March 15, 2019

Mr. Bob Ferguson
Washington State Attorney General
PO Box 40130
Olympia, WA 98504-0100
911outage@atg.wa.gov

Re: December 2018 9-1-1 Outage Impact on People with Disabilities

Dear Honorable Bob Ferguson,

The Coalition on Inclusive Emergency Planning (CIEP), under the Washington State Independent Living Council (WASILC), is a statewide, cross-disability, advisory group that works with state and local stakeholders to build disability accessibility and inclusion into all aspects of emergency management. CIEP provides technical advice on access and functional needs in the areas of effective communication, physical and programmatic access, and fosters working relationships among emergency managers. Our stakeholders are local people with expert advice for inclusive practices and technical training in all aspects of The Americans with Disabilities Act.

WASILC is a governor-appointed, statewide council that represents a broad range of individuals with disabilities from diverse backgrounds that are knowledgeable about Independent Living Services. The majority of the Council Members are individuals with disabilities. WASILC promotes a statewide network supporting the Independent Living Philosophy for people with disabilities through advocacy, education, planning, and collaboration.

On December 27, 2018, large areas of Washington State and six other states experienced a 12-hour service outage on the CenturyLink network. While we have no knowledge of specific reports from 9-1-1 callers with disabilities in Washington, CIEP and WASILC offers an impact statement of the 9-1-1 outage on
people with disabilities. According to the 2010 Census, 12.9% of the population in Washington State live with a disability. Although the impact statement is addressed to you, this document is also shared with other interested parties in Washington State and across the country.

WHAT HAPPENED

- EMD sent out a statewide WEA alert for the first time to let us know that the 911 system was down throughout Washington State. It was widely reported in the local news media and through community notification systems from different counties.
- Upon receiving a list of ten-digit telephone numbers for call centers in their area from local emergency management, people were forced to hunt for the emergency number specific to their location. It is easier to use a 3-digit number than a regular telephone number, especially for children and others with mobility and cognitive disabilities.

IMPACT ON TELECOMMUNICATION RELAY SERVICES

- When relay services receive a 911 call from a deaf or hard of hearing person, they verify the caller’s location. If the caller is not at the location listed in their relay profile, the relay operator checks a national database for a ten-digit number at the most appropriate 911 call center based on the address given by the caller.
- When calling the relay, a 911 call automatically moves to the top of the queue so it is answered by the next available interpreter. If a ten-digit number is used, it is treated like a regular number and answered in turn. Suggest that deaf people using the relay to dial 911 and then inform the interpreter about the ten-digit number for the location.

IMPACT ON TEXT TO 9-1-1

- The good news is that landline calls and Text to 911 remained functional throughout the outage so if technical problems prevent you from making a voice call to 911, texting is usually successful (where available). In Washington State, Text-to-911 is only available in 13 out of 39 counties.
• Since wireless phones are mobile, they are not associated with one fixed location or address. While the location of the cell site closest to the 911 caller may provide a general indication of the caller's location, that information is not always specific enough for rescue personnel to deliver assistance to the caller quickly.
• When someone attempts to text to 911 in areas where it is not available, an automatic error message is sent back stating that Text to 911 is not available, and to call 911 using a different method.
• If an emergency occurs near a jurisdictional border, some texts may be inadvertently sent to a call center in a neighboring jurisdiction, unless no text service is available.
• The only thing to remember here are possible delays in sending and receiving messages. The 9-1-1 agency processes text messages the same way as the voice calls however the 9-1-1 will not be able to hear any background noises while on text. Texts to 9-1-1 does not work any faster than texts to another mobile phone. Texting is a welcome new option because the legacy telephone networks that support analog TTYs are becoming obsolete.

LONG-TERM IMPACTS

• Text-to-911 is the first step as the nation migrates to Next Generation 911 (NG911) services where we will eventually be able to use video, text, voice and data to send information to 911 from our phone or computer. In NG911, if the caller is unable to speak English, an interpreter will be provided by the call center.
• Future text-to-911 improvements will include:
  o Location finding that can show where the call is coming from within three meters/ten feet and if in a building with multiple levels like an apartment or office, which floor; and
  o Real-Time Text that allows the other person to read letters while they are being typed instead of waiting for a full block of SMS text.

This document is to assist you in ensuring that 9-1-1 and other emergency management services fully account for the access and functional needs as you serve the whole community in preparation, response, and recovery from national and man-made disasters in Washington State.
Attached is the recent issue of the **CIEP Alert** quarterly newsletter that includes more details about the 9-1-1 outage. CIEP is available to provide technical assistance in the areas of effective communications, programmatic access, and physical access.

Thank you for your time.

Sincerely,

/s/

Jim House, Disability Integration Manager

cc:

- **WA State Independent Living Council**
  - Kimberly Conner, Executive Director [connekb@dshs.wa.gov](mailto:connekb@dshs.wa.gov)
- **WA State Enhanced 911 Advisory Committee**
  - JoAnn Boggs, Chair [j boggs@pendoreille.org](mailto:j boggs@pendoreille.org)
- **WA Emergency Management Division**
  - Lewis Lujan, LEP Coordinator [Lewis.Lujan@mil.wa.gov](mailto:Lewis.Lujan@mil.wa.gov)
- **WA State Office for the Deaf and Hard of Hearing**
  - Steve Peck, Program Manager [pecksc@dshs.wa.gov](mailto:pecksc@dshs.wa.gov)
  - Debbie O'Willow, Executive Director [owillmd@dshs.wa.gov](mailto:owillmd@dshs.wa.gov)
- **WA Department of Health, Inclusive and Equity Subcommittee**
  - Michael Loehr, Chief of Emergency Preparedness [Michael.Loehr@doh.wa.gov](mailto:Michael.Loehr@doh.wa.gov)
- **City of Seattle Human Services**
  - Deborah Witmer, Vulnerable Populations Planning Coordinator [deborah.witmer@seattle.gov](mailto:deborah.witmer@seattle.gov)
- **King County 911**
  - Kayreen Lum, Outreach and Training Specialist [kayreen.lum@kingcounty.gov](mailto:kayreen.lum@kingcounty.gov)
- **Pierce County Emergency Management**
  - Nicole Johnson, Planning, Mitigation, and Recovery Supervisor [nicole.johnson@piercecountywa.gov](mailto:nicole.johnson@piercecountywa.gov)
  - Serina McWha, Access & Functional Needs Coordinator [serina.mcwha@piercecountywa.gov](mailto:serina.mcwha@piercecountywa.gov)
• American Red Cross, Northwest Division
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• National Council on Independent Living, Emergency Preparedness Subcommittee
  o Todd Holloway, Chair toddh@cfisouth.org
• National Emergency Numbering Association, Accessibility Committee
  o Donna Platt, Co-Chair donna.platt@dhhs.nc.gov
  o Richard Ray, Co-chair richard.ray@lacity.org
• National Association of the Deaf
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• Telecommunications for the Deaf and Hard of Hearing, Inc.
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• Northwest ADA Center
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• Partnership for Inclusive Disaster Strategies
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• Federal Communications Commission, Consumer and Governmental Affairs, Disability Rights Office
  o Suzy Rosen Singleton, Director Suzanne.Singleton@fcc.gov
• Federal Emergency Management Agency, Office of Disability Integration and Coordination
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