

## Neal, Barbara

---

**From:** White, James G <James\_White3@comcast.com>  
**Sent:** Wednesday, July 29, 2020 3:33 PM  
**To:** Neal, Barbara  
**Subject:** RE: Draft Outage Notification Rule for 7/30/20 911 Board Meeting / Short Comcast Comment

**EXTERNAL SENDER: Do not open attachments or click on links unless you recognize and trust the sender.**

Good afternoon Barbara. I wanted to get you feedback before the Board's meeting tomorrow AM.

As you know, Comcast opposes the addition of an initial report within one hour. Nevertheless, Comcast has a couple of comments:

- Regarding new section 4.3.1 that incorporates that initial "one-hour" report, the words "to the extent known" should be included as they are in 4.3.2 and 4.3.3. The language of 4.3.1 appears to allow reporting of zip and/or geographic info depending on what is available. That flexibility should be allowed in the initial report.
- In section 4.3, the word "material" should be substituted for "additional" so that incessant reporting of minor updates is not required.

Comcast may have further comments on the draft rule in the future.

Regards,

Jim White

James White  
Senior Director Regulatory Affairs  
Comcast Cable  
95 Wexford Street  
Needham, MA 02494  
781-400-1686  
617-279-5593(cell)

---

**From:** Neal, Barbara <Barbara.Neal@vermont.gov>  
**Sent:** Wednesday, July 29, 2020 11:57 AM  
**To:** Alexandra Herman <jessica.herman7@t-mobile.com>; Cohen, Andrea <acohen@vermontelectric.coop>; Ann Vanneman <avanneman@vermontel.net>; Annette Smith <pursebox@vermontel.net>; Austin, Jeffrey (Jeffrey.Austin@consolidated.com) <Jeffrey.Austin@consolidated.com>; Ben Byrd <bbyrd@fh2.com>; Benjamin Aron <BAron@ctia.org>; Otley, Brian <brian.otley@greenmountainpower.com>; Brown, Victoria <vbrown@vermontelectric.coop>; Cecile G. Betit <cgbetit@vermontel.net>; Storrow, Chuck <chuck@leoninepublicaffairs.com>; Chowaniec, Michael A <Michael.Chowaniec@charter.com>; CHRISTOPHER RICE <chris@mrvt.com>; Cummings, John J <John.Cummings@charter.com>; "Dylan Zwicky <Dylan@leoninepublicaffairs.com>" <DylanZwicky <Dylan@leoninepublicaffairs.com>; Geoffrey Why <gwhy@verrill-law.com>; Gordon Mathews <gmathews@vermontel.com>; Hans Eysenbach <heysenbach@verrill-law.com>; James Gibbons <jgibbons@burlingtonelectric.com>; Jean Hawley <jhawley@fh2.com>; Kennedy, Jeanne <jbkennedyllc@comcast.net>; Jonathan Gibson <jgibson@vermontel.net>; Lee, Stephanie S <stephanie.s.lee@verizon.com>; Martha Sirjane <caravangardens@gmail.com>; McHugh, Patrick (Patrick.McHugh@consolidated.com) <Patrick.McHugh@consolidated.com>; Melissa Bailey <mbailey@vppsa.com>;

Michelle Painter <michelle.painter@t-mobile.com>; Nancy Malmquist <NMalmquist@drm.com>; Nora Healy <nhealy@verrill-law.com>; Oski, Jessica <oski@necrasongroup.com>; Paul Phillips <pPhillips@primmer.com>; Peter Rossi <prossi@vermontelectric.com>; Robert Dostis <dostis@greenmountainpower.com>; Shultz, Mike <Mike.Shultz@consolidated.com>; Stacey Briggs <stacey.briggs@t-mobile.com>; Stephen Whitaker <whitaker.stephen@gmail.com>; Town of Shrewsbury <snicholson@vermontel.com>; Switzer, Sandi <townadmin@wallingfordvt.com>; White, James G <James\_White3@cable.comcast.com>

**Subject:** [EXTERNAL] Draft Outage Notification Rule for 7/30/20 911 Board Meeting

**Importance:** High

Good Morning All,

Attached is the latest draft of the Board's Outage Notification Rule. This version contains the following revisions:

Section 3.8: The numbers (1) and (2) were changed to (A) and (B) for consistency with other similar references in rule.

Section 4.1: Added the words "...in a served geographic area within Vermont, such as a town or community..." as discussed during 7/28 Board meeting.

Section 4.3: Added language regarding requirement for initial notification within one hour of discovery of outage and a second notification within two hours, as discussed at 7/28 Board meeting.

Sections 4.3.1 and 4.3.2: Revised to indicate what information is required for initial and second notifications. Also includes minor revisions to some wording for consistency with other sections.

Section 4.3.3: Added "exempt from public disclosure" to requirement to send call back numbers as discussed at 7/28 Board meeting.

Section 4.5: Added reference to "OCO" and "WSO" in place of more generic word "outage", for clarity.

Section 6.1: Updated references to certain subsections of rule.

Section 8.1: Wording revised on recommendation from legal.

This draft will be considered and possibly acted upon at a Special Meeting of the Board on Thursday, July 30, 2020 at 10 AM. Meeting details can be found [here](#).

Thank you.

**Barbara Neal**  
**Executive Director**  
**Vermont Enhanced 911 Board**  
**Montpelier, VT 05620-6501**  
**802-828-4911**