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16 July 2010

California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Subject: MLTS E9-1-1 Workshop R.10-04-011

To Whom it May Concern,

Facey Medical Foundation is a non-profit, multi-specialty, multi-site healthcare provider group with 150 physicians providing healthcare services to over 150000 residents of Los Angeles County.

Corporate headquarters are in Mission Hills CA with remote sites in San Fernando Valley, San Gabriel Valley, Santa Clarita Valley, and shortly a new site in Simi Valley.

In order to minimize the cost of services from telephone company providers like Verizon and ATT we've begun the process of converging our voice and data networks. By implementing Voice over IP technology we can cut the number of telco lines, and the corresponding monthly recurring fees, by a substantial amount.

In our first implementations we've placed VoIP phones at two new sites. These phones are controlled by VoIP enabled PBX systems at two other sites. As such when outbound calls from our VoIP phones leave our PBX network and make it to PSTN, the outgoing trunks, and corresponding location information are at a different location than the actual phone being used to make the call.

While implementing E-911 services with our PSTN providers to minimize the risk of an ambulance arriving at a location 10 miles from the emergency, I did a bit of research and found many states are now requiring that the correct location information gets sent to 911 call centers, sometimes even going down to the suite level.

In researching this I contacted the CPUC to see if California had any such regulations that our company would be required to meet.

I would think that as this technology becomes widespread that it would be beneficial for the public safety if CPUC were to establish the following:

- A) Similar regulations to other states requiring accurate station level location identification be sent to 911 systems.
- B) Public outreach communications such that information on e-911 services was easy to find.
- C) A working dialogue and cooperative mission with Telco providers that would help ensure that the telco providers customers needs are proactively addressed.

Thank you,

A handwritten signature in black ink, appearing to read "Russel Wilmes", is written over a faint, larger version of the same signature.

Russel Wilmes
Enterprise Architect | Security Officer
Facey Medical Foundation