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**State of Vermont
Public Utility Commission**

MEMORANDUM

To: Parties in PUC Case Number 8850; Vermont Enhanced 911 Board
From: Micah Howe, Hearing Officer 
Re: Request for Comments
Date: January 9, 2019

On January 7, 2019, Stephen Whitaker filed a public comment by email with the Vermont Public Utility Commission (“Commission”).

Mr. Whitaker’s comment questions the pending motion for confidential treatment filed by the Telephone Operating Company of Vermont LLC doing business as Consolidated Communications (“Consolidated”) and includes a transcript of a public meeting of the Vermont Enhanced 911 Board held on October 30, 2018. Mr. Whitaker specifically references transcript pages 13-19, which include a discussion by the E911 Board of “isolation vulnerabilities” in the network operated by Consolidated.

Based on the E911 Board’s discussion, the causes of the isolation vulnerabilities appear to be unrelated to the causes of the network disruption events that are the subject matter of this investigation. It also appears that the E911 Board is currently investigating potential solutions to the isolation vulnerability problem and has briefed the Vermont Legislature’s Joint Fiscal Committee on the issue and potential solutions.¹

To ensure its understanding is complete, the Commission requests comments from the parties addressing the following issues and questions:

- Any additional response that the parties wish to provide to the issues raised by Mr. Whitaker regarding the confidentiality of the redacted information in the Interisle Report;
- Whether the network upgrades that Consolidated is implementing pursuant to the Stipulation of Settlement in this investigation will address the isolation vulnerabilities discussed at pages 13-19 of the E911 Board meeting transcript;
- If the stipulated network upgrades will not address the isolation vulnerabilities discussed by the E911 Board, whether the isolation vulnerabilities discussed by the E911 Board involve issues within the jurisdiction of the Commission to address;

¹ See *Redundancy and Resiliency in Vermont’s 9-1-1 System*, Report to Joint Fiscal Committee from the Vermont Enhanced 911 Board, submitted August 31, 2018.

- If the issue is within the Commission's jurisdiction, what steps are being taken or will be taken to address the isolation vulnerabilities and whether Commission involvement is currently or will be required; and
- Whether this investigation docket (Docket 8850) is an appropriate proceeding to address the isolation vulnerabilities.

The Commission also invites comments from the E911 Board on the above issues to the extent that it wishes to submit any. Please provide any comments on or before January 23, 2019.

PUC Case No. 8850 - SERVICE LIST

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