

Scotts Bluff County
Communications Center
1825 10th street
Gering, Nebraska 69341

Mr. Mike Hybl
2010
Executive Director
Nebraska Public Service Commission
1200 N Street, 300 The Atrium
Lincoln, NE 68509- 4927

January 19,

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

Dear Mr. Hybl,

Our Communications Center is responsible for fifty two (52) agencies in the Panhandle of Nebraska. I have reviewed the Nebraska Public Service Commission Application No. 911-019/PI-118. I am respectfully requesting favorable consideration of the following recommended adjustments to the cost model's eligible Public Safety Answering Point (PSAP) costs:

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

The quick and precise processing of **wireless 9-1-1 calls** is very complicated, more so than processing wire line 9-1-1 calls. Processing **wireless 9-1-1 calls** requires the completion of multiple simultaneous tasks that require specialized training. At the onset of the 911 call we must establish 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 dispatcher's screen. Dispatchers' do not have to translate coordinates into the closest likely street address. However in **wireless calls**, the caller might be moving past the location from which their call originated, the location shown might be 100 to 1000 feet (or more) from where the caller is, and if the reporting party can talk, they might not be aware of their location or its closest cross street. The dispatcher 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 all 9-1-1 dispatchers. Wireless calls take more time to process than a wire line call. In addition to needing the skills to discover an accurate location, we must verify the validity of the call, is it active, a prank, or an inadvertent call? **Wireless calls** can be made without the caller being aware of it. This requires us as dispatchers to initiate a call back sequence to verify if there is an actual emergency. If we cannot contact the caller, we often have 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 we are expecting actually is missing, we face another set of challenges that involve carrying out an additional chain of events. We must be able to work out a location on a map based on bits of rough 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 operators across Nebraska to the extent that our job descriptions are being rewritten to recognize the additional specialized skills required to accurately fulfill our 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. Our dispatchers must routinely review that data when a call goes dead or is disconnected. All of the different equipment and associated technological components in a 9-1-1 call center are critical to processing 9-1-1 calls. The **Wireless 9-1-1 calls** interfacing to these sophisticated equipment components are necessary for providing a complete picture that enables the best opportunity for a quick and accurate emergency response. The local / regional telephone service providers in our area (CenturyLink) are assessing PSAPs additional fees associated with the processing of Phase II **wireless 9-1-1 calls**.

I truly appreciate the efforts of the Commission in developing the cost model. I hope that you will continue to support our complex career by ruling in favor of these life-saving recommendations.

Sincerely,

Ray Richards
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