



Communications Department

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Mark S. Conrey
Chief of Communications

August 27, 2014

Nebraska Public Service Commission
300 The Atrium
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Lincoln, NE 68508

RE: PSC Application No 911-060/PI-191

Public Service Commission:

In response to Progression order #1 seeking comment and establishing schedule to Application No. 911-060/PI-191 entered July 29 2014 Douglas County offers the following comments to your questions.

1. The amount of funding to be made available from the Enhanced Wireless 911 Fund? It would make sense to fund the service requested by the PSAP. I would recommend a contract not to exceed three years be allowed. The cost of the contract can be projected and paid out of the fund. This would allow the state to possibly come up with a direction of where they are going in implementing an ESI Net for next generation 911 with an eye to folding these services into the net.
2. Eligible payees. What costs associated with text to 911 should be eligible for funding? How should funding be distributed? The contract should specify all costs to the PSAP and then be reviewed by PSC. That cost and only that cost should be funded. The three choices for Text to 911 should be within the current capability of the PSAP. Once a signed copy of the contract is received at the
3. Data collection. What data should the Commission require for those receiving interim funding? It is difficult to determine what data is going to be available. If the PSAP doesn't have an MIS package it might be impossible. I would suggest the PSC request data collection if available from the text control center. Location information will not be initially available. For the most part it really doesn't matter because currently phase II information is inconsistent at best and if we can't reliably get that data after all these years, what makes anyone think we can get this information for text to 911.
4. How should those receiving interim funding account for the expenditure of funds? Once a signed contract is in place the payment invoice should suffice.

5. How should the public be engaged and educated and whose responsibility should it be to educate? It should be a joint venture between the local PSAP, the wireless carriers and State.
6. Whose responsibility is training for the PSAPs to use text to 911 technologies? The PSAP has primary responsibility and any training material should be provided by the LEC, the Text Control Center and/or the CPE vendors.
7. Text to 911 solution technologies. How should the commission determine which technology option should be funded for the different PSAP's? Obviously the PSAP needs to determine what they want and justify the request to the PSC. The Commission, in conjunction with the wireless advisory board should compare the request to the volume of wireless calls received on an hourly, daily and monthly basis and the number 911 trunks in the PSAP. If a PSAP has 12 calls an hour and only two trunks then tying up single trunk for a TTY call would be detrimental to the PSAP. The other consideration would be if a college or university is present in the jurisdiction and the number of public safety response to the locality around the college would be indicative of the possible impact for text to 911 services. This type of information would be something that would help the PSAP justify their proposed solution. There can be no absolute formula but historical data based on volume will be the most logical indicator of the type of solution that would be appropriate.

Sincerely

A handwritten signature in blue ink that reads "Mark S. Conrey". The signature is fluid and cursive, with the first name "Mark" and last name "Conrey" clearly legible.

Mark S. Conrey
Douglas County