

Docket No. 13-0669

Direct Testimony of Mark Neinast

Exhibit MN-5

**BEFORE THE
ILLINOIS COMMERCE COMMISSION**

Petition to Modify)	
911 Provider for Jackson County)	
Emergency Telephone System Board,)	Docket No. 13-0669
Jackson County, Illinois)	

**RESPONSES OF NG-911, INC.
TO
STAFF DATA REQUESTS TEL 1.01 through TEL 1.04**

Intervenor, NG-911, Inc., provides the following responses to Staff Data Requests TEL 1.01 through TEL 1.04, which were served on February 10, 2014.

In accordance with paragraph 8 of the Instructions, the response to each data request question begins on a new page. As part of each response, the data request question is repeated. Each response identifies the name, job title and telephone number of the person or persons responsible for providing the information requested for each data request question. The date of each response is indicated.

The responses are verified, in accordance with the Instructions.

TEL 1.01 In his Direct Testimony, Michael Ramsey states NG-911 is responsible for Provision of the network (Ramsey DTTY, lines 39-43).

a. Current network provisioning requires the carriers to provide facilities from the end users to the Frontier Carbondale selective router. Is there any change in this portion of the network or the responsible parties?

The current network provisioning allows carriers facilities to remain in place if they choose. NG-911, Inc. sees no change in responsibilities for carriers providing 9-1-1 traffic to the ETSB designated termination points. One termination point is the FAS (Carbondale Selective Router); the other termination point is direct connection to NG-911, Inc.

b. In the proposed network provisioning, is the portion of the network from the Frontier Carbondale selective router interface through to the data centers located in the Sheriff's Offices in Harrisburg and Murphysboro considered to be covered by the Frontier Aggregation Service (FAS)? Is the FAS covered by contract or by tariff? If under contract, who are the parties to the contract? If under tariff, who is the customer of record?

Yes, the FAS service includes the Carbondale wire center to the Sheriff's Offices in Harrisburg and Murphysboro. The FAS is covered by commercial contracts between NG-911, Inc. and Frontier Communications.

c. In the proposed network, connectivity between the data centers and the PSAPS appears to be provisioned over facilities provided by Clearwave. Is this correct? Is this portion of the network provided under contract? If so, who are the parties to the contract? If the service is not offered under a contract, who is the customer of record?

The agreement for providing the network is described in paragraph 4 (designated as confidential) of the Amended and Restated System Service Provider Agreement attached to the Petition as Exhibit 11.

The person responsible for the information provided in response to the above data request is:

**Michael Ramsey
President and CEO
NG-911, Inc.
319-668-8911**

Date of Response: February 17, 2014

TEL 1.02

The plan narrative indicates that for carriers connecting directly to the FAS, Plan Narrative, 16 (Split Exchanges), Frontier will route legacy calls from split exchanges to the appropriate county or on to the NG9-1-1 interface if the call stays in Jackson County.

a. Please state the manner in which NG-911 understands that Frontier will be able to determine that the incoming call is from a split exchange. More particularly, please state whether the determination can be made based upon the incoming trunk group. Please state whether all incoming calls are routed through the Frontier Carbondale selective router in order to identify and route calls from split exchanges?

The calls for split exchanges will be identified by NPA/NXX as is done today. Frontier will selectively route and deliver calls to PSAPs that do not reside in Jackson County. Jackson County calls will be delivered to the NG9-1-1, Inc. Selective Routers that are located in the Harrisburg and Murphysboro Data Centers for delivery to the appropriate Jackson County PSAP.

b. In the future, if a carrier directly connects to the data centers and bypasses the Carbondale selective router as appears to be proposed in this plan, please describe in detail the manner in which split exchanges will be handled. Please state whether, in your opinion, Jackson County would be required to file plan modifications in the event carriers directly connect to the data centers.

Should any wireline carrier ever express any interest in direct connection, NG-911, Inc. will enter into negotiations for an agreement on network provisioning, selective routing and split exchanges. Depending on what the Commission's requirements are the time of the direct connect, it may be necessary to file a plan modification.

The person responsible for the information provided in response to the above data request is:

**Michael Ramsey
President and CEO
NG-911, Inc.
319-668-8911**

Date of Response: February 17, 2014

TEL 1.03 In the network diagram, Exhibit 10 page 5 of 5, there is a drawing of a “third party INdigital provided ESRP” which appears to convert legacy signaling to SIP signaling.

- a. In reference to the “equipment provided by INdigital,” please state whether the ESRP is leased. If so, please identify the parties to the lease, and the entity responsible for maintaining the ESRP;

NG-911, Inc. does not know if the equipment is leased. Frontier is responsible for maintaining the ESRP.

- b. After legacy signaling is converted to SIP at either the Carbondale or Ft. Wayne, IN location, it appears that the calls are transported to the Frontier Murphysboro or Harrisburg wire centers. Please identify the type of facilities utilized for this transport, and the entity that provides these transport facilities. If this provision is over leased facilities, please indicate the parties to the lease.

The facilities are provided by Frontier. Calls will be delivered through dedicated Ethernet private line service to the NG-911, Inc. Selective Routers that are located at the Murphysboro and Harrisburg Data Centers.

- c. From the Murphysboro and Harrisburg wire centers to the data centers located in the Sheriff’s Office in the towns of Murphysboro and Harrisburg, it appears that transport is being accomplished via SIP trunking. Please identify the entity that will provide these facilities. If these facilities are being leased, please identify the parties to these leases.

The facilities are dedicated Ethernet private line facilities that are provided by Frontier from Carbondale to NG-911, Inc.’s Selective routers that are located at the Murphysboro and Harrisburg Data Centers.

- d. Please state the frequency with which audits will be conducted of all transport facilities associated with the Jackson County 9-1-1 system to determine adequacy.

Monitoring of the Frontier network by Frontier will be done as it is done today. NG-911, Inc., and Frontier will coordinate and perform an audit for capacity (traffic load) thirty (30) days after Jackson County is cut live and will coordinate a review annually.

Monitoring systems provided by NG-911, Inc. will evaluate the bandwidth and equipment load on a continual basis. The NG-911, Inc. Management Information System (MIS) that is a non-regulated part of the recording system provides metrics. The NG-911, Inc. IP Selective Router also provides metrics for this type of analysis.

- e. Please identify the equipment in the Murphysboro and Harrisburg wire centers, which will interconnect and accept the SIP signaling from the INdigital ESRPs located in Carbondale and Ft. Wayne, IN. Please identify the entity that owns this equipment. If the equipment is provided under a lease arrangement, please provide the parties to the lease. Please identify the entity responsible for maintaining this equipment, and state whether this equipment has been installed.

The calls will be delivered over dedicated private line Ethernet facilities that originate in Carbondale and terminate at the NG9-1-1, Inc. Selective Routers at the Murphysboro and Harrisburg Data Centers. The private line Ethernet facilities pass through the Murphysboro and Harrisburg wire centers, and terminate at the Data Centers.

NG-911, Inc. does not know what equipment is being utilized by Frontier or if the equipment is leased. Facilities are provided by Frontier as part of the FAS agreement. Frontier is responsible for maintaining the equipment.

The person responsible for the information provided in response to the above data request is:

**Michael Ramsey
President and CEO
NG-911, Inc.
319-668-8911**

Date of Response: February 17, 2014

TEL 1.04 Please provide true and correct copies of all responses to data requests propounded by any other party to this proceeding.

NG-911, Inc. will comply.

The person responsible for the information provided in response to the above data request is:

**Michael Ramsey
President and CEO
NG-911, Inc.
319-668-8911**

Date of Response: February 17, 2014