

**STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION**

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

REPLY BRIEF OF AT&T

Illinois Bell Telephone Company d/b/a AT&T Illinois (“AT&T Illinois”) and New Cingular Wireless PCS, LLC (“AT&T Mobility”) (collectively, “AT&T”) respectfully submit their Reply Brief.

I. BACKGROUND AND SCOPE OF PROCEEDINGS

No party objects to AT&T’s recommendation that the order issued in this proceeding explicitly state that it does not establish any precedent or requirements for other next-generation 9-1-1 solutions in Illinois and that the Commission remains open to considering other alternative arrangements that may be proposed in the future. The Commission should therefore include this language in its final order.

II. COMPLIANCE WITH ICC RULE 725 AND APPLICABLE STATUTES

AT&T has nothing further to add on this issue.

III. THE COMMISSION SHOULD REQUIRE CHANGES IN THE PLAN MODIFICATION

A. Direct Connections to NG-911 Data Centers

1. Is Dedicated Transport Required Under Commission Rules?

The parties did not raise any new arguments in their briefs that AT&T has not already addressed in its Initial Brief and therefore AT&T has nothing further on this issue.

2. **AT&T Should Have the Option to Directly Connect to the NG-911 Data Centers**

There are two disputes under this issue. The first is whether aggregation of 9-1-1 traffic creates the potential for network problems – problems that do not occur when 9-1-1 traffic from different carriers, and from different types of carriers (e.g., wireline and wireless), are kept on separate transport facilities. AT&T established that there are technical issues raised by combining 9-1-1 traffic in this manner. One example is a denial of service attack on one carrier that affects all other carriers using an aggregated transport facility.¹ AT&T Initial Br. at 4-5; Neinast Direct, lines 376-408.

NG-911 argues that there is something unique about an IP 9-1-1 network that eliminates any congestion or denial of service issues. For example, it asserts that an IP network component called a “session border controller” will screen out service denial attacks. NG-911 Initial Br. at 9. That is not correct. That device simply distinguishes between authorized and unauthorized carriers. It does not screen out “bad” traffic from authorized carriers. Thus, if an authorized carrier is subject to a denial of service attack, that carrier’s traffic will not be blocked by a session border controller.

NG-911 also argues that “there is no more concern of a denial of service attack through the non-SIP trunks than with the existing legacy access network today. A heavy call load from one particular carrier will simply tie up the trunks from that carrier.” Id. Again, this is not correct. In the existing network architecture, 9-1-1 calls are only aggregated on the transport route between the Frontier selective router and the PSAP that is the ultimate destination for the call. Thus, if there is a congestion problem with one carrier, it can be detected, isolated and

¹ A denial of service attack is an attempt to make a network resource unavailable to its intended users by interrupting or interfering with that service. See, e.g., <http://www.us-cert.gov/ncas/tips/ST04-015>.

corrected so that it does not affect other carriers. In the proposed network architecture, in contrast, 9-1-1 calls are aggregated as soon as they arrive at the Frontier central office, so any congestion problem with a single carrier immediately affects all other carriers.

NG-911 further claims that because 9-1-1 traffic is converted from traditional TDM format to IP format (which takes place mid-point in the FAS service) there should be no concern about aggregation. NG-911 Initial Br. at 8-9. The implication is that converting the traffic to IP somehow eliminates any possibility of congestion on the transport facilities, but that is not true. Although IP networks are designed with redundant paths and can be engineered to handle high volumes of traffic, an IP network is still subject to slowing and blockage due to traffic congestion.

The second dispute concerns AT&T's proposal to fix the concern with the aggregation of 9-1-1 traffic. AT&T proposes that, within 60 days of receiving a request for direct connection from a carrier, Jackson County be required to file a new plan modification to allow direct connection to the NG-911 data centers. AT&T Initial Br. at 7. NG-911 continues to oppose this request, arguing that Jackson County should be free to accept or reject such a request. NG-911 Reply Brief at 3.² Despite NG-911's entrenched opposition to any requirement for direct connection, this issue appears to be resolved by Jackson County's agreement to file a plan modification with the Commission if a carrier requests direct connection to the data centers: "JCETSB has no problem with the filing of a plan modification request should for example, there be a request for direct connection with AT&T or other carriers in the future." Jackson County Initial Br. at 9.

² NG-911 argues that Jackson County only has the responsibility to "consider" such a request and should only file a plan modification if it "deems it to be in the best interest of the citizens it serves."

Jackson County's only concern is that 60 days may not be enough time to file a plan modification to incorporate an option for direct connection. To address this concern, AT&T proposes that this be extended to a 90 day filing requirement. This is reasonable given that the only change to be addressed in such a plan modification is an option to establish a direct connection to a data center and because at least one carrier (Clearwave) has already established direct connection, so it cannot be that difficult to accommodate additional connections. Moreover, it takes several months to get approval of a plan modification, so it will be far longer than 90 days before a carrier is able to establish direct connections.

In sum, the Commission should resolve this issue by requiring Jackson County to file a plan modification to allow direct connection to the NG-911 data centers within 90 days of receiving a request for direct connection from AT&T or another carrier.

B. Split Exchanges

AT&T has nothing further to add on this issue.

C. Frontier Aggregation Service

AT&T requests that the Frontier Aggregation Service ("FAS") be made available to connecting carriers on the same terms and conditions as described in the Plan Modification for at least five years. AT&T Initial Br. at 10. NG-911 states that any termination of the FAS would be a change of network design and would require Commission approval. NG-911 Reply Br. at 6-7. If NG-911's representation means that the FAS will not be terminated and that the conditions (including price) upon which it is made available will not change without Commission approval, then it is an acceptable resolution for AT&T.

Accordingly, AT&T recommends that the order explicitly state that FAS is an integral component of the Plan Modification and that FAS cannot be terminated, and its terms and conditions cannot be changed, without Commission approval.

D. Database and PS/ALI Updating

NG-911 appears to be splitting hairs on this issue. It does not deny that there are business and non-business private switch operators in Jackson County that are required to provide Automatic Location Identification (“ALI”) on 9-1-1 calls.³ Rather, it asserts that there are no such entities in Jackson County that are “directly connected” to the NG-911 data centers. This means, apparently, that all such entities continue to rely on Frontier for the services they need to upload location information into the ALI database so that location information is accurately provided to the PSAP. As Mr. Neinast testified, all 9-1-1 Service Providers in Illinois currently offer PS/ALI Service to customers. Neinast Direct, lines 510-523. NG-911 says that it will accept trunking directly from customers to update the NG-911 database, but there was no explanation of the terms and conditions that would govern this trunking and no demonstration that NG-911 is actually ready and capable of providing such a service. The Commission should insist on such a showing.

IV. CONCLUSION

For all of the reasons set forth above, in the Initial Brief and in the testimony of Mark Neinast, AT&T respectfully requests that the order entered in this proceeding contain all of the recommendations set forth herein.

³ Section 15.6 of the Emergency Telephone System Act (50 ILCS 750/15.6) and 83 Ill. Adm. Code §§ 726 and 727.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I, Mark R. Ortlieb, an attorney, certify that a copy of the foregoing **REPLY BRIEF OF AT&T** was served on the following parties by U.S. Mail and/or electronic transmission on May 15, 2014.

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