

August 26, 2009

Nebraska Public Service Commission
Re: Application No. 911-019/PI-118

Dear Commission Members,

I am submitting comments in response to Application No. 911-019/PI-118 and the proposed permanent funding mechanism for Wireless 911 in Nebraska. I would like to begin by addressing the implementation date of January 2010. Municipal and county budgets do not run the calendar year so beginning remittance on this date will cause difficulties for everyone. At best, the payments should begin later in 2010 and in accordance with the city/county budget cycles. This will also allow more time for the discussions and hearings that are yet to be held to finalize the permanent funding issues.

In section A-PSAP funding, this section requests comment on the frequency of payments to the PSAPs. Monthly payments would make it easier to fit the payment cycle in to the budget/fiscal year. Monthly payments also would ensure a steady cash flow to the account for paying bills. This same section of the order asks for comment on allocations for future purchases. There should definitely be a requirement that a portion of each PSAPs funding be set aside for future purchases. 911 services rely heavily on technology, which changes at a very rapid pace. Equipment has finite life spans and the PSAP must be prepared to keep up with these changes. In addition, Next-gen 911 is rapidly approaching, which will require even greater technological upgrades. However, each PSAP will need to decide how much per year should be held in reserve for their upgrade and replacement costs based on their equipment and operations. PSAPs are capable of budgeting and saving the required amount until it is needed for upgrade purchases and it should remain in the regular payments. They should also be allowed to add any excess funds from their yearly disbursement to this reserve for future costs to the PSAP.

Prerequisites for PSAP funding should be established. Receiving money from the wireless fund should require a PSAP to receive the allowable landline surcharge. The wireline vs. wireless use of the hardware and software of the PSAP cannot be clearly divided in most cases and the PSAP has a responsibility to seek any and all funding resources to cover the expenses. In order to maintain the integrity of the local PSAP as well as the statewide

system, the equipment and software must be maintained. Requiring maintenance contracts or personnel for hardware/software and GIS is the best means to ensure that occurs.

Training personnel as an eligible cost should be expanded. Wireless calls are increasing at a rapid rate and the need to provide call takers with continuing education on a variety of subjects is a constant need. Many PSAPs lack the funding to provide adequate continuing education in all of the topics that they need, regardless of whether the call is wireline or wireless. The amount allowable for training could be limited to a percentage of the yearly amount the PSAP receives, but some of the reimbursement should be available for additional training of personnel on broader dispatch topics. Also, a pre-approval review would be helpful for PSAPs. They should be able to discuss a planned project or purchase to determine if the costs are eligible before they spend the money.

Prerequisites should apply to the wireless carriers before they are eligible for funding. They should be required to provide specific cost information and identify other funding available to them in order to ensure the best use of the wireless fund resources. Demonstration of their compliance with accuracy and testing standards should be required. Failure to meet these standards compromises the 911 system and should not be tolerated. It's imperative that there is some oversight of the wireless funds that are distributed to the wireless carriers and these basic reporting requirements will allow a means to monitor their expenses.

Thank you for the opportunity to comment on the proposed funding mechanism.

Sincerely

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