



State of Vermont
Enhanced 9-1-1 Board
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March 22, 2019

June Tierney, Commissioner
Vermont Department of Public Service
112 State St.
Montpelier, VT 05620-2601

via e-mail only

Dear Commissioner Tierney,

At its March 14, 2019 Special Meeting, the Enhanced 911 Board (the "Board") voted to take the "necessary actions that will result in a petition to the Public Utility Commission (the "Commission") for an appropriate proceeding" to re-examine the issue of host-remote isolation vulnerabilities in the regulated wireline telephone company networks in Vermont.

The Department of Public Service (the "Department") was represented by Clay Purvis, Director of Telecommunications, at the Special Meeting. Mr. Purvis conveyed the Department's readiness to assist the Board with the issue of isolation and agreed that a Public Utility Commission proceeding was the best forum to do so.

The Board appreciates the Department's involvement and, with this letter, requests the Department's assistance in petitioning the Commission for a workshop, or other appropriate proceeding, on this issue.

As you know, host-remote isolation is a specific type of wireline telephone system outage, occurring in the Public Switched Telephone Network, which results in the inability of wireline subscribers in the impacted area to complete certain calls, including calls to 911. The subscriber still has dial tone and the ability to complete local calls to numbers on the same switch. However, the subscriber will not be aware that long distance, off-network, and calls to 911 are not possible.

Isolation vulnerabilities have existed in the wireline network since the inception of the statewide 911 system in 1998. At that time, nearly 70% of 911 calls were made using wireline devices. Over time, the number of 911 calls from wireline subscribers has steadily declined; however, isolation vulnerabilities continue to exist in some locations in eleven of Vermont's fourteen counties.

The Enhanced 911 Board is responsible for providing a statewide 911 system. The Board fulfills this responsibility through a contractual relationship with a Next Generation 911 (NG911) system provider. All telephone service providers operating in Vermont are responsible for delivering their customers' 911 calls to the state's NG911 system. When an isolation event occurs in a wireline telephone service provider's network, 911 calls from the impacted subscribers are not delivered to the statewide 911 system as required even though the 911 system remains fully operational. Of additional concern is the fact that during an isolation event, the subscribers are unaware of their inability to reach 911.

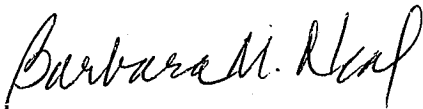
Because this vulnerability exists in the wireline networks of the Public Switched Telephone Network, it is appropriate for the Board to seek, with the assistance of the Department, a Commission proceeding to more fully examine the issue and identify possible solutions. A similar request from the Board in 2006 resulted in the Commission (then the Public Service Board) initiating a series of workshops involving participants from the impacted telephone service providers, the Department and the Board. At that time, however, a viable solution was not identified.

The Board believes it is critically important to obtain a complete, accurate and current set of facts upon which to evaluate the isolation issue as it exists today. Specifically, the Board seeks an appropriate Commission proceeding that will result in the following:

- Identification of the current status, location and impact of isolation vulnerabilities in the regulated wireline telephone company networks
- Identification of potential solutions, including costs, for the resolution and/or mitigation of the isolation risk

The Board expects to fully participate in any proceeding resulting from the petition and looks forward to working with the Department and other stakeholders to fully assess and evaluate the isolation vulnerability and any potential solutions.

Thank you.



Barbara M. Neal
Executive Director

cc: Clay Purvis, Director of Telecommunications, Department of Public Service
Gary Taylor, Chairman, Enhanced 911 Board