



York County Communications Center
Leila Luft, Communications Director
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June 1, 2020

State 911 Department
1200 N Street, Suite 300
Lincoln, NE 68508

RE: Application No. 911-073/PI-232 Order Opening Doctet and Seeking Public Comment

Dear Nebraska Public Service Commission Commissioners,

In response to your request seeking public comment on the 911 Service System Advisory Committee Funding Working Group proposal, I would like to provide the following commentary in italics:

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?
Yes, the allocation of wireless surcharge funding should be constructed on a base amount, call volume and service area population in the 40-40-20 percent ratio. The allocation ratio proposed by the Funding Working Group gives a holistic approach to a PSAP's framework and gives fairness to all PSAPs to be Next Generation 9-1-1 ready.
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?
Yes, the eligible uses of PSAP funding allocations should be expanded to include radio equipment and other PSAP related costs. Radio equipment is very much an important piece in 9-1-1 call processing and should have been included in this allocation model from the start. Presently, the pandemic has required PSAPs to look at various redundancies with their neighboring PSAPs and radio communications is a significant piece in those redundancy efforts.
3. Should the Commission's audit procedures with respect to PSAP use of 911 surcharge funds also cover expenditures of wireline and VoIP remittances?
If you want to provide consistency, yes. My question would be, has there ever been need to audit wireline and VoIP surcharges?

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

That is a viable option worth considering. There are various regionalization costs split between PSAPS that could be mitigated with regional funding. This could also start a "cushion" for region system upgrades and redundancies for call handling equipment replacement.

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.

I would want to first understand why we are funding wireless service providers and what they are using the funds for? My assumption would be that WSPs used this 911 funding to build cell tower coverage in poor service areas further collaborate with the Enhanced 9-1-1 era. Wireless Service Providers should provide justification to the Public Service Commission as to what they are using the funds for. If we are able to cut funds from WSPs to use for our Next Generation 9-1-1 implementation, then we must. WSPs won't suffer a huge loss, they are still able to receive funds from wireless service customers.

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?

Taking an average of the 911 funding allocations over the past five years (2016-2020), the minimum level of annual funding should be at \$4,850,000 for PSAPs. If this requirement necessitates an increase in wireless 9-1-1 surcharge over a period of time to get us through Next Generation 9-1-1 implementation, it will be worth it.

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

That is a viable option worth considering. If Next Generation core services require additional maintenance and upgrading 10 years from now, I would say yes, we need to start a reserve fund.

Sincerely,

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