



## GRAND ISLAND - HALL COUNTY

EMERGENCY MANAGEMENT • COMMUNICATIONS

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**Response to Nebraska Public Service Commission**  
Order Opening Docket and Seeking Comment  
Application No. 911-019/PI-118

Date: September 1, 2009

This letter is in response to the request for comment by the Public Service Commission assigned as Application Number 911-019/PI-118 regarding a mechanism for determining the level of funding available to each public safety answering point and wireless carrier for costs determined to be eligible by the commission and the policies, procedures and method of accounting these funds.

### **Mechanism Permanency**

First, it is our recommendation that Wireless 911 Support Allocation Model become permanent and we suggest that the state government institute whatever policy, protocol, order, or legislation that would make it so. PSAPs must have confidence in the long-term reliability of this funding mechanism in order to make sufficient plans for the future.

### **Model Transparency**

In order to properly account for future income and expenditures resulting from the establishment of the 911-SAM, the Commission should advise each PSAP of the forecasted incomes as well as all current expenses, contracts, or maintenance agreements that will be passed onto the PSAP in sufficient time to make those budgetary plans.

### **Proxy Amount Calculation**

We recommend that the data inputs used for the proxy amount calculations be reviewed annually to account for changes in populations, wireless activity and so on. The Commission should provide this new calculation to the PSAPs by May 1 of each year to allow ample time for proper budgeting in the summer and fall.

### **Frequency of Funding**

We recommend that the PSC distribute these funds directly to the PSAP on a monthly basis.

### **Eligible PSAP Costs**

We recommend that eligible PSAP costs should follow Neb. Rev. Stat. 86-465 (2) which states:

- (b) Costs incurred or to be incurred by public safety answering points to implement enhanced wireless 911 service may include, but not be limited to, purchases of new equipment, costs of upgrades, modification and personnel

training used solely to process the data elements of enhanced wireless 911 service, and maintenance costs and license fees for new equipment;

(c) Costs incurred or to be incurred by public safety answering points for the purchase, installation, maintenance, and operation of telecommunications equipment and telecommunications services required for the provision of enhanced wireless 911 service;

We believe that "operations" as listed in this section includes PSAP personnel costs to answer, dispatch, maintain, update, upgrade, and manage the records of wireless 911 calls. With these funds, PSAPs should be given responsibility for all future procurement of new equipment and software which are sufficient to meet the individual needs of their jurisdiction.

#### **Eligibility of Shared Wireless & Landline Costs**

We recommend that eligibility also includes all cases where purchases of new equipment, upgrades, modification, maintenance, personnel, training, or any other cost which would have a shared applicable benefit to both wireless and landline 911 calls.

#### **Planning for Future Capital Outlay**

The Grand Island Emergency Communications Center recognizes that technological advances in communications may require the purchase and/or upgrade of current 911 systems to order to accommodate text (SMS) messages, images, video or other yet to be developed methods of communication similar to the way that wireless Phase II has required technological upgrades in the recent past.

We recommend that PSAPs be allowed to set aside monies from the model in separate in order to accomplish costly upgrades when necessary for their jurisdiction.

We thank you for this opportunity to express our findings on this matter and look forward to a resolution by the Public Safety Commission.

Sincerely,

A handwritten signature in black ink, appearing to read "Jon Rosenlund", is written over a rectangular area of the document that has been shaded with a fine grid pattern.

Jon Rosenlund, Director  
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