

# GeoComm

**Date: November 30, 2011**

**Subject: GeoComm comments regarding Enhanced Wireless Services Act  
Neb. Rev. Stat. § 86-442 et seq.**

GeoComm encourages the State of Nebraska to require testing standards and procedures that are in accordance with the following recognized public safety industry wireless testing best practices and standards:

- APCO Effective Practices - APCO ANS I.103.1-2008: Wireless 9-1-1 Deployment and Management Effective Practices Guide
- FCC Bulletin - OET-71
- APCO Performance Testing Guidelines Evaluating Wireless E9-1-1 System Performance at the PSAP
- PSAP-Service Capability Criteria Rating Scale - APCO/NENA ANS I.102.2-2010

The testing standards and procedures are currently written for the implementation of enhanced wireless 9-1-1 service on wireless towers. GeoComm recommends that wireless maintenance also be included in the rules.

Wireless maintenance includes the addition of new towers, sectors to existing tower sites, and changes to existing sector coverage. Wireless maintenance changes are communicated to the PSAP through the submission of routing sheets that request verification and approval of the tower site information. However, planning for wireless maintenance testing is typically not done in advance and is not coordinated with the Public Safety Answering Point (PSAP) administration. The PSAP usually does not receive a test plan to review. Using the test plan, the PSAP would determine if the data from the routing sheet was correctly incorporated. PSAP administration is also typically not asked to oversee the testing and determine if there are any issues or problems.

Wireless maintenance testing should be under the same rules as wireless implementation testing in order for the PSAP administration to verify the testing. The test schedule should be coordinated with the PSAP administration and a test plan should be submitted in advance. The PSAP administration should have the opportunity to provide input on the test plan and be involved in the maintenance testing to identify any issues or problems that may cause a delay making a tower site active.

