

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

**COMMENTS OF
CITIZENS TELECOMMUNICATIONS COMPANY OF NEBRASKA
D/B/A FRONTIER COMMUNICATIONS OF NEBRASKA**

In its June 16, 2015 *Order Opening Docket, Seeking Comment, and Setting Workshop*, the Nebraska Public Service Commission ("Commission") opened this docket to "examine the status of direct access to emergency services from Multi-line Telephone Systems (MLTS)", and asked several questions regarding MLTS in Nebraska. Citizens Telecommunications Company of Nebraska, Inc. ("Frontier") files the following Comments in response to the order's questions.

As a preliminary point, MLTS is provided using Customer Premises Equipment ("CPE"), which can be obtained by the customer from a number of sources beyond Frontier. Frontier can provide this type of CPE to its customers, but so can many other vendors. The provision of CPE is not regulated by the Commission. Frontier, as a local exchange carrier, is not in a position to control the way that its local service customers program or operate their CPE. The capabilities of CPE vary by manufacturer, and Frontier is not well versed on the capabilities of all available CPE available for sale or which may be in service.

Questions for Public Comment

1. Are you familiar with any public places where accessing an outside line before dialing 9-1-1 to reach emergency services is required?

There are many internal telephone systems (generally business locations) nationwide that require an "8" or "9" to be dialed to access the second dial tone of the serving central office. If these systems had a telephone in the lobby or at the door for access into the building, those locations could be considered public locations.

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If so, how is the general public notified?

Normally by the placement of a placard on which dialing instructions are provided.

If yes, is there a technical impairment to providing the ability to directly access emergency services through 9-1-1?

There are a couple of issues that may impact the direct access to emergency services through 911. Generally, the CPE allows internal calling through the use of short dialing extensions; for example, dialing 123 to reach a particular number served via the CPE. In these cases, the CPE is programmed so that the user must dial an access code for outside call (to reach outside dial tone) or may simply dial a straight 3 digit number for internal calling. This programming would have to be changed to allow 911 to be dialed and sent directly to an outside line. In addition, there could be extensions of 911 (as well as 411, 711 and other X11 codes) for the group of numbers served by the CPE. If a full NXX (10,000 numbers) is purchased, the extensions of 9111, 9112, 9113 and so on are available. Similar issues exist as stated above and either the user would dial 911 and wait for an interdigital time out or the CPE would have to be programmed not to use the 911X numbers.

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?

Yes.

If so, how are the employees or residents notified?

Normally notifications are done through employee training and handouts.

3. Are you involved in or aware of any ongoing efforts to resolve the issue of dialing 9-1-1 from a MLTS?

Yes.

a. If yes, please provide a detailed description.

NENA has information regarding MLTS issues on its website at: [http://www.nena.org/?page=MLTS PBX](http://www.nena.org/?page=MLTS%20PBX). Attached is information derived from that website that identifies relevant current state laws and rules.

4. Are MLTSs programmable to include both 9-1-1 and X-9-1-1 dialing?

All products being sold today should have this capability. However, it is not clear if older equipment would have this ability.

Please explain why or why not?

New products are programmable and are following FCC guidelines for 911 dialing, but this issue could still exist in old legacy CPE installed at customer locations.

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

These costs would be the responsibility of the CPE owner (normally a business customer). The costs would depend on the specifics of the customer's situation. Matters such as maintenance contracts, the age of equipment and whether any assigned numbers have to be changed would impact the costs.

6. Does the Commission have the authority to require direct 9-1-1 access to emergency service?

Direct access to 911 is driven by the features and programming of the CPE. The Commission does not regulate CPE or its operation.

a. If not, why not?

The CPE involved is generally privately owned by the customer, not by the local service provider. CPE manufacturers, CPE vendors, and the end user customer's practices are not regulated by the Commission. As the Commission noted in its order, the FCC is working with major users and equipment manufacturers on this issue. A national standard for direct access to emergency services would not only be the most thorough

and efficient process for addressing this issue but would assure consistency for users attempting to access emergency services across the nation.

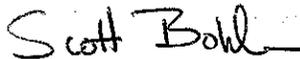
While a national approach to this issue is preferable, some states have passed legislation to address this topic and other PS/ALI issues that PRI, MLTS, PBX and other products raise for 911. Model Legislation can be found on the NENA Website: http://www.nena.org/?page=MLTS_PBX.

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Respectfully submitted,

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