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January 15, 2010

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

RE: Application No. 911-019/PI-118

Dear Mr. Hybl,

The City/County Law Enforcement Center has carefully reviewed Nebraska Public Service Commission Application No. 911-019/PI-118. We respectfully request favorable consideration of the following recommended adjustments to the cost model's eligible Public Safety Answering Point (PSAP) costs:

2. Eligible PSAP Costs

- **Personnel Training Costs for telecommunicators who answer wireless 911 calls.**

Quick and precise processing of wireless 9-1-1 calls is much more complicated than processing a wireline 9-1-1 call. Processing wireless 9-1-1 calls requires the completion of multiple simultaneous tasks that require specialized training. The 9-1-1 telecommunicators must ascertain the classification of the wireless call, verify its confidence level and then process that information into an accurate street address. In wire line calls, the caller's actual street address appears on the telecommunicator's screen display. They do not have to translate coordinates into the closest likely street address. Whereas in wireless calls, the caller might be moving past the location from which their call originated, the location shown might be 50 to 300 meters (or more) from where the caller is, and if the caller can talk, they might not be aware of their location or its closest cross street. The telecommunicator must be trained to use multiple techniques and technologies to ascertain an accurate location.

- **Personnel Costs associated with answering wireless 911 calls.**

Wireless calls present additional challenges to the 9-1-1 telecommunicators. They take more time to process than a wire line call. In addition to needing the skills to ascertain an accurate location, they must verify the validity of the call, is it an active caller, a prank caller, or an inadvertent caller. Wireless calls can be made without the caller being aware of it. This requires that the telecommunicators initiate a call back sequence to verify if there is an actual emergency. If unable to contact the caller, the telecommunicator often has to subpoena the caller's service carrier to obtain alternative contact information. This is time consuming yet critical to making sure that if there is a real emergency, the caller can be located and helped. When any of the information the telcommunicator is expecting is missing, the telecommunicator faces another set of challenges that involve carrying out another

sequence of events. The telecommunicator must then be able to decipher a location on a map based on bits of sketchy information. A wire line call comes in as a very specific point on a map with a specific street address. Wireless calls have changed the scope of responsibilities and skills required for 9-1-1 telecommunicators to the extent that their job descriptions are being rewritten to recognize the additional specialized skills required to successfully fulfill their responsibilities.

- **Costs associated with interfacing wireless call data with 911 equipment required to process the call.**

The processing of wireless 9-1-1 calls requires the use of multiple interfaced technologies and equipment to extract the location information. In some cases, they must interface with CAD or a recording device that records not only the voice, but also the data. 9-1-1 telecommunicators must routinely review that data when a call goes dead or is disconnected. The call information must also be interfaced with mobile data devices in order to quickly dispatch the closest first responders to the area from which the call is emanating. All of the different equipment and associated technological components in a 9-1-1 call center are critical to processing 9-1-1 calls. Wireless 9-1-1 call interfaces to these equipment components are necessary for providing a complete picture that enables the best chance of a quick and accurate emergency response.

We sincerely appreciate the efforts of the Commission in developing the cost model. It is our sincere hope that you will continue to show your support of our challenging profession by ruling in favor of these life-saving recommendations.

We are grateful for this opportunity to present these recommendations for your consideration.

Thank you.

Sincerely,

Patrick Foust, Director
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