



GRAND ISLAND - HALL COUNTY

EMERGENCY MANAGEMENT • COMMUNICATIONS

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May 21, 2020

Public Service Commission
1200 N St. Suite 300
Lincoln, NE 68508

RE: Public Comment on E911 Funding Recommendation

On May 5, 2020, the Public Service Commission opened a proceeding to consider the implementation recommendations of a new 911 Service System funding model for Next Generation 911. Specifically, the Public Service Commission sought for comment regarding details of the recommendation that was approved by the 911 Service System Advisory Committee on April 1, 2020. In its May 5 proceeding, the Public Service Commission asked the following questions. Our recommendations are found below each question.

1. Is it appropriate for the Commission to base the allocation of wireless surcharge funding to PSAPs on a base amount, call volume and population? If so, should the relative percentages be 40 percent, 40 percent and 20 percent, or some other proportion?

Response: We concur with the Advisory Committee recommendation of a 40/40/20 allocation ratio on the basis that the model provides a reliable base of minimum funding for each PSAP in the State of Nebraska which is neither excessive in amount nor unwarranted on the basis that every PSAP will have certain inescapable costs. Maintaining a 40% base amount for each PSAP will help ensure the State's commitment to provide 911 service to every Nebraskan, regardless of their location or residency.

We also believe that the 40% allotment based on call volume is an effective measurement of the variable costs to a PSAP and provides larger and more active PSAPs the ability to pay for the services, hardware and software necessary to meet the increased need that a larger call volume would require.

We also agree with the 20% allotment by basis of population. While 911 technology and use is more mobile than ever before, rendering strict jurisdictional populations less relevant than call volume, the fund must not ignore the fact that population has an impact on a jurisdiction's commitment and expenses for delivering 911 service.

2. Should the Commission expand the eligible uses of PSAP funding allocations, for example, to include radio equipment or broader coverage of local personnel costs?

We recommend that any expansion of the eligible uses of PSAP funding be limited to those which are directly relevant to the 911 operations and personnel costs necessary to receive, record, manage, and transmit to responsible units relevant information of a 911 call, including but not limited to, personnel benefits for 911 call takers/dispatchers, operating costs for 911 telephone and radio equipment, and maintenance costs for that equipment and software.

We believe that the responsibility to receive emergency notifications and information, to respond to the scene, and coordinate the operations of the incident from the scene are the responsibility of other public safety departments and therefore not eligible for 911 funds.

3. Should the Commission's audit procedures with respect to PSAP use of 911 surcharge funds also cover expenditures of wireline and VOIP remittances?

No, the wireline and VOIP remittances are by law dedicated as a local responsibility. The local wireless and VOIP surcharges are by statute set, received, allocated and accounted by the local entities. Furthermore, each local jurisdiction which manages a PSAP is audited annually to ensure that 911 expenses are made appropriately. The Commission may request copies of the annual audit report for the sponsoring jurisdiction of each PSAP in order to demonstrate that wireline and VOIP 911 funds are used for only 911 purposes.

4. Should any portion of wireless surcharge funds be allocated directly to PSAP regions, in addition to individual PSAPs?

No, allocations should follow the PSAP model. As time goes on, PSAPs and jurisdictions may need to alter or modify their individual and/or regional affiliations. The allocation of funding to the PSAP regions would hinder the ability for PSAPs and jurisdictions to make the most effective operational and financial decisions for their individual situations, thereby hampering the natural movement of PSAPs through regionalization, consolidation, or separation from current regions or consolidated relationships.

5. Is it appropriate for the Commission to continue to allocate a portion of wireless surcharge remittances to wireless service providers? Should it make a difference if the wireless service provider is already imposing a regulatory charge or similar fee on its customers? If a continued allocation to wireless service providers is appropriate, what should be the eligible uses of such funds? Finally, how should wireless service providers' use of such funding allocations be audited?

In an effort to ensure the ability for every Nebraskan to successfully access the 911 Service throughout the state, regardless of where they may live or travel, it is wise to maintain the ability to provide allocations to Wireless Service Providers when certain projects, upgrades or expansion is in the interest of the citizens of Nebraska. Therefore, we recommend that allocations to Wireless Service Providers be made on a project-based application that demonstrates the costs of a projects, its ability to meet gaps in 911 service throughout the State, and report to the State when such project is completed.

6. Is there a minimum level of funding that should be annually allocated by the Commission to PSAPs and wireless service providers, even if such a requirement may require periodic increases in the wireless 911 surcharge?

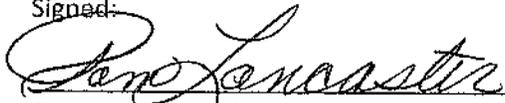
Yes, we recommend that a minimum amount be established using the current allocations as a framework. Following the transition to NextGen911, when all PSAPs are operating in the new model, we propose that the 911 Service System Advisory Committee re-evaluate the financial status of the 911 Fund, the needs of PSAPs and the State and modify as needed. Additionally, the current financial model does not adequately account for inflation and so each subsequent year the Fund's ability to meet future costs will wane until inflationary pressures force an increase just to meet the most basic expenses.

7. Is it appropriate for the Commission to retain some amount of wireless surcharge remittances as a reserve fund? If so, what is the appropriate reserve fund balance?

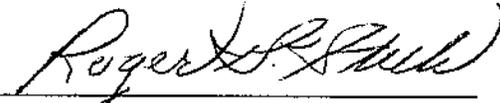
Yes, it is wise to maintain an adequate reserve fund balance, just as it is for all governmental jurisdictions. We recommend that the Commission maintain at minimum a 3 month reserve to maintain necessary 911 service system support.

We want to thank the Commission for their invitation to provide comment on this matter. For further details, please contact our Grand Island-Hall County Director of Emergency Management and Communications Director, Jon Rosenlund, at the information provided below.

Signed:



Pam Lancaster, Chair
Hall County Board of Commissioners



Robert G. Steele, Mayor
City of Grand Island

Jon Rosenlund, Director
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