



State of Utah

Department of Commerce Division of Public Utilities

CHRIS PARKER
Executive Director

ARTIE POWELL
Director, Division of Public Utilities

GARY HERBERT
Governor

SPENCER J. COX
Lieutenant Governor

Action Request Response

To: Public Service Commission of Utah

From: Utah Division of Public Utilities

Artie Powell, Director

Brenda Salter, Utility Technical Consultant Supervisor

Shauna Benvegna-Springer, Utility Technical Consultant

Date: October 23, 2020

Re: **Docket No. 20-054-02**, Union Telephone Company, Inc.'s Outage Affecting
Landline 911 Services.

Recommendation (Acknowledge)

The Division of Public Utilities (Division) recommends the Utah Public Service Commission (Commission) acknowledge receipt of the Union Telephone Company's (Company or Union) outage report of September 8, 2020 to September 18, 2020.

Issue

On September 23, 2020 the Company filed with the Commission an outage report affecting the Company's landline 911 service. On September 25, 2020, the Commission issued an Action Request to the Division asking the Division to evaluate and report to the Commission on two issues. One, whether the Company complied with Commission Rule 746-340-2(C), and two, whether the Division expects any customer complaints as a result of this outage. The Commission asked the Division to report its findings and recommendations by October 23, 2020. This memorandum represents the Division's response to the Commission's Action Request.

Event Description

On September 8, 2020 a new landline switch was being installed by a vendor on behalf of the Company. At the time, the translations table encountered a mistake. The Company reports “No alarms were raised, and no post testing done which led to an extended outage as no one know [sic] the Land Line 911 was down.” The 911 outage affected 563 Utah customers in Daggett County specifically; Manila, Dutch John, Greendale, and Christmas Meadows for a duration of 263 hours or nearly 11 days. The broken 911 service was resolved on September 18, 2020. The Company and the vendor worked with the public safety answering point (PSAP) to test various scenarios. The Company stated that due to PSAP limitations during the snowstorm and Union being focused on the new switch installation (where 911 calls were working properly) unfortunately, nobody thought to go back and check 911 calls from the previous section worked.

Discussion

The Commission rule R746-340-2(C)(2) states:

“Central offices with more than 500 local access lines, shall each report as promptly as possible to the Commission and the local news media, including, but not limited to, radio, TV, and newspaper, when applicable, failure or damage to the equipment or facilities which disrupts the local or toll service of 25 percent or more of the local access lines in that central office for a time period in excess of two hours”.

The central offices in Dutch John, Manila, Greendale and Christmas Meadows combined exceed 500 local access lines. On their own, each central office has less than 500 local access lines. The Company does not meet the requirement to comply with the rule since each central office affected has less than 500 local access lines. The Company notified the PSAP agency, but did not contact local news media.

Nevertheless, the Company has implemented required testing of 911 originating scenarios for future migration translation changes.

The Division spoke with Mike Nelson of Union Telephone Company regarding the 911 service outage. Mr. Nelson indicated that the Company did not receive any complaints, nor does it expect any. The Division did not receive any complaints as a result of the 911 service outage, either.

Conclusion

The Division recommends the Commission acknowledge receipt of the Company's outage report. The Division commends the Company for identifying and implementing resolutions to help prevent this type of event from occurring again.

cc: Mike Nelson, Union Telephone Company
Virg Bodyfelt, Union Telephone Company
Chris Reno, Union Telephone Company
Eric Woody, Union Telephone Company