Docket Number: TC14-002
Subject Matter: Third Data Request
Request to: Intrado Communications Inc.
Request from: South Dakota Public Utilities Commission Staff
Date of Request: June 9, 2014
Responses Due: September 25, 2014

3-1) Referring to data request 1-4, does Intrado think their services will need a Certificate of Authority for interexchange service? If so, please amend this application with any additional information required by ARSD 20:10:24:02 and submit the $250.00 application fee as required by SDCL 49-31-3. If not, please provide a detailed explanation as to why a certificate of authority is not needed for interexchange service based on Intrado's operations.

Intrado Communications' services include the ability for a PSAP to transfer a call to another PSAP located in a different local exchange that is served from a different selective router. As a result, Intrado Communications has requested a COA to provide intrastate interexchange services.

3-2) Please provide a detailed explanation of the 911 outage that occurred on April 10, 2014 and the corrective actions taken to prevent reoccurrence.

On April 10th, between 12:54 a.m. (MST) and 7:06 a.m., Intrado's A9-1-1 system experienced a system disruption caused by a technical error, which prevented the system from properly processing calls routing to CAMA PSAPs. Specifically, a PSAP Trunk Member (PTM) threshold counter in the Englewood, CO Emergency Call Management Complex (ECMC) exceeded its administered threshold, resulting in the system's inability to assign trunks for PSAP CAMA call delivery via the Englewood ECMC. Under normal operations for calls to PSAP CAMA destinations, this counter is incremented when a PSAP CAMA trunk is assigned for call delivery and is used as a unique identifier within the geographically distributed databases. When the threshold counter reached capacity, no additional database entries to reserve a PSAP CAMA trunk could be created, resulting in the inability to assign a trunk for call delivery.

Intrado Corrective Action(s) include the following:

   a.   On recognition of the problem, the PTM threshold was increased for both ECMCs so that it is not theoretically possible to exhaust the threshold ranges.

   b.   An enhanced alarming system was implemented with a specific, identifiable alarm for when the PTM threshold is reached.

   c.   Periodic manual checks of the counter are being performed.

   d.   Intrado technical teams are actively engaged in an A9-1-1 architecture review.

The system is geographically redundant and is designed to failover between core processing sites. This situation occurred at a point in the application logic that was not designed to perform any automated

corrective actions. The situation at the Englewood ECMC did not affect the processing at Intrado's Miami ECMC. Intrado initiated manual failover of all call processing to Miami, Florida ECMC when the issue was diagnosed.