

March 27, 2019

Daniel P. Wolf
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, Minnesota 55101

RE: **Joint Response Of The Minnesota Department Of Public Safety And The Minnesota Department Of Commerce To Qwest Corporation dba Centurylink QC's Reply Comments**
Docket No. P421, P6049/CI-18-542

Dear Mr. Wolf:

Attached are the joint responsive comments from the Department of Public Safety and the Department of Commerce concerning the 9-1-1 Outage of August 1, 2018.

Sincerely,

/s/ Daniel Craigie
Deputy Director Rates Analyst
MN Department of Public Safety
Emergency Communication Networks Division

/s/ Joy Gullikson
Rates Analyst
Minnesota Department of Commerce

DC/JG/ja
Attachment

Before the Minnesota Public Utilities Commission

JOINT RESPONSE OF THE MINNESOTA DEPARTMENT OF PUBLIC SAFETY AND
THE MINNESOTA DEPARTMENT OF COMMERCE TO QWEST CORPORATION
DBA CENTURYLINK QC'S REPLY COMMENTS

Docket No. P421, P6049/CI-18-542

The Minnesota Department of Public Safety (DPS) and the Minnesota Department of Commerce (Department; collectively, Agencies) submits these comments in response to Qwest Corporation d/b/a CenturyLink QC's (CenturyLink) reply comments. The Agencies appreciate the tone of cooperation in CenturyLink's comments; however, there remain a few areas that the Agencies believe need comment and correction. Communications issues and an understanding of roles are two areas that CenturyLink appears to have different perspectives than DPS.

The Agencies believe the following two principles must govern the provision of 9-1-1 services. First, the primary purpose of this investigation is to determine what can be done to ensure that the 9-1-1 system responds every time a person dials or texts 9-1-1 in search of help. If a call does not reach the PSAP or cannot deliver necessary information, then that uncompleted call constitutes a public safety failure, and every effort must be made by the providers of the network and providers of the public safety services to ensure that calls never fail for any reason.

Second, when an instance occurs that prevents citizens from making 9-1-1 calls, whatever the reason, communication flows to all those involved in the delivery of 9-1-1, including network staff, DECN, MESB, PSAPs, and to the public must be prompt, regular, and as complete as possible.

Century Link's comments suggest that it does not have a role in any instance that does not arise within its dedicated network provided by West Safety Services. However, CenturyLink has a system coordination role that it needs to play in the delivery of 9-1-1. The Statement of Work that CenturyLink agreed to states:

The CenturyLink Program Manager along with the CenturyLink Service Manager and Database Manager will combine efforts to serve in a "System Coordination" role, advocating on behalf of DECN and MESB with all originating service providers, VPCs, MPCs, other 911 service providers, and vendors and assist with resolution, mitigation, and root cause analyses of issues that may,

or may not have originated within the CenturyLink 9-1-1 system, or that have been detected through the system's reporting capabilities. The CenturyLink Program Manager will work with the designated Service Manager and Database Manager with these types of activities.

CenturyLink's statement that "this proceeding should focus on 911 and not address network issues that are independent of the 9-1-1 system"¹ seems to ignore the public safety role for which CenturyLink bid. Limiting the investigation to only the core 9-1-1 network unnecessarily ignores sources of problems that may prevent citizens from reaching a PSAP. The Agencies are not suggesting that CenturyLink's task is to ensure that problems never occur, only that CenturyLink agree to assist the public safety agencies in working toward the goal of eliminating failed 9-1-1 calls, no matter the cause. For these reasons the Agencies are opposed to CenturyLink's proposed change to recommendation 1 (e) and ask the commission to include recommendation 1 as originally proposed.

Century misunderstood the Agencies' concerns regarding assigning a service manager and sales engineer, responsible for multiple states' technical operations, to also act as the communications point person during an outage. The Agencies are not disputing the need to have a single point of contact. The Agencies simply wanted to avoid having excessive demands being placed on a single technical person to get the networks up and running, as well as to update PSAPs and DPS as the communications point of contact.²

The Agencies continue to recommend that the Commission order the following:

1. CenturyLink to engage in meetings with DPS and file six monthly reports that contain the following:
 - a) Minutes from the meetings between CenturyLink and the DPS that explain the fixes attempted and the results of those attempts;
 - b) All improvements made to ensure any activity that causes 9-1-1 calls to fail are immediately noticed to CenturyLink and the DPS;
 - c) All improvements that ensure corrective action is taken as quickly as possible with any 9-1-1 failure.
 - d) An explanation of the progress made over the previous month as a result of the meetings.

¹ CenturyLink Response, 4.

² CenturyLink's appeared to recognize the Agencies' concern when it included footnote No. 9 from the Agencies' initial report, reproduced here, with emphasis added:

Further, it appears that all communications from CenturyLink and West were funneled through a single person. This person, a service manager and sales engineer, is also responsible for the technical operations of Minnesota's 9-1-1 system along with responsibilities for Iowa's emergency communications and for ensuring that the correct engineering was done to fix the problems. Public interest demands quick, competent communications in an emergency, such as a 9-1-1 outage. While there is little doubt that the person assigned to be the liaison between the companies, the DPS, and the PSAPs is highly competent, there is also little doubt that he is responsible for so many diverse tasks that it is quite impossible to make all tasks top priority.

- e) The number and circumstance of any failed 9-1-1 calls during the preceding month and the reason for failure. This should include instances and durations where network failures prevented consumers from being able to dial 9-1-1.
2. CenturyLink, and if CenturyLink or DPS desires, any CenturyLink vendor such as West Safety Services, is to meet with DPS to establish procedures and protocols to ensure that proper information is provided to DPS, PSAPs, Metropolitan Emergency Services Board, and others as determined by DPS, following any network 9-1-1 incident. DPS will determine the number and frequency of such meetings. If at any time, DPS becomes uncomfortable with the cooperation and progress of CenturyLink, the matter may be brought to the Commission for resolution.

/ja

CERTIFICATE OF SERVICE

I, Sharon Ferguson, hereby certify that I have this day, served copies of the following document on the attached list of persons by electronic filing, certified mail, e-mail, or by depositing a true and correct copy thereof properly enveloped with postage paid in the United States Mail at St. Paul, Minnesota.

**Minnesota Department of Commerce
Joint Responsive Comments**

Docket No. P421, 6049/CI-18-542

Dated this 27th day of March 2019

/s/Sharon Ferguson

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Linda	Chavez	linda.chavez@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 55101-2198	Electronic Service	No	OFF_SL_18-542_Official
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1800 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_18-542_Official
Daniel	Craigie	daniel.craigie@state.mn.us	Department of Public Safety	Town Square Ste 137 444 Cedar St Saint Paul, MN 55101	Electronic Service	No	OFF_SL_18-542_Official
Regulatory	Department	N/A	West Safety Communications Inc.	1601 Dry Creek Dr Longmont, CO 80503	Paper Service	No	OFF_SL_18-542_Official
Ian	Dobson	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_18-542_Official
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