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 C-4767 / 911-062 / PI-195

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NEBRASKA PUBLIC SERVICE COMMISSION

COMMENTS OF COX NEBRASKA TELCOM, LLC

Cox Nebraska Telcom, LLC ("Cox") hereby files these Comments for the Nebraska Public Service Commission's ("Commission") consideration in the above-captioned docket, C-4767 / 911-062 / PI-195. These comments are being filed pursuant to the Commission Order entered in said docket on June 16, 2015, and the Hearing Officer Order entered on June 29, 2015.

The Commission posed several questions related to consumers' ability to directly access 911 when Multi-Line Telephone Systems (MLTS) are used. Cox is unable to provide answers to Questions 1 through 5, as Cox does not sell, install or program MLTS. Rather, outside vendors install and program MLTS for Cox's customers. Accordingly, those vendors are the ones in possession of information related to how emergency services are presently being accessed in public places, hotels, offices and multi-story buildings, and whether direct access to 911 can be programmed into MLTS, and if so, at what cost.

The Commission asked if it has the authority to require direct access to 911. Cox believes it is beyond the scope and jurisdiction of the Commission to require all vendors of MLTS to program or re-program existing MLTS to provide direct dialing access to 911. The Commission is vested with authority and jurisdiction over common carriers. In fact, Neb. Rev. Statute §86-128 states common carriers are subject to regulation by the

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Commission, in part to ensure the delivery of essential and emergency telecommunications services. However, the Commission's authority does not extend to non-common carrier MLTS vendors, such as Avaya and Cisco. While some common carriers may sell, install and program MLTS for their customers, Cox does not. Therefore, even if the Commission required all common carriers to configure the MLTS they sell to allow direct access to 911, it would only benefit some end users. If the Commission wishes to mandate that direct 911 dialing be programmed into all MLTS by all vendors statewide, Cox believes legislation would be necessary. Alternatively, the Commission could wait for the FCC to enact regulations at the federal level, which would then apply to vendors and carriers throughout the country.

Respectfully submitted this 13th day of July, 2015.

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