



STATE OF WASHINGTON  
MILITARY DEPARTMENT  
EMERGENCY MANAGEMENT DIVISION

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## Amended Letter of Agency and Carrier Notification of Change in 911 Services

Notice 01-2025

EFFECTIVE DATE: May 1, 2025

This first amendment of the Letter of Agency dated October 7, 2016 (LOA), has been adopted to inform originating service providers (OSPs) that the State of Washington Military Department (MIL), as the State's designated 911 Authority, through the State 911 Coordination Office (SECO), has authorized TeleCommunication Systems, Inc. (COMTECH) to provide the State and public safety answering points (PSAPs) within the State with all functions necessary to implement Phase 1 and Phase 2 of the Next Generation 911 (NG911) transition, as set forth in the Federal Communications Commission's (FCC's) NG911 Transition Order. *See Facilitating Implementation of Next Generation 911 Services (NG911); Location-Based Routing for Wireless 911 Calls*, PS Docket Nos. 21-479 and 18-64, Report and Order FCC 24-78, 2024 WL 3507091 (July 19, 2024) (*NG911 Transition Order*).

On May 1, 2025, the State initiated Phase 1 of the *NG911 Transition Order* with the submission of the FCC 911 Authority NG911 Valid Request Form into PS Docket No. 25-143. OSPs will be notified when the State is ready to begin Phase 2 of the NG911 transition through a separate filing.

The State hereby authorizes COMTECH and/or its designated vendors, to discuss, arrange, coordinate, and order the reconfiguration and transport of originating service providers' call origination ingress and the delivery of 911 caller location information for and in support of provisioning SIP signaling as required by Phase 1 of the *NG911 Transition Order*:

1. Current and new circuit group information as required to affect a successful transition/migration to SIP call transport and related services from the current technology being used to connect to the State of Washington ESInet;
2. Description and configuration of the types of facility transport currently in use (including, but not limited to, signaling protocols, type and quantity of trunks/virtual trunk definition, CLLI codes, DACS location, etc.) for connection to/from the system/network for the ESInet; and
3. All relevant points of interconnection and information related thereto.

The State further authorizes COMTECH to request and obtain, as needed, from your organization (including, but not limited to, all originating service providers, PSAPs and 911 authorities responsible for 911 in each county of the State of Washington and their vendors) providing communications services or supporting 911 services in or for the State (or its surrounding areas), the following information:

1. Service Order Input information (including, but not limited to, data formats, transfer mediums, subscriber address information, etc.) for all customers and subscribers within the State's emergency service area;
2. Where applicable for dynamic solutions utilizing pseudo-Automatic Number Identification (pANI), the Emergency Services Routing Key (ESRK), Emergency Services Routing Digit (ESRD), Emergency Services Query Key (ESQK), all pANI records and related Automatic Location Information (ALI) steering tables;

3. All relevant telephone customer and/or subscriber record information available by law or regulation to the State (which, for greater certainty, includes, but is not limited to, all local 911 authorities responsible for 911 in each county of the State of Washington) and/or 911 service providers;
4. Daily company SOI update activity used for the purpose of providing or supporting 911 services in the State, responding to requests for emergency services from company customers/subscribers, and any other information associated with and/or supporting telephone number and emergency call routing function data; and
5. Any other information associated with and/or supporting 911 provisioning, location determination, routing, and data from the State.
6. If you have a third-party provider for transport and/or data submissions to database providers, please forward this notification to that third party and request the third party to acknowledge this notice and/or make contact with the Points of Contact listed above.

**CONFIDENTIAL INFORMATION**

Any proprietary or confidential information and/or data acquired hereunder will be used solely for the purpose of providing the State of Washington ESInet and associated Core Services, Features, and Functions described above and will be protected from unauthorized use or disclosure, except as required by law. Please place the term "CONTAINS SOME CONFIDENTIAL INFORMATION" on the cover of any document containing confidential and/or proprietary information. Also clearly and specifically mark the specified confidential and/or proprietary information within the document.

**This LOA is effective on the date shown above and will remain in effect until revoked in writing.**

**SIGNATURE REQUIRED**

The undersigned represents that they have the authority on behalf of the State to execute this Letter of Agency and authorize all of the details set forth herein.

Washington State Military Department, State 911 Coordination Office

By: 

Name: Adam R. Wasserman

Title: Washington State 911 Coordinator



**POINTS OF CONTACT**

For questions regarding this LOA, or regarding the requests herein, please contact:

Washington State 911 Coordination Office  
Jonathan H. Brock  
Deputy State 911 Coordinator for Technical Services  
[911TechnicalServices@mil.wa.gov](mailto:911TechnicalServices@mil.wa.gov)  
(253) 512-7081 or (253) 553-7706

For questions regarding the COMTECH ESInet or NGCS, please contact:

Comtech Telecommunications Corp.  
Greg Pittsford  
Program Manager, Client Services  
[Greg.Pittsford@comtech.com](mailto:Greg.Pittsford@comtech.com)  
(206) 792-2238 or (206) 468-4707

**Summary of Phase 1 Requirements**

To ensure compliance with the *NG911 Transition Order*, all covered OSPs must transition their TDM connections into the State of Washington ESInet to SIP according to the timeframes established by the FCC. The State of Washington ESInet operator has multiple locations that will qualify as eligible POIs for this transition. The goal of this approach is to deliver 911 traffic to the ESInet as close to the OSPs network switch as is practical. The SECO is open to discussing which POIs would be most advantageous and resilient for each OSP, with the understanding that each OSP should have at least two connections to ensure redundancy and resiliency.

**TIMELINE**

SECO and COMTECH will be holding weekly virtual kick-off meetings between May 14, 2025 and June 11, 2025 to brief OSPs on the scope and timing of transitioning their existing circuits to SIP. In addition to this LOA, additional documentation will be provided to include:

- A) OSP Interconnection SOP
- B) OSP Facility Assignments (Points of Interface)

The approximate Phase 1 timelines, as specified by the FCC for each classification of OSP shall be:

|   |           |
|---|-----------|
| Non-rural wireline providers .....                            | 6 months  |
| Rural local exchange carriers .....                           | 12 months |
| Nationwide commercial mobile radio service providers .....    | 6 months  |
| Non-nationwide commercial mobile radio service providers..... | 12 months |
| Covered text providers .....                                  | 6 months  |
| Interconnected VoIP providers.....                            | 6 months  |
| Internet-based TRS providers.....                             | 12 months |

