

FROM: Kathy Allen, Douglas County 911 Director

SUBJECT: Public Comment for Application 911-073/PI232

TO: Nebraska Public Service Commission

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Thank you for the opportunity to respond. After reviewing the above listed application, I would like to make the following comments by their corresponding number on Page 3.

1. How the wireless surcharge money should be allocated to PSAPs. I am supporting the new ratio, as the larger PSAPs in the state have been underfunded for years. With that being said, I am of the opinion that future funding levels for Douglas County 911 should be increased as the 911 Operating Budget increases, especially with the loss of wireline revenue funds.
2. Should the Commission expand the eligible uses of PSAP funding to include broadening eligibility of personnel costs and radio costs? It is my opinion that YES, personnel costs have increased as the number of wireless calls have increased. It takes longer to process calls while attempting to get accurate locations on wireless calls. Our personnel costs are a large majority of delivering 911 calls from start to finish.
The call, once answered must be processed in accordance with local guidance, necessary and appropriate help must be correctly determined and emergency response must be directed until they arrive at the citizen. Douglas County adamantly supports that funding be authorized for ALL the necessary components of the entire 911 System.
3. Should the Commissions audit procedures cover wireline & VOIP remittances? Absolutely not. The audit of these funds are being done at the local level and should stay that way, as the funds are received at the local level. NE Code 86-435 - 911 Wireless surcharge allows funds to be spent on installation, maintenance and operation of 911 service. Implementing and directing 911 service is a local government requirement and therefore should be audited as such.
4. Should any portion of wireless surcharge funds be allocated to PSAP Regions in addition to individual PSAPs? I am of the opinion they should not. Since each individual PSAP within the Region is getting funded, and the whole concept of Regionalization is to save costs, why would we increase the allocations as a whole?
5. Should the Commission continue to allocate a portion of wireless surcharge remittance to wireless service providers? I believe that the FCC 15-9 and FCC19.20 mandate the wireless carriers to make progress towards accurate location information (to include urban, rural areas, indoor-outdoor accuracy). Why would we fund a service that the FCC has mandated in the

interest of public safety? Who has the authority to monitor the wireless carriers' progress regarding location accuracy? If these funds would improve state-wide location accuracy overall, then that would be acceptable.

6. Is there a minimum level of funding? I am certain that with the implementation of NG911 there will be increased costs of providing this service to citizens in Nebraska (at both the local and State level). As we monitor the costs versus the revenues, Douglas County would support increases in the wireless 911 surcharge if needed.
7. Is it appropriate for the Commission to retain a reserve fund? I would support the Commission having a reserve fund for emergency expenses.