

Report to the Legislature

**Making Personal Emergency Response System Subscriber Information
Known to First Responders During an Emergency**

ESSB 6002, Section 206(21)

November 14, 2014

**Prepared on behalf of the Washington Association of Area Agencies on
Aging by:**

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Background

San Juan County Telecommunications Outage

For a week during November of 2013 much of San Juan County experienced a telecommunications outage due to a severed underwater fiber cable. Normal 911 communications between the islands and with the mainland were disrupted. Because the telephone lines were not operational the Personal Emergency Response System (PERS) alert systems used by subscribers to summon assistance in the event of a health emergency were also not working. Out of concern for the safety of vulnerable island residents, as the outage continued first responders began door-to-door welfare checks. In order to better target those efforts they contacted the PERS vendors to obtain contact information for subscribers. They used the list of such vendors that had contacted 911 on behalf of subscribers who had activated their emergency device at some time prior to the outage. They reasoned that PERS subscribers had self-identified as vulnerable and therefore should be among the first to receive a welfare check. The First Responders had mixed success in getting the requested information from vendors, largely due to the unique nature of the request and lack of clear protocols on how key issues could be addressed.

As indicated in the report in Appendix F, long-term telecommunications outages are rare, but they produce significant disruption.

Legislative History

Two related bills were introduced in the 2014 legislative session, SB6527 and SB6554, which would have required employees of companies providing PERS life alert services to provide the location and any known medical conditions of their customers when requested by first responders during an emergency. Neither bill passed the legislature, but a proviso was included in the 2014 supplemental operating budget that directed further study, as follows:

ESSB 6002 Section 206(21)

\$30,000 of the general fund--state appropriation for fiscal year 2015 is provided solely for the department to contract with area agencies on aging to convene a work group to include first responders and companies providing life alert or other emergency alert services and to develop a proposal on how vulnerable adults who have life alert services might be made known to first responders in the event of a long-term power or telecommunications outage. The work group shall review methods for information sharing to include:

- a) Protocols and conditions in which information would be shared;
- b) A process whereby vulnerable life alert and emergency alert customers may provide permission for their information to be shared in the event of an emergency;

- c) Privacy protections for participants in the program; and
- d) Liability protections for agencies that collect, maintain, and track information.

The work group shall develop recommendations and provide them to the office of financial management and to the appropriate legislative committees by November 15, 2014.

This report summarizes the conclusions of the workgroup called for in the proviso.

Workgroup formation and process

The Washington State Association of Area Agencies on Aging committed to convening the requested work group. Northwest Regional Council (NWRC) is the Area Agency on Aging serving the area that includes San Juan County and volunteered to facilitate the work group with focus on the goal, shared among all participants, of protecting vulnerable adults in emergencies. The workgroup was made up of representatives of law enforcement, fire and EMS Services, PERS industry, legislative staff, and DSHS. NWRC convened three workgroup meetings to facilitate discussions. The membership of the workgroup is listed in Appendix A.

What is a Personal Emergency Response System and how does it work?

PERS units enable subscribers to call for help in an emergency by pushing a button or otherwise activating their system. A PERS device includes a small radio transmitter, a console connected to the subscriber's telephone, and an emergency response center that monitors calls. Monitoring centers receive an alert when a subscriber activates their system. Staff at the monitoring centers screen the alerts and determine what action to take, such as whether to call an emergency contact designated by the subscriber, call 911, or simply talk the caller through the situation. Some PERS providers directly operate their own response centers while some contract that function to other organizations.

PERS products and services are provided by both national and local organizations, directly or through a dealer networks. The equipment is sold, rented, or leased to a subscriber, who then completes a service agreement.

PERS is not typically covered by insurance, however the Washington State Department of Social and Health Services (DSHS) will pay for a PERS unit for people with significant disabilities who qualify for in-home long-term care services under Medicaid.

Who are the subscribers and how many are there statewide?

Vulnerable adults, such as seniors and adult with disabilities are the primary subscribers of PERS services. They include people who are often isolated, living alone, have limited mobility and/or who are living with chronic conditions. They are some of the most vulnerable, at-risk residents of any area.

According to a report recently published by the Washington State Board of Health¹, there are approximately 36,000 PERS subscribers in Washington State. One fourth (approximately 9,000) of those subscribers have services that are funded by DSHS.

Analysis

Confidentiality and HIPPA

Early discussion included concerns about disclosure of HIPPA- protected subscriber information. As discussion progressed, it became clear that HIPAA rules were not a significant to PERS providers sharing basic information with first responders barrier for several reasons:

1. In an emergency, first responder organizations are primarily interested in basic subscriber contact information, not HIPPA-protective medical information. Any sensitive information would be gathered as needed directly from the subscriber.
2. DSHS legal analysis did not find that sharing basic identity, location, and contact information with first responders was a violation of HIPPA and they have started contractually requiring vendors of PERS services under Medicaid to do so in emergency situations.
3. Even if HIPPA protected information is provided, First Response organizations have access to and utilize medical and personal information in the course of providing service every day. They are well-versed and regularly must comply with HIPA requirements.

All workgroup participants agreed that HIPAA concerns related to this situation have been addressed.

Liability

A primary liability concern pertained to the protection of personal and medical information. The HIPPA-related analysis described above resolved that concern

A second liability concern related to potential release of information to people who could not be confirmed to be first responders, which is address below in the protocol section of this report.

The members of the workgroup who represented public organizations also expressed concern that if new legislation is considered on this topic, care should be taken to ensure it does not create expand or create a duty to act related to the Public Duty Doctrine, which holds that government has a general duty to protect the public as a whole. They recommended that local legal advisers be consulted if legislation is drafted.

Cross-jurisdictional communications (identifying caller requesting information)

¹ Washington State Board of Health, Health Impact Review of SSB 6554, pg 6.

Representatives of the PERS Service Industry supported implementing an emergency protocol when contacted by a recognized PSAP (Public Safety Answering Point) requesting the information in an emergency. Being able to accurately identify the caller as a central dispatch entity or PSAP personnel is critical. Methods for verifying caller identity that were identified included reverse-lookup using the phone number of the caller, identifying them by their unique PSAP number, or contacting a third party (another jurisdiction) for verification. All 911 centers throughout Washington have a list of current coordinators in each county who could be a source for verification.

Recommendations

Protocols and conditions in which information would be shared

Representatives of the PERS service industry expressed their interest in continuing cooperative relationships with PSAPs (Public Safety Answering Points). The industry appreciates the need for and benefit of the relationship. As a result of the event that occurred in San Juan County, industry leaders initiated planning for how to effectively prepare for future, similar events.

Philips Lifeline developed a new draft Request for Subscriber Data Policy (Appendix E) that workgroup members agreed could be a paradigm for how to approach future emergency situations. It includes specific actions to be taken in the event of an emergent request. First responders indicated the new policy would have addressed their concerns for access to information if it had it been in place at the time of the San Juan emergency. Absent legislative direction, making such a standard an industry standard would require voluntary agreement across a diverse industry.

For the 9,000 people who receive PERS services under Medicaid, during the summer of 2014 DSHS added language (Appendix D) that contractually compels provision of basic information to first responders in the event of emergency. The key contractual addition is:

“The Contractor shall provide the name, address and any other contact information necessary to verify the client’s well-being to emergency first responders on request in the event of natural disasters or other emergencies that render the alert system inoperable.”

DSHS is silent on how the providers would meet that requirement, however workgroup members agree that the new Philips policy and DSHS contract language would make the needed subscriber information more accessible to emergency responders.

All agreed the potential sharing of PERS subscriber information is only one of a variety of tools that could be used to identify vulnerable citizens that may need assistance. It would be up to First Response organizations to determine the need to access the information based on the situation. All agreed that PERS monitoring centers would be the best conduit for First response organizations to contact to access PERS subscriber contact information.

A process whereby vulnerable life alert and emergency alert customers may provide permission for their information to be shared in the event of an emergency

PERS subscriber contracts include language a list of all parties (relatives or others) that could be contacted in case of an emergency. The list includes 911/Emergency Services as a possible contact. In the event that the monitoring center is not able to reach the subscriber or the other parties listed in their contract, 911 would be contacted to dispatch a first response organization to check on the subscriber. It was determined that additional contract language would not be necessary. The workgroup recommends PERS organizations discuss with subscribers upon enrollment that in the event their PERS system is not operational, due to severe weather or unexpected natural or infrastructure emergencies, their contact information may be provided to first response organizations.

Privacy protections for participants in the program

PERS subscribers' information is protected by PERS service providers. As part of their service agreement the subscriber specifies who can be contacted on their behalf in the event they cannot be reached. In addition, there may be instances (emergency or telecommunications outage) where first response organizations contact the monitoring center and request subscriber contact information in order to check on multiple subscribers in a particular area. In either case, as noted earlier in this report, first response or emergency service organizations that receive PERS subscriber contact information will protect that information as they do all people they serve. No additional protections are necessary.

Liability protections for agencies that collect, maintain, and track information

As noted above, a primary concern of first responder organizations was that as potential legislation moves forward, liability under the public duty doctrine is not created, that it does not create a duty to act or any other unintended consequence.

AAGs in the Attorney General Torts Division recommend the following language be included in any potential legislation: "This act does not create a private right of action nor does it create any civil liability on the part of the state or any of its subdivisions, including first responders [as defined]."

APPENDIX A

Workgroup Membership

Law Enforcement

Sheriff Rob Nou, San Juan County Sheriff's Office
Robin DeLaZerda, Dispatch Supervisor, San Juan County Sheriff's Office
Edgar J. Green, Chief of Police, Oak Harbor Police Department
Chief Chris Gaddis, City of Normandy Park Police Department

EMS/Fire

Kevin O'Brien, Fire Chief, Orcas Island Fire
Mik Pryz, Assistant Fire Chief, Orcas Island Fire
Rita Harvey, Orcas Island Fire
Mark Raaka, MS, EMT-P, Director of EMS, Skagit County

PERS Industry

Rob Makin, Principal, Rob Makin Consulting representing Philips Electronics
Michael Tracey, Senior Manager, Phillips Lifeline Monitoring Services
Daniel Felton, Senior Manager, Philips Lifeline, State Government Relations
Barry Nyer, Philips Lifeline, Senior Pricing Manager
Richard Bangerten, President and CEO, Rescue Alert

Government

William Bridges, Legislative Staff
Sydney Forrester, Democratic Caucus Staff
Debbie Johnson, HCBS Waiver Program Manager, DSHS
Sierra Rotakhina, Washington State Board of Health, Health Policy Analyst

Dan Murphy, Executive Director, Northwest Regional Council
Kristine Glasgow, Community Information and Operations Director, Northwest Regional Council
Michael Duncel, Planner, Northwest Regional Council

APPENDIX B

Meeting Agendas

Meeting 1 – October 3, 2014, 1:00 – 3:00 p.m.

Personal Emergency Response Workgroup October 3, 2014, 1:00 to 3:00 (Pacific) Agenda

Conference Call Bridge (360) 407-3780 - PIN 378235#

1. Introductions

2. Review of conference call schedule and process

3. Review Scope:

- *ESSB6002: Area Agencies on Aging to convene a work group to include first responders and companies providing life alert or other emergency alert services and to develop a proposal on how vulnerable adults who have life alert services might be made known to first responders in the event of a long-term power or telecommunications outage.*

4. Background: What brings this issue forward?

- Communications outage in the San Juan Islands
- SB6554 (attached)
- DSHS Medicaid PERS contract changes (attached)
- Shared goal of ensuring protection of vulnerable adults during an emergency

5. Discussion: Protocols and conditions in which the information would be shared

- How is information shared/what information is shared now between PERS providers and first responders?
- How do first responders use the information?
- How would that process need to change to get information to first responders in an emergency?
- How could emergency be defined and appropriate jurisdictions for first responders determined?
- What practical challenges might this create for first responders? For the industry? How could they be mitigated?
- Other concerns/suggestions?

6. Discussion: Privacy protections for participants in the program

- What information provided to PERS providers is confidential? Subject to HIPPA protections?
- Assuming “opt in,” does participant permission address EPRS provider concerns about releasing the information?
- What privacy protections are first responders held to? How would those apply to information that comes from PERS providers? Are other protections needed?
- Other concerns/suggestions?

7. Discussion: A process whereby vulnerable life alert and emergency alert customers may provide permission for their information to be shared in the event of an emergency

- What is the scope of information to be released? Name and address? Health information?
- What level of permission is necessary?
- What practical concerns would providing permission raise for first responders? For PERS providers? How could those be mitigated?
- Other concerns/suggestions?

8. Discussion: Liability protections for agencies that collect, maintain, and track information

- What liability concerns have been raised and how could they be addressed?

Meeting 2 – October 28, 2014, 1:00 – 3:00 p.m.

Personal Emergency Response Workgroup Agenda

Conference Call Bridge (360) 407-3780 - PIN 378235#

1. Introductions

2. Review summary of October 3 conference call

3. Follow-up discussion from October 3

- a. Report back on any discussion from MAMA meeting
- b. Potential for indemnification and applicability of the Good Samaritan Law
- c. Review of any new information on HIPPA applicability

4. Proviso item: Protocols and conditions in which the information would be shared

The following protocol draft for discussion purposes is based on Philips Subscriber Data Policy:

1. Requesting first responder identifies themselves to PERS provider contact (e.g., police department, central dispatch) in emergency situation
2. Emergency Situation definition: Any situation where there is the potential for imminent death of or injury to a subscriber if Emergency Services fails to promptly respond to a situation. Emergency situations are urgent, time critical, and could possibly be mitigated if Emergency Services responded.
3. PERS provider gathers information from requestor:
 - a. Name, title, organization representing, [identifying credential], contact information
 - b. Description of event
 - c. Description of information requested (Names? Address? Telephone #'s?)
 - d. Intended use
 - e. Affected zip codes
 - f. Requested response time
4. Information is sent by PERS provider first contact to contact/group designated by PERS provider reviews request [consistent with timelines].
5. Subpoena provided if possible (via email or fax)
If subpoena not available, PERS provider verifies the identity of the requestor and the legitimacy of the request via:
 - a. ANI match with PSAP;
 - b. Email from a domain associated with the local EMS/police;
 - c. In the event of a telecom outage, a neighboring police department can vouch for the legitimacy of the request/requestor.

Discussion questions:

1. Philips policy includes the following:
“Note that it is the responsibility of the caller to secure the permission of the subscriber(s) in question”
Would it be possible to address with a blanket authorization at time of sign up: “in the event of emergency situation that renders my system non-operative, if first responders request my name, address, and contact information I authorize that information to be shared”
2. The issue of who serve as primary contact for PERS providers requires further discussion.
3. The Philips policy would have helped in the San Juan situation. How would it work in a much larger, regional emergency?
4. Other concerns?

5. Proviso item: Privacy protections for participants in the program

DSHS indicated on the October 3 call that if the shared information was limited to name, address, and contact information of subscribers, any HIPPA concerns would likely be minimal-to-nonexistent. First responders clarified that they are bound by HIPPA to protect confidential information and have procedures in place to do so.

Discussion questions:

1. Assuming a method for provision of permissions can be identified as outlined below, is anything else needed?

6. Proviso item: A process whereby vulnerable life alert and emergency alert customers may provide permission for their information to be shared in the event of an emergency

Discussion Questions:

1. From above: Would it be possible to address with a blanket authorization at time of sign up: “in the event of emergency situation that renders my system non-operative, if first responders request my name, address, and contact information I authorize that information to be shared”
2. Other suggestions.

7. Proviso item: Liability protections for agencies that collect, maintain, and track information

Discussion

8. Next Steps

Meeting 3 – November 13, 2014, 1:00 – 3:00 p.m.

Personal Emergency Response Workgroup

Agenda

Conference Call Bridge (360) 407-3780
PIN 378235#

- 1) Introductions**
- 2) Review summary of October 28 conference call**
- 3) Review of report draft**
- 4) Next Steps**

APPENDIX C

Workgroup Meeting Summaries

Meeting 1

Personal Emergency Response Workgroup

October 3, 2014, 1:00 to 3:00 (Pacific)

CALL SUMMARY

In Attendance: Dan Murphy, Kristine Glasgow, and Michael Dunckel, Northwest Regional Council; Barbara Hanneman, Home and Community Services; Michael Tracey and Barry Nyer, Phillips; Richard Bangerten, Rescue Alert; Sheriff Nou and Robin DeLaZerda, San Juan County Sheriff's Office; Chief Gaddis, City of Normandy Park Police Department; Chief Green, City of Oak Harbor Police Department; William Bridges and Sydney Forrester, Legislative Staff; Sierra Rotakhina, Washington State Board of Health; Rob Makin and Jean Cantrell.

Overview

Dan Murphy began the call with introductions and an overview of the work group's purpose. He explained that a bill was proposed last session in response to issues that arose as a result of a telecommunications outage in San Juan County. The bill did not pass, but a proviso was established calling for (ESSB6002): Area Agencies on Aging to convene a work group to include first responders and companies providing life alert or other emergency alert services and to develop a proposal on how vulnerable adults who have life alert services might be made known to first responders in the event of a long-term power or telecommunications outage. Northwest Regional Council volunteered to facilitate the work group with focus on the shared goal of protecting vulnerable adults in emergencies.

Background

Sheriff Nou and Robin DeLaZerda of the San Juan County Sheriff's Office provided background on the events in their county. During November of 2013 a fiber optic cable underwater broke about a mile off shore, disrupting landline communications to the islands. They had some limited communications capabilities on each island, but were not able to communicate off island. Local 911 calls could not reach the dispatch center. They mobilized their dispatch personnel and utilized local fire stations as dispatch centers. The outage lasted ten days.

With the loss of long distance links, PERS (Personal Emergency Response Systems) as well as other alarm systems were not functional. Dispatch, law enforcement, and the fire department worked together to develop response strategies. One of the priorities was to locate and check on vulnerable adults throughout the county, as they would have no way to call for help. Dispatch contacted many PERS providers requesting contact information for their subscribers in order to locate and check on them. Some providers provided information, some did not. Sheriff Nou explained that this event brought the issue of first responders needing to obtain contact information on vulnerable citizens to the forefront.

Richard Bangerten stressed that there are other issues that also need to be addressed, such as Washington State needing to provide redundancy in communications infrastructure. Richard also mentioned that individuals could register their contact information with local 911 or EMS call centers.

Discussion

Dan Murphy explained that there are approximately 9,000 Medicaid funded PERS subscriptions facilitated by Washington State Department of Social and Health Services (DSHS). The population receiving PERS services through Medicaid are the most vulnerable.

Barbara Hanneman of Home and Community Services reported that during the summer of 2014, DSHS added language to the PERS vendor contracts that includes “The Contractor shall provide the name, address and any other contact information necessary to verify the client’s well-being to emergency first responders on request in the event of natural disasters or other emergencies that render the alert system inoperable”.

There was some discussion regarding HIPAA and provisions in emergency circumstances.

Michael Tracey of Phillips said that they have always worked with PSAPs (Public Safety Answering Points) throughout the country. One of the issues that arose during the 2013 San Juan County event is they were unable to confirm the legitimacy of the request. As a result of the event, Michael developed a new Phillips policy regarding responding to requests for information. It includes specific actions to be taken in the event of an emergent request. The policy was provided to the work group for review.

Sheriff Nou asked if the November event would have been considered an emergency under the new policy. Michael Tracey said it would. Robin with dispatch said that the new policy should address the concerns for access to information.

Dan Murphy suggested considering making the policy an industry standard.

Barry Nyer said that it can be difficult to require standards of a volunteer industry association. What they can do is educate members on best practices.

Dan Murphy asked how San Juan County dispatch determined who to call to gather the PERS subscriber contact information. Robin said that she started with vendors that had contacted them in the past to respond to subscribers possibly needing assistance. She also looked on the internet and contacted 28 monitoring centers.

Dan Murphy asked when enrolling a subscriber, what the documentation includes regarding sharing of their information. Richard explained that the form includes a place for listing all parties (relatives or others) that could be contacted in case of an emergency. Robin asked if the list includes 911. He said yes the form does include 911 as a possible contact. Phillips also confirmed that 911/EMS is also on their contact form.

Dan Murphy said that first responder organizations must get a lot of protected information. How is the information they receive protected? All first response organizations are bound by HIPAA.

There was additional discussion around HIPAA. Some questions arose around what information is protected and what changes in an emergency.

Barry Nyer said that they could forward the information to the association and educate members on the merits and benefits.

Richard Bangerten said that HIPAA is a very serious issue within their industry. There are several interpretations and varying policies surrounding the law.

Follow Up

- Determine who would be best for first response organizations to contact, vendor or monitoring center.
- Consider the confidentiality chain
- Review HIPAA regarding contact versus health information and emergencies.
- Indemnification
- Good Samaritan Law – how does it apply
- Richard and Barry can report on any discussions surrounding the topic at MAMA.
- Consider the method of sharing the information (what if faxing is not an option).

Meeting 2

Personal Emergency Response Workgroup October 28, 2014, 1:00 to 3:00 (Pacific) – (call 2 of 3) CALL SUMMARY

In Attendance: Dan Murphy and Kristine Glasgow, Northwest Regional Council; Debbie Johnson, Home and Community Services; Barry Nyer and Dan Felton, Phillips; Sheriff Nou, San Juan County Sheriff's Office; Chief Green, City of Oak Harbor Police Department; Mark Raaka, Skagit County EMS; and Rob Makin.

Introductions

Dan Murphy began the call with introductions and a review of the October 3rd workgroup call.

Follow-up Discussion from October 3rd Call

- **Additional question**

Dan mentioned that he received a question following the last call regarding implications for a larger incident or disaster. The potential sharing of PERS subscriber information is one of a variety of tools that could be used to identify vulnerable citizens that may need assistance. It would be up to first response organizations to access the information based on the situation.

- **Report back from MAMA meeting**

Barry Nyer of Philips reported on the MAMA (Medical Alert Monitoring Association) annual conference. MAMA has approximately 50 industry members, 30 of which are dealers and monitoring centers. Barry and Richard Bangerten attended the conference and raised the issues around privacy and sharing information. Barry reported that in general many support implementing an emergency protocol when contacted by a recognized PSAP (Public Safety Answering Point) requesting the information in an emergency. Being able to identify the caller as a central dispatch entity or PSAP is important. He did add that different organizations may have different protocols.

They do also suggest using additional methods to locate vulnerable citizens such as through AARP or Acxiom, a large marketing services (data) company.

They also encourage considering building redundancy into the communications infrastructure.

- **Potential for indemnification and applicability of the Good Samaritan Law**

Dan Murphy spoke with William Bridges, Legislative Staff, who had checked with the Legislative Affairs Director for the State AG. He in turn talked to some AAGs in the Torts Division and they recommend the following language: “This act does not create a private right of action nor does it create any civil liability on the part of the state or any of its subdivisions, including first responders [as defined].”

Sheriff Nou expressed concern that as potential legislation moves forward that liability under the public duty doctrine is not created, that it does not create a duty to act or any other unintended consequence.

- **Review of any new information on HIPAA applicability**

Barry reported that from the perspective of those that have been in the industry a long time, they are interested in continuing cooperative relationships with PSAPs. The industry appreciates the need for and benefit of the relationship.

Dan said that HIPAA no longer seems to be a concern. Chief Green added that there is no need for anything other than basic contact information, anything more could create barriers to sharing. He said they can gather what they need upon contact.

Debbie Johnson confirmed that DSHS has no HIPAA concerns with this situation.

Proviso item: Protocols and conditions in which the information would be shared

Discussion questions

5. Phillips policy includes the following:

“Note that it is the responsibility of the caller to secure the permission of the subscriber(s) in question”

Would it be possible to address with a blanket authorization at time of sign up: “in the event of emergency situation that renders my system non-operative, if first

responders request my name, address, and contact information I authorize that information to be shared”

6. The issue of who serve as primary contact for PERS providers requires further discussion.

Monitoring Centers were determined as the most appropriate contact for first response organizations to obtain subscriber information.

7. The Phillips policy would have helped in the San Juan situation. How would it work in a much larger, regional emergency? Answered previously.
8. Other concerns?

The new Philips policy, developed by Michael Tracy, provides clear procedures for identifying and responding to first responder’s requests for information. Many see it as the new national standard. It is important to keep in mind that there is no central governing body or authority to regulate what is good policy.

Proviso item: Privacy protections for participants in the program

Discussion question

2. Assuming a method for provision of permissions can be identified as outlined below, is anything else needed?

Proviso item: A process whereby vulnerable life alert and emergency alert customers may provide permission for their information to be shared in the event of an emergency

Discussion Questions

3. From above: Would it be possible to address with a blanket authorization at time of sign up: “in the event of emergency situation that renders my system non-operative, if first responders request my name, address, and contact information I authorize that information to be shared”

Sheriff Nou said that during the event that occurred in San Juan County, subscribers may not have known that their PERS system were not working due to the telecommunications outage.

Barry Nyer of Philips confirmed that their subscriber contract includes language regarding the subscriber's information may be referred to emergency responders if the monitoring center is not able to reach them for some reason.

The Department of Social and Health Services has added language to their contracts for PERS services requiring the contractor to, "Provide the name, address and any other contact information necessary to verify the client's well-being to emergency first responders on request in the event of natural disasters or other emergencies that render the alert system inoperable."

4. Other suggestions.

Proviso item: Liability protections for agencies that collect, maintain, and track information

Discussion

Next Steps

The draft report to the legislature will be sent to workgroup members to review and provide feedback during the final workgroup call on the November 13th.

The final report is due to the legislature on November 15th.

Meeting 3

Personal Emergency Response Workgroup November 13, 2014, 1:00 to 3:00 (Pacific) – (call 3 of 3) CALL SUMMARY

In Attendance: Dan Murphy and Kristine Glasgow, Northwest Regional Council; Michael Tracey and Dan Felton, Phillips; Sheriff Nou, San Juan County Sheriff's Office; Chief Green, City of Oak Harbor Police Department; Kevin O'Brien and Rita Harvey, Orcas Island Fire Department; and Rob Makin.

Introductions

Dan Murphy began the call with introductions and a review of the October 28th workgroup call.

Review of report draft

Dan guided the group through each section of the draft report, input for final revisions feedback.

The group confirmed agreement with the statement at the bottom of page 4 that the concerns related to HIPAA have been addressed. Sheriff Nou said the consensus that the interest was in obtaining subscriber contact information rather than protected health information subdued concerns.

Under the Liability section on page 5, it was suggested to add more information regarding the public duty doctrine and concern surrounding duty to act.

Next on page 5 is Cross Jurisdictional Communications. The group discussed the various ways a caller requesting the subscriber information could be identified. Additional input will be gathered from the San Juan County Dispatch representative, Robin.

Dan Felton of Philips recommended additional language regarding the cause of a subscriber's system not being operational to clarify in what situation their information may be shared.

Rob Makin was able to obtain a report from the Utilities Commission on telecommunications outages. The outage report will be included in the PERS Workgroup report as an appendix.

Workgroup members on the call provided permission to include the three workgroup call summaries as appendices in the report.

Next Steps

Minor revisions recommended by the PERS Workgroup will be made to the report. The report will be submitted to the Office of Financial Management and to the appropriate legislative committees by November 15, 2014.

APPENDIX D

DSHS PERS Contract Amended Statement of Work



CLIENT SERVICE CONTRACT

Personal Emergency Response System

Excerpt, Special Terms and Conditions, Section 2

2. **Statement of Work.** The geographic area in which the Contractor will provide the following services is XXX

The Contractor shall:

- a. Provide Personal Emergency Response System Services only as authorized in the client's Service Plan. Medication reminders may be included as part of PERS if the client meets the eligibility requirements described in the Special Terms & Conditions Definitions section of this contract and only if specified in the client's service plan as an addition to PERS.
- b. Provide equipment approved by the Federal Communications Commission and which meets the Underwriters Laboratories, Inc. (UL) or ETL (Intertek) standard for home health care signaling equipment. The UL or ETL listing mark on the equipment will be accepted as evidence of the equipment's compliance with UL or ETL standards.
- c. Provide an emergency response activator that can be activated by breath, by touch, or other means; the emergency response activator must be usable by persons who are visually or hearing impaired or physically disabled.
- d. Provide an emergency response communicator which does not interfere with normal telephone use when attached to the PERS Client's telephone line. The communicator must be capable of operating without external power during a power failure at the recipient's home in accordance with UL or ETL requirements for home health care signaling equipment with stand-by capability.
- e. Ensure monitoring agencies' equipment includes, at a minimum:
 - i. Primary receiver;
 - ii. Stand-by information retrieval system
 - iii. Separate telephone service when attached to the PERS Client's telephone line;

- iv. Stand-by receiver that is independent and interchangeable with the primary receiver;
 - v. Back-up power supply; and
 - vi. Telephone line monitor when attached to the PERS Client's telephone line.
- f. Ensure the monitoring equipment's clock printer prints out the time and date of the emergency signal, the PERS client's ProviderOne Client ID located on the client's medical Services Card and the emergency code that indicates whether the signal is active, passive, or a responder test.
 - g. The telephone line monitor must give visual and audible signals when an incoming telephone line is disconnected for more than 10 seconds.
 - h. Install the system within 5 business days of the request for service and remove it after receiving notice to discontinue the service. The Contractor shall not bill for services beyond the date the notice to discontinue was received.
 - i. Ensure the monitoring agency is capable of simultaneously responding to multiple signals for help; maintains detailed technical and operations manuals that describe PERS elements, including PERS equipment installation, functioning, and testing; emergency response protocols; and record keeping and reporting procedures.
 - j. Annually test the equipment for ten percent (10%) of current Clients.
 - k. Ensure that monitoring agency staff will be trained on operational and technical aspects of the PERS system. Training shall include testing procedures, emergency reporting and response procedures and servicing.
 - l. Ensure that monitoring agency staff are subject to and comply with the Contractor's requirements under this Contract for safeguarding of Client information.
 - m. Provide the name, address and any other contact information necessary to verify the client's well-being to emergency first responders on request in the event of natural disasters or other emergencies that render the alert system inoperable.

APPENDIX E

PHILIPS Request for Subscriber Data Policy

The below policy should be followed any time Philips Lifeline receives a request from a caller to release subscriber information for multiple subscribers (most commonly referred to as a subscriber list).

Frontline Policy

If you receive a request for a subscriber list of any sort, please transfer that call or forward the request to your Senior/Supervisor.

Senior/Supervisor Policy

First determine if the request for subscriber info is from a public entity (e.g., police department, central dispatch) or from a private entity or individual (e.g., senior living facility, private ambulance company). If the latter, inform the caller that Lifeline does not release subscriber information to private entities or individuals without the express permission of the subscriber. Note that it is the responsibility of the caller to secure the permission of the subscriber(s) in question – Lifeline will not proactively reach out to subscribers seeking permission on behalf of a private requestor.

For those requests which are from public entities, determine if the request for subscriber info is for an emergency or non-emergency situation.

Emergency Situation: Any situation where there is the potential for imminent death of or injury to a subscriber if Emergency Services fails to promptly respond to a situation. Emergency situations are urgent, time critical, and could possibly be mitigated if Emergency Services responded.

- Ex: Emergency Services requesting a list of subscriber's phone #'s and addresses to notify them about a serious flood warning.

Non-Emergency Situation: Any situation where the potential for imminent death of or injury to a subscriber is NOT present. The subscriber is NOT left at significant risk if Emergency Services does not promptly respond to the request.

- Ex: Emergency Services requesting a list of subscriber's addresses to make sure their database is up to date.

If the request involves an **Emergency Situation:**

- Get all the information you can about the situation. Some good questions to ask are:
 - What is your name, your title, the organization you are requesting the information on behalf of, and a good # at which to reach you?
 - What is going on?
 - What information are you requesting from us (Names? Address? Telephone #'s?)
 - How do you intend to use the requested information?
 - What zip codes is this impacting?
 - By when do you need the information?
- Please let the person know we will follow-up with them asap
- Send an email immediately to dl_pll_subdatarequest@philips.com with all of the above information you collected. Also schedule a conference call immediately with Danielle Clark, Tom Sullivan, Missy Quay, Jane Harris, Joe Stanton and Michael Tracey to discuss the situation (locate them on their cell phones if needed).

If the request involves a **Non-Emergency Situation:**

- Inform the requestor that while we would like to help them, we are unable to because Philips Lifeline's privacy policies prohibit us from disclosing confidential subscriber information without the express permission of the subscriber(s).
- Send an email about the situation to dl_pll_subdatarequest@philips.com. Be sure to include who you spoke to and a number at which we can reach them (if the Risk Team deems appropriate)

The Risk Team's Policy for Emergency Situations

- Meet to discuss next steps.
- If possible, call the requestor back on the # provided. Verify the # called is a valid Emergency Services or Law Enforcement #.
- Request a subpoena be sent to us if possible (via email or fax is sufficient)
 - If they are unable to provide a subpoena but we can verify the identity of the requestor and the legitimacy of the request, we may still be able to provide the requested information. Possible options include:
 - ANI match with PSAP;
 - email from a domain associated with the local EMS/police;
 - in the event of a telecom outage, a neighboring police department can vouch for the legitimacy of the request/requestor.
- Email dl_pll_subdatarequest@philips.com letting everyone know of the situation and give updates as they come about

The Risk Team's Policy for Non-Emergency Situations

- Review all incoming emails to dl_pll_subdatarequest@philips.com to ensure the right emergency versus non-emergency decision was made.
- Contact the requestor-to discuss the situation and to get a fax # or mailing address to send a letter explaining in writing why we can't fulfill the request.

Appendix F

WASHINGTON STATE UTILITIES COMMISSION - TELECOMMUNICATIONS OUTAGE REPORT

Company	Date of Outage	date of restoration	Report #	Location of Outage	# of Lines Affected	Duration of Outage	Data conversion	Services Affected	Cause of Outage	Outage Resolution Comment	News Articles
CenturyLink	11/5/2013	11/14/2013	wa.111513.001	Friday Harbor	13,415	245h 45m	24545	toll switch isolation, 911	under water fiber cut	fiber spliced to restore	
Qwest	12/14/2006		WA.061214.007	statewide	54,222	134 hours	13400	local loop	severe weather	AC power restored - service restored - access site with generator	Storm of 2006
Qwest	3/13/2011		wa.031311.001	Seattle	1,337	129h 30m	12930	local loop	wet cable	pulp cable dried & spliced to restore service	
CenturyLink	3/9/2013	3/13/2013	wa.031013.002	yakima	2,558	88h 3m	8830	ethernet/local loop	contractor bored through 1-2400 pair and 2-900 pair - human error	cable spliced to restore services	
Charter FiberLink	12/7/2007		----	statewide	unknown	79h 10m	7910	local - trunk grps	Qwest blocking calls	Overflow to Level 3 instead of Qwest	?
Qwest	3/24/2011		wa.032411.003	Seattle	1,715	75h	7500	local loop	submarine cables were stolen at risers	cable was replaced and spliced	
Qwest	5/6/2008		wa.080506.006	Seattle	1,346	68h 30m	6830	local	2700 pair copper pulp cable sawed through	PULP cable spliced	found nothing
Charter FiberLink	1/4/2008		----	Walla Walla	2,516	67h 13m	6713	Dial tone	wind gusts - 80mph	system restored when commercial power was restored	yes - see document
Qwest	2/24/2007		WA.070225.003	Seattle	1,500	54h 50m	5450	local	tree fell, knocked down pole - vandals cut cable	cable spliced	yes - Seattle PI
Qwest	11/7/2008		wa.081107.003	Tacoma	1,714	51h 30m	5150	local loop	damaged cable	PULP cable dried to clear trouble	
Verizon	9/2/2009		----	Bothell	1,000	48h - approx	4800		cable cut		
					81,323		4800				

Company	Date of Outage	date of restoration	Report #	Location of Outage	# of Lines Affected	Duration of Outage	Data conversion	Services Affected	Cause of Outage	Outage Resolution Comment	News Articles
Company	Date of Outage	date of restoration	Report #	Location of Outage	# of Lines Affected	Duration of Outage	Data conversion	Services Affected	Cause of Outage	Outage Resolution Comment	News Articles
Qwest	6/6/2007		WA.070605.005	Longview	1,486	42h 15m	4215	local loop	cables damages, under investigation	cables spliced	unable to locate
Verizon	7/17/2008		----	Lake Stevens	>1,000	39h 50m	3950	dial tone	severed cable		
Frontier	11/15/2010		----	Arlington, Index, Granite Fals	2,600	39h 25m	3925	local	storm	fiber splice	
Qwest d/b/a CL	1/18/2012		wa.011812.004	graham	1,656	35h 21m	3521	local loop	copper cable damaged - severe weather storm	PIC copper cable dried to restore service	
Qwest	3/27/2008		wa.080327.002	Spokane	1,264	34h 30m	3430	local loop	cable pairs out due to weather	cable pairs dried to restore service	
Charter FiberLink	12/17/2012	12/18/2012	----	pasco, richland & kennewick	2,948	32h 41m	3241	CPE / dial tone	sever weather caused commercial power outage	commercial power restored	
Qwest	8/4/2008		wa.080804.006	Yakima	1,180	29h 50m	2950	local loop	cut cable	spliced cable	
Qwest	1/7/2007		WA.070107.003	Yakima	8,076	29h 45m	2945	independent fiber cut - weather	Independent's outage	UNKNOWN	uable to locate
Qwest	11/7/2006			Crystal Mt.	750	28h 16m	2816	Toll - E911	flooding	fiber spliced	None
Charter FiberLink	1/1/2013	1/2/2013	----	Kennewick	7,412	25h 52m	2552	dial tone	loss of d/t due to RF Gateway fan falure	tech reseated fan tray	
Level 3	2/27/2010		----	Seattle		25h	2500		amp fuse blew		
CenturyLink	11/15/2010		----	gig harbor	1,600	25h	2500	voice and internet	commercial power outage (storm)		
Qwest	2/6/2009		wa.90206.002	Spokane	1,336	23h	2300	local loop	water	PULP cable spliced	

Company	Date of Outage	date of restoration	Report #	Location of Outage	# of Lines Affected	Duration of Outage	Data conversion	Services Affected	Cause of Outage	Outage Resolution Comment	News Articles
Charter FiberLink	9/21/2010		----	Kennewick	1,653	22h 20m	2220	fiber/dial tone, 911	truck hit fiber - causing 2 fiber cuts	repaired fiber	
CenturyLink	10/21/2010		----	Gig Harbor, Key Center, Vaughn	2,300	~ 21h 30m	2130	complete outage	commercial power outage & fiber issue	----	
Frontier	9/10/2012		----	chelan and surrounding area	4,990	19h	1900	all	fiber cut due to fire	fiber cable spliced	
Qwest	10/6/2009		wa.100609.002	Kent	1,643	18h 45m	1845	local loop	cable cut	pulp cable spliced	
Qwest	6/13/2007		WA .070613.004	Tacoma	1,130	18h 30m	1830	local loop	vehicle took down aerial cables	cable spliced	unable to locate
CenturyLink	11/22/2010		----	Gig Harbor, Anderson Is., Vashon Is.	1,400	18h	1800	voice and internet	Storm - force majeure		
CenturyLink	1/19/2012		wa.011912.003	Crystal Mt.	12,971	17h 55m	1755	toll and 911	fiber cut	spliced to restore service	
Frontier	2/3/2012			sultan	2,142	17h 21m	1721	local - no dial tone	road construction crew cut a fiber cable	fiber cable spliced	
Whidbey	1/25/2008		----	Saratoga	900	17h 20m	1720	local	vandalism		none
CenturyLink	10/22/2012	10/22/2012	wa.102212.003	cheney	50	17h 16m	1716	911 / toll	rodents	fiber spliced to restore	
CenturyLink	11/3/2010		----	Connell	3,100	15h 31m	1531	toll and 911	farmer trenching h2o line	splicing	
AT&T	9/22/2011		----	Spokane	1	15h 14m	1514	DS 3	fiber cut		
Toledo	9/13/2007		----	Lebanon, OR	1,000s	15h	1500	toll	fiber cut	fixed on Qwest's end	None
Frontier	8/26/2013		----	Niles	602	15h	1500		theft of copper and fiber cables	crews worked to repair the damage	
Charter FiberLink	7/8/2012		----	yakima, toppenish, union gap, wapato	1,956	14h 52m	1452	CPE / dial tone	severe weather	commercial power restored	
Verizon	4/15/2008		----	Curlew		~ 14 h	1400	toll	DOT crew cut fiber optic line (county crew)	damaged cable replaced	nothing yet - 4/16

Company	Date of Outage	date of restoration	Report #	Location of Outage	# of Lines Affected	Duration of Outage	Data conversion	Services Affected	Cause of Outage	Outage Resolution Comment	News Articles
Verizon	4/15/2008		----	Republic	960	~ 14 h	1400	toll	DOT crew cut fiber optic line (county crew)	damaged cable replaced	nothing yet - 4/16
Toledo	8/3/2009		----	Toledo	2,000	13h 55m	1355	all	Qwest's equipment	?	
CenturyTel	11/19/2012	11/19/2012	wa.111912.015	Lakebay	376	13h 51m	1351	toll isolation / 911	storms in area. AC power outage/circuit breaker tripped	reset circuit breaker	
Frontier	10/17/2013	10/17/2013	----	Naches & Nile	1,308	12h 58m	1258	toll	fiber cut in C-Link territory	C-Link repaired the fiber cut - all customers up and running	
Qwest	1/5/2007		WA.070105.005	Mason Co., Kla Che Min	2,332	12h 33 m	1233	call blocking, wireless 911, GH	OC-48 outage - fiber was cut between Shelton & Oly due to fallen tree - high winds	fiber spliced	uable to locate
CenturyLink	2/14/2014	2/15/2014	wa.021414.011	Chewelah	117	11h 40m	1140	911, switch	car accident	replaced repeater housing	
Charter FiberLink	4/26/2011		----	Walla Walla	2,109	11h 30m	1130	Dial tone/911	timing source down; failed line cards	timing source restored, line cards replaced	
CenturyLink	2/14/2014	2/15/2014	wa.021414.006	Cowiche	2,521	11h 24m	1100	911,toll isolation	fiber damage by sign co.	Techs completed splicing	
CenturyLink	11/22/2001		mw071745	Port Hadlock		11h	1100	911	possible CPE	replaced server blade	
Qwest	2/23/2008		wa.080223.004	Warden	18 strand fiber cut	10h 59m	1059	Toll	Qwest fiber cut - between Warden & Othello	fusion spliced 18 strand fiber	none
Verizon	6/5/2009		----	Camano Island	6,000	10h 50m	1050	voice, data, 911	fiber cut	spliced into another company's fiber to restore service to remainder of customers	
Charter FiberLink	2/23/2008		----	statewide	unknown	10h 45m	1045	dial tone	Qwest fiber cut - between Warden & Othello	Qwest personnel repaired fiber	none
CenturyLink	5/15/2013	5/15/2013	wa.051513.005	Wapato	3,000	10h 37m	1037	911 and toll	human error - contractor	cable spliced to restore services	
Qwest	8/27/2009		wa.082709.005	Omak	1,095	10h 24m	1024	local loop, 911	900 pr cable cut	cable spliced	

Company	Date of Outage	date of restoration	Report #	Location of Outage	# of Lines Affected	Duration of Outage	Data conversion	Services Affected	Cause of Outage	Outage Resolution Comment	News Articles
CenturyLink	4/4/2013	4/4/2013	wa.040413.003	morton	4,136	10h 24m	1024	toll, DSL	fiber optic cable cut	cable spliced	
Frontier	4/2/2013	4/2/2013	----	Woodland	1,766	10h 22m	1022	toll isolated	fiber cut	fiber spliced	
Frontier	11/2/2013	11/3/2013	----	La Conner, Anacortes, Concrete	5,422	10h 20m	1020	toll		tech replaced power supply at the channel bank	
Charter FiberLink	12/6/2008		----	Kennewick	6,393	10h 15m	1015	dial tone	loss of connectivity	reset servers & corrected IP scopes	
Qwest	8/23/2011		wa.082311.006	cle elum	3,215	10:01	0:00	toll/911	fiber cut	fiber spliced to restore	
Verizon	7/17/2008		----	Lake Stevens	>1,000	10 hours	1000	dial tone	severed cable		
CenturyLink	12/1/2012	12/1/2012	wa.120112.002	port townsend	9,583	9h 47m	947	toll isolation / 911	truck hit telephone pole	fiber spliced to restore	
Qwest	12/3/2007		wa.071204.001	Aberdeen	4,034	9h 39m	939	local	storm damage	fiber cable spliced	yes
Qwest d/b/a CL	2/16/2012		wa.021512.003	Hoodsport	1,819	9h 32m	932	toll isolation, 911	fiber cut/damage	fiber fusion spliced to restore	
CenturyLink	9/2/2010		----	Snoqualmie Pass	600 v, 200 DSL	9h 30m	930	all	cut fiber optic cable	new section and splice fiber	
Charter FiberLink	10/11/2008		----	Yakima	780	8h 7m	870	dial tone	IP routing line card failover	rebooted CMTS	
Whidbey	10/11/2006		NA	S. Whidbey/Hat Island	<14,000	8h 50m	850	Toll - E911 depending on connectivity	3rd party construction damage of 1 or more fiber optic cables		None
Qwest	4/2/2007		WA.070402.005	Warden & HWY 17 - Rural areas	16,128	8h 49m	849	Toll & 911	12 strand fiber cut	fiber fusion spliced to restore	unable to locate
Qwest	9/18/2007		wa.070918.007	Shelton/Belfair	1,611	8h 46m	846	interoffice facility	fiber cut	cables spliced	None
Qwest	6/20/2008		wa.080620.002	Bellingham	20,832	8h 40m	840	toll	fiber cut - under investigation	spliced 16 strand fiber	
Qwest	2/4/2013	2/5/2013	wa.020513.005	morton / orting	5,169	8h 39m	839	toll isolation - local loop	fiber cut	offnet fiber cut repaired	
Qwest	11/12/2007		wa.071112.002	Port Ludlow	unknown	8h 37m	837	interoffice facility	fiber cut	cable spliced	none

Company	Date of Outage	date of restoration	Report #	Location of Outage	# of Lines Affected	Duration of Outage	Data conversion	Services Affected	Cause of Outage	Outage Resolution Comment	News Articles
Qwest	11/28/2006		WA.061128.002	B-ham	1,172	8h 3m	830	local loop	weather - power outage to remote terminal (DLC)	service restored when AC power restored	None - several related to power outages & snow
CenturyTel	12/5/2006		NA	Kingston	unknown	8h 15m	815	Toll, E911, EAS to Silverdale, DSL & VM	48 Strand fiber in Port Gable cut by back hoe	Crews with replacement fiber to replace damaged section	None
CenturyLink	10/9/2012		wa.100912.004	Deer Park	1,537	7h 57m	757	local loop	cable cut by contractor	cable sliced	
CenturyLink	1/17/2011		----	Mattawa	450	7h 55m	755	no dial tone	high winds	realign antennas	
CenturyLink	1/17/2011		----	Mattawa	1,467	7h 55m	755	able to make local calls	high winds	realign antennas	
Qwest	3/10/2010		wa.030810.001	Olympia	1,502	7h 54m	754	local loop	cut cable	cable spliced	
CenturyLink	12/17/2013		wa.121713.001	Raymond/So . Bend	5,717	7h 42m	742	toll isolation	fiber cut by contractor	fiber spliced to restore	
Charter FiberLink	3/24/2008		----	Wenatchee	2,100	7h 2m	720	dial tone	Vz cable cut	rerouted traffic	
Qwest	6/28/2011		wa.062811.004	Castle Rock	3,314	7h 2m	720	toll switch isolation, 911	cut cable	fiber cable spliced	
CenturyLink	6/15/2013	6/16/2013	wa.061613.001	goldengate	1,161	7h 13m	713	local loop	cables failed due to AC power outage	AC power restored	
CenturyLink	2/27/2012		----	Kingston	1,200	< 7h	700	DSL/Voice, 911	fiber outage - contractor drilled thru one of the fibers going into Kingston	assuming it was spliced	
Qwest	12/13/2007		wa.071213.005	Crystal Mt.	712	6h 5m	650	switch isolation - 911	cut fiber optic cable	F.O. cable spliced	None
	2/7/2008		----	entire territory	2,200	6h 45m	645	Dial tone - local, LD, 911	software upgrade didn't take	equipment wiped clean, and older software rebooted	none
Charter FiberLink	11/6/2007		----	Richland	800	6h 4m	640	unable to reach toll free #s	toll carrier routing to a tandem that was not handling calls correctly	Level 3 made change to another tandem	none

Company	Date of Outage	date of restoration	Report #	Location of Outage	# of Lines Affected	Duration of Outage	Data conversion	Services Affected	Cause of Outage	Outage Resolution Comment	News Articles
Qwest	6/12/2008		wa.080612.003	Joyce	1,424	6h 38m	638	911, toll	cut cable - unknown	fibers spliced	
Qwest	9/18/2006			Pt. Ludlow	6,788	6h 27m	627	Toll	OC48 out	aerial fiber cable spliced	Yes - part of file
Qwest	12/27/2006		WA.061227.001	Olympia	1,623	6h 27m	627	unknown	24 strand aerial fiber was cut by unknown vehicle	cable spliced	unable to locate
Qwest	3/28/2007		WA.070328.004	Aberdeen	1,660	6h 27m	627		4 T3s down - Dirty DSX jack	tech cleaned DSX jack	unable to locate
Charter FiberLink	10/13/2007		----	area code 509	7,100	6h 25m	625	Dial tone	commercial power failure - power surge or lightning strike	restore power to router and reseating a fiber cable	none
CenturyLink	10/17/2013	10/17/2013	wa.101713.004	vader	1,765	6h 12m	612	toll switch isolation, 911	high speed multiplexer card	replaced high speed multiplexer card	
Qwest	8/4/2008		wa.080804.005	Auburn	1,497	6h 10m	610	facility	cut fiber cable	spliced fiber	
Rainier Connect	3/11/2010		----	Eatonville	1,508	6h	600	local and DSL	faulty card	replaced circuit card	
Charter FiberLink	2/9/2012		----	eastern Wa.	6,665	5h 53m	553	dial tone	fiber cut - vandalism	splicing	
Qwest	4/12/2007		WA.070412.004	Ephrata, soap lake, Quincy	16,128	5h 5m	550	Toll & 911	fiber cut	fiber spliced	unable to locate
CenturyLink	7/6/2011		----	multiple areas	23,000	5h 55m	550	LD and 911	truck snagged NOANET fiber cable o/s Bremerton Shipyard	cut and fused cable line	
CenturyLink	7/14/2010	7/14/2010	----	Morton/Mineral	3,600	5h 46m	546	misc. impact to LD	cut fiber during ditch cleaning by DOT	fiber spliced	
CenturyLink	7/14/2010	7/14/2010	----	Mineral	327	5h 46m	546	911, LD	cut fiber during ditch cleaning by DOT	fiber spliced	
Qwest	8/11/2009		wa.081109.007	Steamboat Island	1,010	5h 38m	538	toll	aerial fiber torn down	fiber cable spliced	
WaveBroadband	7/6/2011		----	Snohomish County	3,200	5h 37m	537	VoIP	accident caused fiber cut	report not required - filed by EMD	
Qwest	4/15/2009		WA.090415.003	Lacey	2,151	5h 36m	536	local loop	aerial fiber taken down by vehicle	cable spliced	

Company	Date of Outage	date of restoration	Report #	Location of Outage	# of Lines Affected	Duration of Outage	Data conversion	Services Affected	Cause of Outage	Outage Resolution Comment	News Articles
Qwest d/b/a CL	6/9/2012		wa.061912.002	coleville, wa	6,612	5h 24m	524	911/toll	cut cable	cable spliced	
Qwest	8/2/2011		wa.080211.005	winlock	1,924	5h 2m	520	toll/local/911	unknown	processor packs restored to restore service	
Charter FiberLink	12/30/2008		----	Kennewick	1,258	5h 15m	515	dial tone	fiber cut	re-routed traffic	
CenturyLink	12/18/2013		wa.121813.002	Easton	500	5h 12m	512	911,toll isolation	blown fuse caused rectifier failure	replaced blown fuse	
Whidbey	1/25/2008		----	Cultus Bay	1,500	5h (approx)	500	local			none
	6/19/2012		----	stevens county	???	5h	500	911 / internet	fiber cut	cable repaired / filed by EMD	
Frontier	11/7/2012	11/7/2012	#12-4221	skagit county	499	5h	500	??	bad card in CO	replaced spare cards - filed by EMD	
CenturyLink	8/2/2011			Sunnyside	20,000	5+ hours	500		fiber cut during light pole installation		Yakima Herald - Republic
CenturyTel	3/17/2008		----	South Bend	1,800	5 hours	500	toll	vandalism	techs pieced out the missing cable with a new cable	
Verizon	3/24/2008		----	Quincy / Soap Lake	4,900	> 4h 7m	470	911, local	cable cut	fiber repair / cable splice	
TDS	8/24/2009		----	LaCenter	5,700	4h 59m	459	outbound	fiber cut - Qwest	fiber spliced	
Qwest	7/12/2008		wa.080712.003	Aberdeen	48 trunks	4h 50m	450	degraded service on IC trunks	routing error	traffic routed to correct group to restore svc	
CenturyLink	8/3/2012		wa.080312.003	Spokane	9,096	4h 48m	448	switch isolation/911	fiber cut	spliced fibers to restore service	
Qwest	10/17/2010		wa.101710.001	Grand Coulee	2,226	4h 45m	445	toll	switch synchronization	switched to backup clocking source	
Qwest	9/26/2008		wa.080926.001	Walla Walla	1,390	4h 44m	444	none	cut fiber cable	spliced fiber cable	
Qwest	6/26/2007		WA.070626.001	Deer Park	17,472	4h 43m	443	911, toll isolation	leased cut fiber optic cable	splice cable	unable to locate
CenturyTel	8/10/2007		----	Connell	450	4h 40m	440	911, DSL, toll	fiber cut		unable to locate

Company	Date of Outage	date of restoration	Report #	Location of Outage	# of Lines Affected	Duration of Outage	Data conversion	Services Affected	Cause of Outage	Outage Resolution Comment	News Articles
Qwest	1/6/2007		WA.070106.005	Shelton	1,494	4h 35m	435	local loop	commercial power failure	gen. connected remote terminal site to restore svc.	uable to locate
CenturyLink	9/30/2011		2837085	gig harbor/vashon	501	4h 33m	433	voice	fiber cut		
CenturyLink	5/26/2009		----	Wilson Creek	315	4h 30m	430	toll		Grant PUD cut fiber & copper cable	
Verizon	8/24/2009		----	Woodland	4,000	~ 4h 30m	430	SS7 isolation, 911	fiber cut - Qwest		
CenturyLink	2/25/2010		----	Klickitat/skam	13,000	4h 25m	425	LD & wireless, H.S.I.	fiber cut - RR contractor drilling hole	cable spliced	
Qwest	7/26/2008		wa.080726.002	Yakima	1,358	4h 24m	424	local	power outage	repaired lite span power shelf and rectifier	
Frontier	6/9/2011		----	Snohomish County		4h 22m	422	911			
mcdaniel	7/6/2011		----	Salkum	2,332	4h 22m	422	long distance only	NOANET LD issue		
Qwest	9/11/2009		wa.091109.001	Spokane	9,946	4h 16m	416	911	unknown	PSAP restored - CPE	
Frontier	1/31/2013	1/31/2013	----	Republic	1,500	4h 11m	411	dial tone	broken fiber	spliced fiber	
Charter FiberLink	8/3/2008		----	Richland	1,049	4h 2m	402	dial tone	fiber damage - rodent	fiber repair / cable splice	
CenturyTel	10/9/2007		----	statewide	20,000	approx 4h	400	high-speed internet	fiber cut - s.w. of Gig Harbor		
CenturyLink	11/24/2009		----	Wilson Creek	320	4h approx	400	all	fiber damage		
TDS	12/22/2008		----	Grouse Flats	45	4h 0m	400		Equipment failure		
Charter FiberLink	4/9/2008		----	Wenatchee & Kennewick	4,534	4h	400	dial tone	fiber damage between Kennewick & Prosser	fiber spliced and traffic re-routed	
CenturyLink	1/14/2011		----	poulsbo	??	4 + hours	400	vm and internet	cut fiber (mud slide)		
Charter FiberLink	1/3/2013	1/3/2013	----	Kennewick	2,400	3h 6m	360	dial tone	loss of dial tone due to chassis configuration	reconfigured chassis	
Qwest	1/10/2008		wa.090110.002	Crystal Mt.	668 NALS	3h 5m	350	switch isolation - LD	fiber cut	spliced fiber to restore	

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Qwest	4/6/2007		WA.070406.008	Salkum	2,689	3h 48m	348	switch isolation - 911	Failed multiplexer card - OC12 service outages	replaced multiplexer high speed trnasmit card	unable to locate
CenturyLink	11/2/2010		----	lakebay / anderson ls.	1,407	3h 45m	345	voice and internet	company restoring fiber - contractors bumped into fiber cable	switched some fiber cables to restore service on internet and voice traffic	
CenturyLink	12/18/2010		----	Lake Alice	16	3h 45m	345	DSL	storm	generator / re-wired until power restored (comm. Power restorer Sunday 12/19 a.m.)	
Qwest	3/29/2007		WA.070329.001	Aberdeen	2,688	3h 4m	340	local loop	T3X4 svc. Outage - dirty fiber optic cable terminations	cleaned fiber optic cable terminations	unable to locate
Frontier	6/24/2011		----	skagit county	50	3h 40m	340		broken pedestal		
Qwest	11/27/2006		NA	Pt. Angeles	1,140	3h 37m	337	local loop	AC power failure	gen. connected to the DLC to restore svc.	None - several related to power outages & snow
Frontier	6/14/2012		----	La Conner	1,353	3h 35m	335	toll	??	techs reseated to DSO card	
Charter FiberLink	12/20/2012	12/20/2012	----	Kennewick	7,256	3h 32m	332	headend/dial tone	RF gateway fan failure / modules shut down	reaseated fan tray on RF gateway	
Verizon	5/5/2009		----	Kennewick	1,086	3h 3m	330				
Qwest d/b/a CL	1/15/2012		wa.011512.001	orchards OR/ Wa	2,048	3h 27m	327	local loop	switch module failure	switch module replaced	
centurytel of wa	2/5/2013		wa.020513.011	morton / orting	5,169	3h 25m	325	toll / voice	fiber cut	patch cables back into position	
Charter FiberLink	2/3/2009		----	Yakima	8,269	3h 20m	320	Dial tone/911	dirty fiber	cleaned fiber & resetting cards, adj. amps	
Qwest	4/28/2007		WA.070428.001	Spokane	5,760	3h 18m	318	interoffice facility	digital crossconnect anomaly	reconfigure cross-connects	unable to locate

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Frontier	9/5/2010		----	Kennewick	1,264	3h 18m	314	dial tone	DLP card in switch malfunctioned	tech dispatched and reset the DLP card	
Charter FiberLink	12/8/2012	12/8/2012	----	Kennewick	21,664	3h 14m	314	CMTS/dial tone	packet loss	rerouted traffic	
CenturyTel	4/16/2007		----	Hwy 2		3h	300	toll, DSL depending	power co. cut main fiber feed to all of Hwy 2 area		unable to locate
Verizon	10/22/2008		----	Kennewick	> 1,000	3h	300	dial tone	faulty card	circuit breaker restored	
CenturyLink	2/17/2011		----	Washington	???	3h	300	DSL	scheduled outage		
Charter FiberLink	5/15/2013	5/15/2013	----	Kennewick	2,000	3h	300	dial tone	loss of DT due to issues with the DEPI tunnels	engineers manually re-established the DEPI tunnels	
Qwest	12/17/2007		wa.071217.003	Crystal Mt.	756	2h 9m	290	switch isolation - 911	cut fiber optic cable	spliced F.O. cable	None
Charter FiberLink	3/6/2013	3/6/2013	----	grandview, granger, mabton, sunnyside, toppenish, wapato	2,067	2h 56m	256	switch / dial tone	unknown - centuryLink network - multiple T1s down in Kennewick switch	service restored while CL was attempting to isolate problem	
Rainier Connect	5/21/2010		----	Eatonville/Kapowsin	1,436	2h 55m	255	local and 911	switching software malfunction	resolved w/ assistance from equipment vendor	
Qwest	5/18/2007		WA.070518.001	Seattle	1	2h 54m	254	local loop	CPE - battery plant	original # of customers was 1344, but was only 1 - commercial bank	unable to locate
Qwest	10/30/2006			Auburn	1,500	2h 51m	251	local	vandalism	cable spliced	None
CenturyLink	3/25/2013	3/25/2013	wa.032513.003	east sound WA	439	2h 45m	245	911, voice	bad power supply	replaced bad power supply	
Charter FiberLink	12/12/2012	12/12/2012	-----	yakima	8,905	2h 42m	242	CMTS/dial tone	loss of DT due to fiber cut between Kennewick and Sunnyside	DT restored when engineers rerouted traffic to apre fiber - damaged fiber 2 B repaired	

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Charter FiberLink	8/8/2008		----	Kennewick	1,200	2h 40m	240	dial tone	commercial power outage affecting customer premises	service restored when commercial power restored	
CenturyLink	2/10/2011		----	statewide	?	2h 39m	239	internet	rerouted internet services		
Charter FiberLink	1/14/2013	1/15/2013	----	Kennewick	7,399	2h 35m	235	CMTS / dial tone	chassis configuration	reconfigured chassis	
Charter FiberLink	11/8/2012	11/8/2012	----	Kennewick	1,548	2h 31m	231	CPE / dial tone	commercial power outage to customer premises	power restored to equipment	
CenturyLink	2/28/2011		----	Crocker Remote	275	2h 30m	230	POTS & DSL	house fire next to remote		
?	10/29/2006		NA	Lewis County	unknown	2h 27m	227	911	unk	unk	
CenturyLink	10/23/2013	10/23/2013	wa.102313.001	Friday Harbor	5,831	2h 26m	226	toll switch isolation, 911	scheduled maintenance.	maintenance completed	
CenturyLink	10/22/2013	10/22/2013	wa.102213.001	Friday Harbor	5,831	2h 26	226	toll switch isolation, 911	scheduled maintenance.	maintenance completed.	
CenturyLink	11/23/2010		----	Preston	102	2h 18m	218	POTS	?		
Qwest	2/7/2013	2/7/2013	wa.020713.006	Rochester	3,339	2h 18m	218	911	failed card	replaced circuit pack	
CenturyLink	1/3/2014	1/3/2014	wa.010614.002	Cle Elum/Easton	2,629	2h 1m	210	911 isolated	translation error	translation error corrected	
MCImetro	4/27/2009		----	eastern Wa.	35,000	1h 55m	155	toll	fiber cut - spokane	cable spliced (?)	
Charter FiberLink	11/13/2012	11/13/2012	----	Walla Walla	1,847	1h 50m	150	CMTS/dial tone	maintenance / replace RFSW caused RF linecard to fail	maintenance completed and replaced RF linecard	
Frontier	12/28/2011		----	Kennewick	1,041	1h 46m	146	switch outage			
Charter FiberLink	1/4/2008		----	statewide	18,000	1h 45m	145	Dial tone	maintenance on a router	router reprogrammed	none
CenturyLink	11/12/2013	11/12/2013	wa.111213.003	chinook/wa	322	1h 40m	140	911 local loop	employee error	reconfigured	
Charter FiberLink	5/21/2012		----	Yakima	8,122	1h 33m	133	Dial tone/911	faulty fan tray	chassis fan tray replaced	
CenturyLink	1/25/2011		----	Carnation	250	1h 30m	130	POTS & DSL	OC3 cards		

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CenturyLink	7/9/2012		MW074524	stevens county	county wide	1h 30m	130	911	fiber cut - construction	cable repair / filed by EMD	
Qwest	10/12/2011		wa.101211.003	graham	2,787	1:30	0:00	toll isolation	fiber rearrange work	cut back to original state	
Charter FiberLink	12/23/2012	12/23/2012	----	Kennewick	7,488	1h 29m	129	headend/dial tone	RF gateway fan failure / modules shut down	reaseated fan tray on RF gateway	
Verizon	3/31/2009		----	Bothell	5,600	1h 28m	128	???	power interruption		
Charter FiberLink	3/4/2013	3/4/2013	----	Walla Walla	4,052	1h 27m	127	CMTS/dial tone	linecard failure in CMTS	tech & engineer powered linecards off and then on	
CenturyLink	2/18/2014	2/18/2014	wa.021814.001	South Bend/Raymond	2,982	1hr 20m	120	toll isolation	employee error	reset common cards in mux	
Qwest	9/30/2008		wa.080930.001	Joyce	1,267	1h 19m	119	911 only	unknown	911 calls rerouted to restore svc.	
Qwest	8/2/2009		wa.080209.001	Renton	157	1h 15m	115	remote switch	commercial power failure	connected portable generator to remote terminal to restore service	
Frontier	1/16/2013	1/16/2013	----	Clearview	2,500	1h 12m	112	toll	under investigation	----	
Charter FiberLink	9/4/2012		----	Kennewick	5,151	1h 8m	108	CMTS/dial tone	loss of dial tone due to failed RF linecard in CMTS	engineers reselaed fan tray	
Charter FiberLink	7/28/2012		----	Richland	1,000	1h 5m	105	headend/dial tone	tripped circuit breaker	breaker reset	
Charter FiberLink	12/5/2007		----	Yakima / Kennewick	unknown	1h 2m	102	all circuits busy	trunks not overflowing properly	initiated overflow trunking	None
CenturyLink	2/15/2011		----	gig harbor, montesano & cheney	???	30 m to 1 hr	100	DSL	scheduled outage		
CenturyLink	2/9/2010		----	Othello	1,716	~ 1h	100	911, toll	Qwest fiber cut	cable spliced	