

January 13, 2010

Dear Commission Members,

I am writing in response to the request for comment on Application No. P911-019/PI-118. The primary issue I wish to address is the allowable costs for the PSAP in the proposed cost model.

First, it needs to be noted that it is virtually impossible to separate wire line and wireless 911 calls in a communication center. It is not possible to have separate dispatcher/call takers or equipment to handle each type of call. In the items addressed below, a percentage of wire line vs. wireless calls received could be used to justify the use of wireless funds

**Personnel:** Wire less 911 has had a substantial effect on the workload of communicators. Calls are received from a broader population base it is not necessary to be next to a phone to call 911 anymore. More people have more cell phones and that number increases daily. An event that would generate 1-2 calls in the past can now generate 5, 10 or even more depending on the location and time of day. Cell phone signals are also less reliable so communications officers deal with calls that are placed and then dropped before being answered. Abandoned calls are an issues; every call must be satisfactorily processed. If someone calls 911 and hangs up or the buttons are pushed in a pocket or purse and call 911, someone must call back and determine whether or not an emergency exists. This additional workload requires an increase in personnel to handle the calls that are coming in. As NG-911 becomes a reality there will be text and video and telematics that also have to be processed. It is my belief that staffing is a crucial part of handling wireless 911 and a portion of the money should be allowable for personnel costs.

**Equipment:** Certain pieces of equipment are an integral part of receiving and processing all 911 calls and cannot be separated depending on the type of call received. A portion of the costs related to computer aided dispatch and logging recorders should be allowable expenses. With the advent of wireless 911, handling calls has become much more complicated. Communications officers must process data, interface with first responder's mobile equipment and have call recordings available to review for a variety of reasons. All of these are functions required for quick and accurate response to wireless 911 calls for assistance.

Training: Please consider adding personnel training costs to the list of allowable expenses from the wireless 911 fund. As described above, the difficulty and variety of tasks expected from a communications officer are many. Processing wireless 911 calls is much more complicated than handling landline calls. A landline call is a fixed address on a map; answer the call and dispatch a response. Wire line calls present an assortment of issues that must be recognized and the dispatcher must be prepared to handle them all. As stated above false calls and hang-ups must be called back, calls with no location information must be tracked down through the wireless carriers and a dispatcher must understand the technical aspects of Voip calls, phase I and phase II, GIS data and much more. As technology evolves, more training will be required to process these calls and training for additional personnel as the work load increases.

I appreciate the opportunity to comment on the development of the cost model and I hope you will consider these points during this process. Please give the PSAPs the tools needed to provide the citizens of our community and state with the best trained and equipped communications officers that we can.

Sincerely

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