March 20, 2015

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

RE: 911 Governance and Accountability, PS Docket No. 13-75

Dear Ms. Dortch,

Pacific County Communications, a Division of the Pacific County Sheriff’s Office supports the Washington Utilities and Trade Commission (WUTC) comments in the matters of improving 911 reliability. That said, there is nothing in the NPRM that should act or be construed to impede state commission and local governmental authority over reliable 911 service. Governance of 911 is presently shared among state, local and federal authorities. The local structure and provision of 911 service is predominantly a matter of state law, including oversight of the provision of 911 service by incumbent telephone companies pursuant to tariff and regulations established by state commissions. These basic concepts of organization must continue.

Pacific County appreciates that the WUTC and Commission's position appropriately acknowledge the vital role that state and local governments play in overseeing deployment and operation of emergency communications infrastructure and programs, including reliable 911 service. As the nation transitions to new 911 architectures and specialized providers, Pacific County supports the WUTC and Commission acknowledgement that such structural developments should have the necessary redundancy and reliability safeguards, along with the recognition that significant changes in 911 service should be coordinated in a transparent manner between the Commission and state and local authorities and that the Commission will act cooperatively with state and local governments on any changes to 911 services that create real or perceived gaps in the delivery of reliable and resilient 911 services.

In light of Washington's experience with the April 2014 multistate 911 outage, Pacific County supports a number of the Commission's proposed revisions to Rule 12.4 as necessary means to improve accountability in the delivery of safe and reliable 911 services. Further Pacific County is in agreement with the Commission and WUTC in respect to expanded certification requirements for all entities involved with critical aspects of safe and reliable 911 service, and expanding the range of network reliability practices that 911 service providers must address through the Commission's certification requirements.

The Commission, the WUTC, and local governance organizations all play a vital role in overseeing the nation's goal of maintaining safe, reliable and resilient 911 services. Pacific County believes that the recent response and collaborative efforts between Commission and WUTC personnel concerning the
April 2014 multi-state 911 outage exemplify meaningful federal – state coordination on such public safety matters, a model the Commission should reinforce by virtue of many of the proposals set forth in the NPRM.

Being among the first first responders, Pacific County Communications is seriously concerned and committed to taking steps necessary to improve the reliability and resiliency of the 911 network.

Sincerely,

Scott L. Johnson
SHERIFF

Stephanie Fritts
CHIEF DEPUTY