

**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF COLORADO**

PROCEEDING NO. 17R-0488T

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IN THE MATTER OF THE PROPOSED AMENDMENTS TO TELECOMMUNICATIONS  
RULES 4 CODE OF COLORADO REGULATIONS 723-2-2130 THROUGH 2159 AND  
2008(a).

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**CTIA RESPONSE TO LARIMER EMERGENCY TELEPHONE AUTHORITY'S  
EXCEPTIONS**

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Pursuant to Commission Rule 1505(a) (4 CCR 723-1-1505(a)), CTIA – The Wireless Association<sup>®</sup> (“CTIA”) hereby responds to the Larimer Emergency Telephone Authority’s (“LETA’s”) October 30, 2017 Exceptions to the Recommended Decision<sup>1</sup> in this proceeding.

This rulemaking proposes to amend the Colorado Public Utilities Commission’s (“Commission’s”) Telecommunications Rules pertaining to 9-1-1 services: specifically, the Commission Rules set forth at 4 *Code of Colorado Regulations* 723-2-2130 through 2159, along with 2008(a) (the “Proposed Revised 9-1-1 Rules”).<sup>2</sup> As noted in the *NOPR*, the Proposed Revised 9-1-1 Rules are essentially the proposed rules that accompanied the 9-1-1 Advisory Task Force’s (“Task Force’s”) Petition<sup>3</sup> requesting that the Commission open a rulemaking to adopt 9-1-1 rules revisions that “the Task Force developed over the course of several months through the use of multi-stakeholder workshops.” *NOPR* at 3, ¶ 4. The Proposed Revised 9-1-1 Rules included under the *NOPR* made only minor revisions for administrative corrections and consistency over the proposed rules submitted by the Task Force Petition. *NOPR* at 3-4, ¶ 8. In

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<sup>1</sup> Decision No. R17-0821 (October 13, 2017) (“Recommended Decision”).

<sup>2</sup> See Notice of Proposed Rulemaking, Decision No. C17-0575 (July 28, 2017) (“*NOPR*”).

<sup>3</sup> Petition of the Colorado 9-1-1 Advisory Task Force for Rulemaking to Streamline, Update, and Improve Commission Rules 2130-2159 and 2008(a), Proceeding No. 17M-0319T (May 24, 2017) (“*Task Force Petition*”).

turn, the Recommended Decision makes only minor clarifying revisions to the Proposed Revised Rules, proposing that the Commission adopt those rules (with minor revisions) as the final rules in this proceeding.

In its written comments and at the public comment hearing, LETA requested that the Commission consider various issues that it contends require further Commission attention, which the Administrative Law Judge declined to address. LETA's Exceptions to the Recommended Decision now rhetorically ask a host of questions,<sup>4</sup> but propose no actual alternative rule language for the Commission to consider. It is not altogether clear what LETA is asking the Commission to do.

For its part, CTIA reiterates what it stated in its comments and at the public comment hearing: the Proposed Revised Rules are the product of significant collaborative work by a diverse group of stakeholders including 9-1-1 governing bodies like LETA (which participated throughout the process), Commission Staff, and industry. Throughout this process, now spanning more than a year, the 9-1-1 Advisory Task Force,<sup>5</sup> the Commission,<sup>6</sup> and the Administrative Law Judge<sup>7</sup> in this proceeding have all recognized the significant work that went into the development of consensus rules. The Commission should therefore deny LETA's

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<sup>4</sup> See, e.g., LETA Exceptions at 4 (“Who is responsible for implementing Condition 4 routing when a central office is located? “What is a governing body’s or PSAP’s remedy when Condition 4 routing is not implemented timely or properly?”); *Id.* at 4-5 (“Are the recommended rules clear enough that the BESP is required to have geographic and physical diversity to the governing body’s point(s) of demarcation or the point of interconnection with the PSAPs?” “What is the process for establishing a point of demarcation/interconnection if it is other than a PSAP?” “What is the difference between physical and geographic diversity?”).

<sup>5</sup> See *Task Force Petition* at 11 (“[t]he draft redline of the Commission’s 9-1-1 Rules . . . is the result of many hours of work, discussion, and compromise by a widely diverse set of 9-1-1 service stakeholders.”) The *Task Force Petition* further noted that: “[b]ecause of the extensive work done over the several months of workshop meetings, however, it is anticipated that any such comments or changes [in the rulemaking] would be fairly limited.” *Id.* at 4.

<sup>6</sup> *NOPR* at 2, ¶ 2 (“The changes proposed are reflective of the consensus revision of these rules submitted to the Commission by the 9-1-1 Advisory Task Force.”).

<sup>7</sup> Recommended Decision at 2, ¶ 2.

Exceptions and adopt the Proposed Revised Rules, as minimally modified by the Recommended Decision.

Dated: November 13, 2017

By: */s/ Philip J. Roselli*

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 13th day of November, 2017 the foregoing CTIA Response to Larimer Emergency Telephone Authority's Exceptions was filed, and served by the Colorado Public Utilities Commission solely via its electronic filing system.

/s/ Philip J. Roselli

Philip J. Roselli