

BEFORE THE NEBRASKA PUBLIC SERVICE COMMISSION

In the Matter of the Commission, on its)
own motion, seeking to investigate and)
revise wireless tower testing standards and)
procedures pursuant to the Enhanced)
Wireless Services Act, Neb. Rev. Stat. §)
86-442 et seq.)

Application No. 911-055-PI-182



**VERIZON WIRELESS' COMMENTS
ON REVISED TESTING STANDARDS AND PROCEDURES**

Cellco Partnership d/b/a Verizon Wireless, along with its affiliates providing wireless service in Nebraska (together, "Verizon Wireless"), respectfully submits these comments pursuant to the Commission's October 22, 2013 "Order Releasing Proposal for Comment and Setting Hearing" ("Order"). The Commission released a revised proposed enhanced wireless 911 tower testing policy (*see* Order, Attachment A) after reviewing the parties' 2011 comments and accepting additional input at a 2012 technical workshop. Order at 1.

Verizon Wireless appreciates the adoption of several of its suggestions for crafting a revised enhanced wireless 911 tower testing policy that appropriately relies on consensus-based testing guidelines targeted at those network changes most likely to affect 911 call routing. *See* NENA Document 57-002, §§ 3.0-3.2. Modernizing and streamlining the Commission's decade-old testing guidelines in this manner is beneficial for all involved.

Although the proposed revised policy represents an improvement over the version adopted in 2002, the Commission should further refine it. The proposed revised policy represents a fundamental (and unwarranted) shift from the existing policy by requiring the wireless service provider ("WSP") to file the completed test validation worksheet ("TVW") with the Nebraska Telecommunications Infrastructure and Public Safety Department ("NTIPS") within 30 days of the completion of testing. The 2002 policy requires merely that "[a] copy of

the completed test and acceptance plan shall be filed” within that period, but does not impose the burden of filing solely on the WSP, as the proposed revised policy would.

As Verizon Wireless suggested in its 2011 comments, the Commission’s policy should direct that NTIPS be copied on the correspondence notifying the public safety answering point (“PSAP”) of the successful completion of testing, which would allow NTIPS to request a copy of the completed TVW directly from the PSAP if a copy is desired. *See* Exhibit C to Verizon Wireless’ November 30, 2011 Comments. If the Commission instead believes it is necessary to require filing every TVW with NTIPS (rather than having NTIPS request a copy only when it wants one), it should simply direct the PSAP to file a copy. This approach would minimize paperwork and administrative burdens, make the imposition of administrative penalties for inconsequential late filings unnecessary, and ensure that the WSP’s and Commission’s focus remains the proper functionality of the E9-1-1 system.

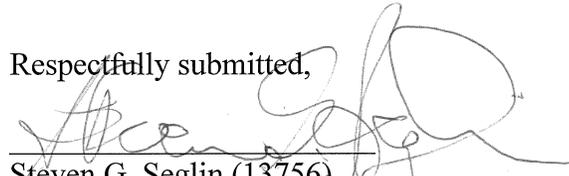
At bare minimum, if the Commission maintains its proposal to place all filing burdens on the WSP alone, and to levy penalties for inadvertent administrative delays in the filing of the TVW, it should (1) increase the time for filing from 30 to 60 days after completion of testing so that WSPs have a greater cushion of time in which to file; and (2) limit complaints for penalties to situations involving egregiously and/or repeatedly late submissions. This would accommodate the necessary internal review of the TVW by a WSP’s various subject matter experts and help ensure that the filed TVWs are complete and error-free. As the goal of the Commission’s proposed revised policy is “to ensure proper routing of all wireless 911 calls” (Order, Appendix A), the focus of its communications with carriers should be on identifying potential 911 call routing problems and resolving any concerns, not on creating a vehicle for the initiation of

formal proceedings seeking fines for the immaterial administrative oversights that occasionally occur when so many parties play an active role in the testing process.

Dated: November 22, 2013

**CELLCO PARTNERSHIP D/B/A VERIZON
WIRELESS**

Respectfully submitted,



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