



GRAND ISLAND - HALL COUNTY

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Response to Nebraska Public Service Commission

Amended 9-1-1-SAM Model and Application

Application No. 911-019/PI-118

Date: January 11, 2010

The Grand Island Emergency Center has carefully reviewed the Wireless 9-1-1 Support Allocation Model (9-1-1-SAM) released by the Public Service Commission on December 15, 2009. The Grand Island Emergency Center wishes to express concern that the eligibility requirements defined by the amended model are far too restrictive and do not reflect the actual costs of providing wireless 9-1-1 services and the needs experienced by PSAPs to meet the growing call volume that wireless 9-1-1 has generated.

Eligibility of Personnel & Training Costs

It is the opinion of this PSAP that "*operations*" as listed in NRS 86-465 (2) includes PSAP personnel and training costs to properly answer, dispatch, maintain, update, upgrade, and manage the records of wireless 9-1-1 calls.

The task of answering and dispatching wireless 9-1-1 calls is complicated by a number of factors recently cited by the Nebraska Chapter of the Association of Public Safety Communications Officials (APCO). These include:

- The 9-1-1 telecommunicators must ascertain the classification of the wireless call, verify its confidence level and then process that information into an accurate street address.
- In wire line calls, the caller's actual street address appears on the telecommunicator's screen display. They do not have to translate coordinates into the closest likely street address. Whereas in wireless calls, the caller might be moving past the location from which their call originated, the location shown might be 50 to 300 meters (or more) from where the caller is, and if the caller can talk, they might not be aware of their location or its closest cross street.
- The telecommunicator must be trained to use multiple techniques and technologies to ascertain an accurate location.

In addition, we have found that the telecommunicator may also be required to overcome "voice-blanking" a temporary interruption of audio signal between call and telecommunicator which can occur as the phone is attempting to send GIS coordinates.

A Service without Personnel is no Service

Over the years, the PSC has invested considerable funds to build the infrastructure in Nebraska so that PSAPs could receive and dispatch properly wireless 9-1-1 calls. However, no wireless 9-1-1 system can exist without adequately trained personnel who deliver such service, and a responsible 9-1-1 support allocation model will not ignore this fact.

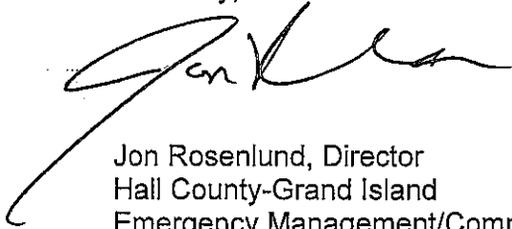
Realizing that PSAP personnel and training costs are eligible and appropriate costs for the support allocation model simply acknowledges that fact that a system of equipment and software is useless without the individuals who operate and maintain it.

Interfacing Equipment with 9-1-1

As noted by Nebraska APCO, the process of properly answering, locating, and dispatching wireless 9-1-1 calls requires the interfacing of various systems and technologies used in the PSAP, including GIS, CAD and CAD mapping, and recording/call-back devices designed to ensure that dispatchers can review information on calls. These are not separate systems intended to exist alone. Each is integrated into the larger whole of cooperative elements which provide the telecommunicator with an accurate location, data, recordings, and response information that is critical in a timely and adequate emergency response.

We applaud the considerable work, time, effort and attention that the PSC has paid toward the establishment of wireless 9-1-1 in Nebraska. Today, we ask that the PSC would continue on toward the next step of maintaining this significant investment by extending the Wireless 9-1-1 SAM to the personnel, training, systems, and other tools found in the PSAP which support our life-saving mission.

Sincerely,



Jon Rosenlund, Director
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