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Nebraska Public Service Commission  
P.O. Box 94927  
300 The Atrium 1200 N St.  
Lincoln, NE 68509

Good Morning Commissioners,

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

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

1. I am supportive of the new ratio that is proposed. The larger PSAP's in the state have been underfunded under the current SAM. Having said that I do realize that this will cause a reduction in revenue to the smaller PSAP's in the state.
2. Expanded eligible uses of the funding to cover the entire potential costs associated with running the 911-center would be very appropriate. Under the Federal 911 grant system radio consoles and infrastructure were included as eligible expenses. The use of this funding to pay personnel can help all PSAP's to be able to use this money in the best manner or need of the PSAP. I believe those costs allowed under the Federal guidelines for grant funding should be eligible in the Next Gen state funding.
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 cost in host versus remote costs that are shared between members of the region. I 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 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 of 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, I 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 the statute were for the implementation and support of wireless 911. As we move into adoption and implementation of Next Gen 911, I believe we need to keep a close eye on what the total costs of this service are going to be. Under our plan, we will have an opportunity to implement the regions over a period of time. If we see that the cost 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. I do believe that the Commission should have a reserve fund for unexpected expenses. I think that a fund balance equal to 6 months of wireless income would be appropriate. It may not be practical to start out with that much, however the fund could grow over time to that amount with monthly allocations to that reserve fund.

With all of the changes coming to us from 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. I would like thank you for the opportunity to give comment on this very important component of Next Generation 911.

Sincerely,



Neil A. Miller  
Buffalo County Sheriff