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NEBRASKA PUBLIC SERVICE COMMISSION

BEFORE THE NEBRASKA PUBLIC SERVICE COMMISSION

In the Matter of the Nebraska Public Service Commission, on its Own Motion, to investigate the status of direct access to emergency services	Application No. C-4767/911-062/PI-194

INITIAL COMMENTS OF QWEST CORPORATION d/b/a CENTURYLINK QC and UNITED TELEPHONE COMPANY OF THE WEST d/b/a CENTURYLINK

On June 16, 2015 the Nebraska Public Service Commission ("Commission") opened the above referenced docket to investigate the ability of users of Multi-line Telephone Systems ("MLTS"), such as those used in hotels, hospitals, office buildings, and university campuses, to have direct access to 9-1-1. The Commission expresses concern that Americans have been trained to dial 9-1-1 in emergency situations, but may not know, or remember in the heat and panic of an emergency, to dial another digit to obtain an outside line. And it states that in an emergency situation every second counts, and losing time trying to get an outside line may mean the difference between life and death.

The Commission asks a number of questions regarding direct access of 9-1-1 and requests comment on those issues. Qwest Corporation d/b/a CenturyLink QC and United Telephone Company of the West d/b/a CenturyLink (collectively, "CenturyLink") respectfully provide these responses to the Commission's questions.

1. **Are you familiar with any public places where accessing an outside line before dialing 9-1-1 to reach emergency services is required? If so, how is the general public notified? If yes, is there a technical impairment to providing the ability to directly access emergency services through 9-1-1?**

CenturyLink is unsure what the Commission means when it refers to "public places." CenturyLink is aware that phones may be available in parks, parking garages, and university campuses where the public may access emergency service. However, CenturyLink does not know whether a caller must access an outside line to call 9-1-1 on these phones.

2. **Are you familiar with any offices, hotels or other multi-story buildings where accessing an outside line before dialing 9-1-1 to reach emergency services is required? If so, how are the employees or residents notified?**

CenturyLink can only speak to the office buildings in Nebraska that it owns or leases that have MLTS. In the buildings that CenturyLink occupies in Omaha, callers must dial 9 to access an outside line before dialing 9-1-1. Employees are told of the requirement to dial 9 through the Fire, Life, and Safety information that is provided to each employee. In addition, each warden, assistant warden, searcher, or manager is aware of the need to access an outside line before dialing 9-1-1. Currently there is no obligation in Nebraska to notify employees or residents of a need access an outside line before dialing 9-1-1.

3. **Are you involved in or aware of any ongoing efforts to resolve the issue of dialing 9-1-1 from a MLTS? If yes, please provide a detailed description.**

The FCC initiated a comment cycle several years ago inquiring about state actions to achieve E9-1-1 deployment in MLTSs. In addition, CenturyLink is aware that legislation has been introduced and passed in Texas, Illinois, and Maryland that require direct access to 9-1-1 from MLTS.

4. **Are MLTSs programmable to include both 9-1-1 and X-9-1-1 dialing? Please explain why or why not?**

Depending on the CPE equipment used, MLTSs are, for the most part, programmable to include both 9-1-1 and X-9-1-1 dialing. The programming may be different depending on whether the system is a PBX or VoIP system. Many MLTSs being deployed today have direct access to 9-1-1 as the default setting.

5. **What costs are associated with programming MLTSs to allow for direct access to emergency services through 9-1-1 dialing?**

CenturyLink will charge a small fee to reprogram an MLTS system to allow for direct access to emergency services through 9-1-1 dialing when the MLTS system was purchased through CenturyLink. In addition, the default setting on many new MLTS systems is to allow for direct access to 9-1-11.

6. **Does the Commission have the authority to require direct 9-1-1 access to emergency service? If not, why not? If so, please explain.**

The issue of requiring MLTSs to have direct access to 9-1-1 dialing appears to have been pushed to the states; however CenturyLink believes that the proper audience for these questions is the private businesses that own the MLTS systems in question. The Commission does not have the authority over these businesses in how their systems are programmed.

Public awareness is the key. Employees, hotel guests, and residents should be informed by the operator of the MLTS if an outside line needs to be accessed before dialing 9-1-1. In addition, there

needs to be a partnership between the PBX vendor, end user, and service provider to ensure that 9-1-1 issues, such as direct access to 9-1-1, are resolved. CenturyLink's managed phone solution is designed to handle these issues with ease. The next steps are for end users to get in contact with their PBX vendor and carrier to make sure that they have a plan, test it, and keep location registries up to date.

Dated July 13, 2015

Respectfully submitted on behalf of
QWEST CORPORATION d/b/a CENTURYLINK QC and
UNITED TELEPHONE COMPANY OF THE WEST d/b/a
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 13th day of July, 2015, a true and correct copy of the foregoing was delivered to the following:

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