

Mr. Mike Hybl
Executive Director
Nebraska Public Service Commission
1200 N Street, 300 The Atrium
Lincoln, NE 68509-4927

September 4, 2009

RE: The support of the Enhanced Wireless 911 Advisory Board for the proposed Cost Model as a permanent funding mechanism for wireless 911 in the State of Nebraska with some noted recommendations or exceptions.

Dear Mr. Hybl,

The Enhanced Wireless 911 Advisory Board (Board) dedicated considerable effort, study, thoughtfulness, and diligence in considering the implementation of the proposed Cost Model as a permanent funding mechanism for wireless 911 services in Nebraska. The matter was discussed during the July 2009 Board Meeting. The matter was further studied and discussed at a special meeting of the Board for that purpose on August 13, 2009. After a great deal of deliberation, the unanimous determination of the Board was to support the proposed Cost Model as a permanent funding mechanism for wireless 911 services with the following recommendations or exceptions:

The Board recommends that the Public Service Commission (PSC) provide educational training for all parties involved in the implementation of the proposed Cost Model, especially the directors of Public Safety Answering Points (PSAP's) and elected officials, to allow those entities to understand the proposed Cost Model and funding method and effectively budget and manage state funds as provided by the Cost Model;

The Board recommends the funding be provided to all parties on the basis of the fiscal year as opposed to the calendar year to allow political subdivisions to more effectively plan and budget for receiving and disbursing wireless funds in the provision of wireless 911 services;

The Board recommends that disbursements of funds from the PSC to PSAP's be provided in advance on a quarterly basis to allow PSAP's to utilize funds to remain current in funding obligations to telephone companies and other parties involved in providing wireless 911 services;

The Board recommends the PSC specify eligible costs for wireless 911 services pursuant to the Enhanced Wireless 911 Services Act (Act), to include 911 personnel training. It was felt that providing political subdivisions and PSAP's with specific information of eligible costs would greatly assist those entities in the proper utilization of funds;

The Board recommends that all PSAP's be mandated to meet the standards for provision of wireless 911 services established by the PSC to be eligible for funding. It was discussed that the additional responsibilities and latitude placed upon PSAP's and political subdivisions by the proposed Cost Model as a permanent funding mechanism could potentially result in less than adequate wireless 911 services and a deterioration of GIS mapping data in the Repository due to the loss of direct control and oversight of some functions of the services by the PSC;

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The Board recommends that the PSC continue to pay costs directly to wireless service providers to ensure more effective provision of wireless 911 services;

The Board recommends that the PSC establish minimum standards for equipment utilized in the provision of wireless 911 services. PSAP's and political entities often do not possess the knowledge and technical ability to ensure that equipment required for wireless 911 services meets necessary standards to assure public safety. Heretofore, the Board and PSC staff has provided oversight and approval of expenditures for equipment for PSAP's in advance of purchase. The implementation of the proposed Cost Model as a permanent funding mechanism for wireless 911 services will eliminate that opportunity for oversight. Established equipment standards will provide PSAP's and political entities with the necessary guidance in purchasing equipment to ensure adequate provision of wireless 911 services;

The Board recommends that the date of implementation of the proposed Cost Model as a permanent funding mechanism be no sooner than July 1, 2010. The recommended delay in implementation is necessary to allow political subdivisions sufficient time to plan for implementation and incorporate the changes in funding into annual budgets;

The Board recommends that the funding cap for PSAP's be determined by the PSAP's rather than establishing caps for funding in specific cost categories. Allowing PSAP's the flexibility to utilize funding as necessary within approved cost categories will allow them to address needs in a more timely and effective manner;

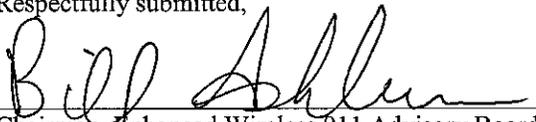
The Board recommends that PSAP's be required to disclose funding from sources other than funding provided through the PSC for the provision of wireless 911 services to allow the PSC to better identify the funding needs of PSAP's throughout Nebraska;

The Board recommends that the E 911 Cost Model be reviewed by the Advisory Board and the Commission on an annual basis. The review of the Model and of funding to individual entities is necessary in the event of consolidation of PSAP's, local exchange carriers, and wireless service providers or other changes that could occur;

The Board recommends that a cap be placed on the wireless carrier grant funding available through the Cost Model as the majority of wireless carriers have and are providing wireless 911 services in accordance with current regulations.

The Board supports the implementation of the proposed Cost Model as a permanent funding mechanism for wireless 911 services in Nebraska with the noted recommendations or exceptions to the Cost Model, which the Board feels are vital to maintain the appropriate level of wireless 911 services to the citizens of Nebraska.

Respectfully submitted,


Chairman, Enhanced Wireless 911 Advisory Board