and 9-1-1 data reconciliations. CenturyLink currently provides 9-1-1 ALI Database and Selective Router service in thirty states covering over 26 million telephone numbers.

Section 5 Findings – 9-1-1 Operations. Mission Critical Partners notes in its report that “[t]o provide equal services to Nebraska citizens, no matter where in the state they are, the ability to understand and implement i3 services at the level of expectations documented by NENA, APCO and federal organizations will entail lots of changes in operations.” The report goes on to state, “Connectivity and 9-1-1 in-bound call services vary significantly across the state; in some remote areas in northern and eastern Nebraska, service providers do not provide reliable service or redundancy and resiliency options. “ CenturyLink is a proven carrier providing Next Generation 9-1-1 ESINet services at the state, region, and local level. CenturyLink is currently providing state-wide ESINet services in Washington and Minnesota. In addition, CenturyLink is providing region-level, county-level, and local-level ESINets in Utah and North Carolina.

Section 5.1 Call Handling. CenturyLink sells, supports and services much of the equipment listed in Table 4 of the Mission Critical Partners report, including VIPER, Cassidian Pallas, PlantCML Rescue Star, Plant MAARs, and CML 1000. CenturyLink is a Platinum Partner with Intrado and has enjoyed a reseller relationship with Intrado and its predecessor company, Positron, for over three decades. CenturyLink has installed thousands of Intrado systems throughout the United States and is consistently one of Intrado’s top sellers, which is indicative of the strength and longevity of this partnership. In addition, CenturyLink is a Preferred Partner with Cassidian. CenturyLink has enjoyed

a reseller relationship with Cassidian and its predecessor companies, Plant and CML, for over three decades. As with the Intrado systems, CenturyLink has installed thousands of Cassidian systems throughout the United States and is consistently one of Cassidian's top sellers, which is indicative of the strength and longevity of this partnership.

Section 5.4 Management Information Systems (MIS). Mission Critical Partners states in its report, "As PSAPs move to NG9-1-1 successful use of MIS systems becomes imperative. The state of Nebraska has a couple of ways this can be addressed. One way would be to require that NG9-1-1 call handling systems meet MIS requirements for accurate and easy to use reports. Another option is for the state of Nebraska to use a software as a service (SaaS) solution such as ECATS." CenturyLink is a current partner with ECats and can provide support and assistance to the Commission in this area.

Section 6.1 Network Facilities and Services. The report states that "Nebraska has a wealth of fiber optic transport and access facilities. NebraskaLink handles large-scale sales and service for their members' networks and has interconnection agreements with other LECs around the state. Presently, they are interconnected with all LECs operating in the state except for one. The only reason that one is not connected to the is *[sic]* that there has been no economic reason to do so. When or if that changes, they will interconnect. A second provider who was not connected to NebraskaLink is in the process of connecting to one of its members." As noted in response to Section 4.1.1, CenturyLink has extensive multi faceted network offerings that include both fiber based facilities that support fiber to the premise and a multi protocol suite of offerings including MPLS and Metro Ethernet. The access and network can be built to allow dual redundancy as well as support quality of service elements across the entire State of Nebraska. CenturyLink also offers multiple access

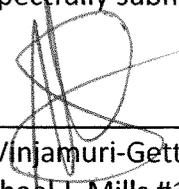
port profiles on fiber ranging from 5MB to 10GB and support 100GB backbone transport. Also, as CenturyLink noted in response to Section 5, it has provided a statewide ESINet to the states of Washington and Minnesota. CenturyLink has also provided regional, county, and local ESINet services for North Carolina and Utah.

Section 7 NG9-1-1 Requirements. Again, CenturyLink is currently providing ESINets for several states and PSAPs (please see the response to Section 5 and Section 6.1 above). Importantly, CenturyLink supports all currently approved NENA Standards.

CenturyLink appreciates the Commission's interest in Next Generation 9-1-1 services to ensure Nebraska citizens have timely access to emergency services and in the work Mission Critical Partners has accomplished with this initial report. CenturyLink has significant expertise in the provisioning and Next Generation 9-1-1 services, having provisioned ESINets to the states of Washington and Minnesota and to several PSAPS in North Carolina and Utah. CenturyLink would like to work more closely with both the Commission and Mission Critical Partners to explain the expertise and services CenturyLink can provide.

Dated February 18, 2014.

Respectfully submitted,

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