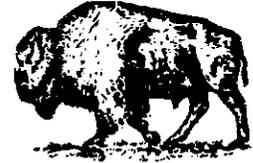


Neil A. Miller
Sheriff



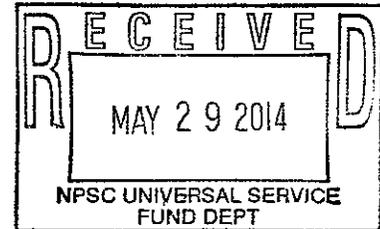
BUFFALO COUNTY OFFICE OF THE SHERIFF

2025 Ave. A • P.O. Box 2228
Kearney, Nebraska 68848
Phone (308) 236-8555



May 29, 2014

Nebraska Public Service Commission,



This letter is in response to Application No. 911-060/PI-191 regarding filing comment to the Nebraska Public Service Commission who is seeking to investigate and determine whether additional funds from the Enhanced Wireless 911 Fund should be made available to public safety answering points for costs to implement text to 911 solutions.

The question that was presented to our PSAP is whether additional funds beyond the annual allocation should be made available for the implementation and provision of text to 911 services.

It is our view that text to 911 is a new service that is emerging and being implemented in PSAPs. This service is not in our current budgeting and that cost is still somewhat of an unknown. We agree the text to 911 is solely a wireless 911 service and should not follow the wireless/wireline ratio. The text to 911 is an important service that needs to be implemented in PSAPs as soon as possible. This service is invaluable to the hearing impaired and deaf community. It has also been important for the younger generations in suicide prevention and the communities with colleges or universities. Another benefit is for citizens to report emergencies when talking or making noise would present a danger to them, such as a burglary or domestic violence situations. To be able to implement the text to 911 services as soon as possible it would be beneficial that funds be made available for the cost of implementation and provisions of this service.

We believe however that there should still be some oversight or conditions on what type of service that PSAPs are implementing based on their volume of text to 911 incidents. It is not economical for a PSAP that may only handle a few texts to 911 incidents yearly to have the most costly solution funded. Also it is not feasible to have funds provided to upgrade a complete CPE or CAD system just to have an integrated solution provided to that PSAP.

At this time there are three ways to implement text to 911. The first is integrated with CPE and/or CAD. This would be the best solution for PSAPs that would have a higher number of texts to 911 incidents, but also the most costly to implement therefore not the best solution for a PSAP that may only answer a few text messages a year. The cost associated with Integrated can depend on what it is going to take as far as equipment and software to make this integration possible. This solution is very reliable and does not affect 911 voice trunk capacities. It also would be the best solution for busy PSAPs since their workflow would be integrated with their current phone system.

The second solution is a web browser service. This may be a good solution for a transitional approach for PSAPs looking to upgrade their phone or CAD system in the future, but not ready to implement an

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integrated solution at this time. This would be a more economical solution for smaller PSAPs with lower call volume. It does take an internet connection, but does not impact voice trunk capacity.

The third solution is SMS delivery over TTY. This may be the best solution for very small PSAPs with very low call volume. This may be the most economical solution for these PSAPs. This solution does compete with voice traffic, but would not require any technical change to the PSAP. They have found there are some error handling issues with this solution such as message-based to character-based conversion and message collision along with garbled text.

It is our opinion that these funds should be made available from the Enhanced Wireless 911 Fund to be able to implement a text to 911 solutions in these PSAPs with some conditions and oversight. This should include costs for equipment, software, installation, maintenance and connectivity costs to be able to implement these services as soon as possible from a public safety prospective. These costs should be outside of the existing cost model for wireless 911 funds.

If you should have any additional questions please feel free to contact me.

Sincerely,

A handwritten signature in cursive that reads "Robert A. Tubbs".

Robert A. Tubbs
Lieutenant

A handwritten signature in cursive that reads "Neil A. Miller".

Neil A. Miller
Sheriff