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Nebraska Public Service Commission  
1200 N Street, The Atrium  
Lincoln, NE 68509

RE: Comments regarding Application No. 911-073/PI-232 seeking public comment on the 911 Service System Advisory Recommendations for funding reimbursement

Commissioners,

Thank you for the opportunity to provide input into the recommendations for 911 funding in Nebraska. I look forward to the positive and exciting changes in 911 service in Nebraska with the coming of Next Generation 911 services.

Certainly, changes to the current funding model must be adopted to meet the needs of the provision of 911 in Nebraska with the implementation of Next Generation 911 (Next Gen). Next Gen will create new levels of requirements and needs for Public Safety Answering Points (PSAP's) as we move into text to 911, video to 911, and other labor and equipment intensive enhancements. All PSAP's will be faced with increased labor and equipment costs as the state moves forward. Hopefully the funding model will be crafted to help local jurisdictions meet those needs.

I will address the recommendations numerically as listed in the Order.

1. Labor and equipment costs will be increased for all PSAP's with the implementation of Next Gen. However, smaller rural PSAP's will be disproportionately affected due to their limited tax and resource bases. For example, PSAP's in more rural areas will be required to purchase, maintain, and upgrade similar equipment as PSAP's serving larger areas. For that reason, I would encourage a funding model that allows for a base amount of 50% with a 30% amount based on call volume, and 20% amount based on population.
2. I encourage support for the expansion of funds that may be allocated to personnel costs, as those costs are directly increased as a result of the implementation of Next Gen services. I also support the limited use of allocated funds for the provision of radio console purchase and maintenance within the cost model. While console radios are the primary means PSAP's utilize to provide 911 information to first responders, I do believe acquisition and expense of radio equipment used by responders is solely the responsibility of those responders as it is not directly related to the expense of call taking and dispatch services.
3. Wireline and VOIP expenses paid directly to PSAP's jurisdictions are audited by the political entities responsible for the operation and funding of PSAP's. For that reason, it would be an unnecessary duplication of efforts and expense for the funds to be audited by the Public Service Commission.
4. As most regions are established with a process in place to share the costs of provision of 911 services, it would seem unnecessary to allocate surcharge funds directly to regions.

5. As a PSAP administrator I am unfamiliar with which costs incurred by wireless service providers are directly related to the provision of 911 services. I do encourage the use of any and all funds allocated to wireless and wireline telephone service providers be limited to the costs directly related to the provision of 911 services. I discourage the allocation of funds for the expansion of service areas through construction of equipment towers unless provision of 911 ongoing equipment and services provided by the tower are at no cost to the Public Service Commission, PSAP's, or the public. I also strongly encourage that any and all funds allocated to wireless service providers be audited by the Public Service Commission to verify appropriate use of funds.
6. While I have no opinion regarding costs to wireless service providers, I encourage an expansion of funding to PSAP's through periodic increases in the wireless 911 surcharge funds to offset increasing expenses related to the provision of services. As primary funding sources (property tax) are more limited by the Legislature and expenses increase, the funding allocation becomes even more critical to the provision of 911 services.
7. I encourage the retention of a portion of wireless surcharge remittances be retained in a reserve fund at a level deemed appropriate by the Commission and as recommended by fund auditors. It would be irresponsible not to have reserve funding in the event of emergencies and/or events brought about by unseen circumstances.

Respectfully submitted,



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