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Nebraska Public Service Commission

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300 The Atrium 1200 N St.

Lincoln, NE 68509

Good Morning Commissioners,

We would like to thank you for the opportunity to comment on Application 911-073/PI 232.

After reviewing the above listed application, we would like to make the following comments by number as listed in the application.

1. We support the new funding ratio that is proposed.
2. Expanded eligible uses of the funding to cover the entire 911-center cost would help to better fund 911 at the local level.
3. With the current language in 86-435 "Funds generated by the service surcharge shall be expended only for the purchase, installation, maintenance, and operation of telecommunications equipment and telecommunications-related services required for the provision of 911 service" there have been many different opinions issued by local government attorneys on what the eligible expenses would be. In addition, audits are currently being done at the local level, either city or county by the State Auditor's Office or a private auditing company hired by the local government. This audit is done locally as the funds are received locally. One way to ensure that funds are being spent for 911 services would be an annual certification by the PSAP or government authority (city, county) that the funds were used for 911 related expenses. This would protect the state from the potential of lost grant funding for improper use of these funds.
4. With the adoption of regional 911 systems across the state, regional funding has become a new item in host versus remote costs that are shared between members of the region. As a host site, we believe that we should fund some of those costs with this funding and have given an example of how to do that in response number 5.
5. When 911 wireless funding first started, a portion of that funding was used to help the carriers to implement location technology for their customers who needed to call 911. As things have progressed, much progress has been made in the area of location of 911 callers. As we move to

Next Gen 911, precise location information will be critical from the carriers. I believe that some level of funding should exist for those carriers that need funding to implement "new" services required for Next Gen 911 service. Since not all of the carriers have requested funding, but could be eligible, a ratio should be established on the amount set aside in the fund for this purpose based upon number of customers in the state for their respective company. This would allow funding to be available for all carriers, but would keep one or two carriers from getting all of the allocated funds. Any funds remaining could be used to fund the 911 regions of the state for infrastructure costs and or fund the reserve fund.

6. With the ongoing implementation of Next Gen 911, we believe that we will see an increase in the cost of providing this service to the citizens of Nebraska. Our current rates that are set out in statute were for the implementation and support of wireless 911. As we move into adoption and implementation of Next Gen 911, we believe we need to keep a close eye on what the total costs of this service are going to be. If this is not monitored more of the costs associated with 911 will be borne by the general fund. This will cause an increase in property taxes to provide this service. If we see that the cost of this new service is going to outpace the current revenue income, we need to be prepared to introduce legislation that will expand the current cap on the fee to one that will adequately fund the new 911 model for the state.
7. We believe that the Commission should have a reserve fund for unexpected expenses. We are not sure of what the amount of that fund should be, however some level of reserve should be maintained.

With all of the changes coming to this state because of the adoption and implementation of Next Gen 911, funding will be a critical component of providing a robust and stable 911 system to the citizens of Nebraska. We are well on the road to starting that journey, with that in mind a strong partnership between the 911 Department and the PSAP's of this state will be critical for success. We would like to thank you for the opportunity to give comment on this very important component of Next Generation 911.

Sincerely,



William McMullen
Chair, Buffalo County Board of Commissioners



Timothy Higgins
Buffalo County Commissioner
Nebraska Wireless 911 Advisory Board Member