

September 3, 2009

Re: PSC Application No. 911-019/PI-118

Public Service Commission:

In response to the above mentioned Open Docket the Lincoln Emergency Communications Center files the following comments and suggestions for adoption by the Commission.

Item I. Description of the 911-SAM Wireless 911 Support Allocation Model

The order states that the 911-SAM derives costs proxy amounts in four cost categories; PSAP, GIS, LEC and WSP. In addition to this statement, Appendix A and B of the Order both show amounts for each of these cost centers. The Lincoln Emergency Communications Center supports the mechanism for reaching the 12.39% funding and the use of these proxies for determination of fund dissemination however we do not support the Public Service Commission designating a certain amount of funding per cost center for us. We believe that the money being allocated to the PSAP should be a lump sum amount which can be spent on a variety of eligible items with no designation or limitation on the amount spent on any of the three cost centers. This would allow for agencies to be much more aggressive on contracts with their Local Exchange Carriers as well as GIS contracts if GIS is not maintained internally. Additionally, rules should be written to address consolidation or regionalization of PSAP service and the impact of this on the 911-SAM.

See item II.B below regarding eligible costs.

We strongly support the requirement to report annually with appropriate documentation. We support certification of eligibility and would urge the Commission to address the possible disbursement additional funds to eligible PSAPs that may become available if non-performing PSAPs do not receive their 911-SAM Allocation.

Item II. A. Prerequisites for PSAP Funding

The Lincoln Emergency Communications concurs with the eligibility requirements listed in the Order and would suggest the possibility of some type of performance measures also being a consideration.

Item II. B. Eligible PSAP Costs

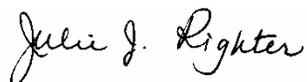
Possible eligible costs listed in the Order are specific to telephony/telecommunication service and equipment however we are adamant that personnel and training costs must be considered as eligible costs as they are integral to the successful processing of wireless 911 calls. There are some areas of the state with larger population bases, Lincoln included, where it has been necessary to increase staff directly related to the increased call volume from cellular calls. Training of staff to handle all 911 calls is a priority for public safety communications professionals.

The Lincoln Emergency Communications Center believes that 911 hardware/software equipment, in the form of servers and other customer premise equipment (CPE) should continue to be funded out of the reserve proposed in the Order. These purchases are often one time purchases, occurring every 5 to 6 years and could easily be planned for with little impact on the reserve. If this is not the case then a mechanism must be put into place where a PSAP could "carry over" funds from their 911-SAM in anticipation of equipment replacement needs. An example of this would be of the proposed first year allocation for Lincoln Emergency Communications Center we would propose banking \$100,000 the first year and each of the following years for replacement systems. If agencies are to be required to pay for all new equipment out of their 911-SAM funding then all should be on a level playing field at the beginning. The Lincoln Emergency Communications Center has a pending proposal at the PSC for a new system, if this is not funded prior to adoption of these rules we will be required to spend over half of our first SAM allotment on CPE.

The Lincoln Emergency Communications Center supports an annual payout of support funds on January 1<sup>st</sup> of each calendar year.

We would like to thank the Commission staff for the hard work they put into development of the proposed 911-SAM. Please contact us if you have any questions regarding our comments.

Sincerely,



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