

continuing degradation of 911 service for California. With the predicted doubling of wireless service within the next four years, California's 911 service will likely reach a point of failure without intervention.

2. Revenues should be adjusted to accommodate present and future 911 requirements, which could approach \$200 million annually.

The current funding status is not adequate to meet current or near future needs. Customer expectations as to satisfactory response times to 911 calls are often not met.

Particularly in urban areas, it is not unusual for 911 callers to wait for more than one minute to be answered at the communications center, especially during peak periods. The average time to answer a cellular 911 call in urban areas is in excess of 30 seconds. This trend in increased answering times is expected to continue as the number of calls increases dramatically in relation to the rapid increase in the number of wireless phones in use by the public. By policy, California has established that, "During the busiest hour of any shift, ten seconds should be targeted as the maximum amount of time incoming 911 calls are to be answered."⁶

The current funding mechanisms of Motor Vehicle Account and local taxes to fund the 911 call answering will remain inadequate to sufficiently staff current and future 911 calls. If an alternative method is not employed, long delays will become the norm throughout much of the state.

⁶ State of California 911 Operations Manual

The benefits of technology (in some instances directed by the federal government) will also require increased funding at the state level. Accurate costs are not yet known, but will likely be significant. Some of the expected new technologies include efficient call handling phone systems for use by communications centers, ANI equipment to automatically determine the phone number of the person needing assistance, and ALI equipment which would determine the caller's location.

As much as \$200 million annually may be required to adequately fund the state's 911 system for the future. Such a limit would serve to sufficiently fund the technical infrastructure and personnel answering costs associated with the 911 system providing an acceptable level of service to the public.

There are some potential beneficiary-based funding sources which, individually or together, could serve as mechanisms to produce sufficient revenue to ensure an acceptable 911 system.

The "911 surcharge" presently in place has a legislated ceiling of .75 percent of the users total intrastate phone bill. Today, the rate is set at .72 percent, which provides an approximate revenue source of \$76 million. Based on these figures, a two-percent rate ceiling is estimated to generate \$211 million.

A change in the rate ceiling would require a legislative proposal. Simply changing the statute, however, would not automatically change the rate paid by consumers. An actual rate change is an administrative procedure accomplished by DGS, with approval by the Board of Equalization.

Another potential beneficiary derived method would include a "flat fee" line access charge, not a charge based on the total bill of the user. Such a mechanism would allocate to all users the same fee based on the number of line services they use.

Most states in the nation employ either one or both of these methods, levied at the state or local level. In only a few cases do states use local or state general funds to finance their 911 systems. Attachment C contains information on the mechanisms employed by other states to fund their systems.

2. Periodic review of program to ensure proper and efficient use of resources.

Continued review of the 911 program fund will:

- assure operational "integrity;"
- maintain an adequate, stable, long-term, beneficiary-based funding source;
- identify efficiencies in existing program;
- evaluate annual payment of \$65+ million to utilities to identify possible reductions in "cost structure;"
- reduce redundancies;
- eliminate/reduce misuse.

D. Technology

1. Technology should allow greater efficiencies in call handling and emergency information.

Advanced technologies will help better manage 911 call handling. Technologies that will increase the ability to process calls, automatically locate and identify callers, as well as other efficiencies, are available now or expected soon. Some of these enhancements are expensive; thus, the 911 program should use pilot programs to study and evaluate their effectiveness prior to statewide implementation.

2. 911 should employ new technologies based on their benefit and economic feasibility, including:

- ANI and ALI, per FCC Order, Docket #94-102.
- Communications center 911 call answering equipment.

3. The wireless industry, the 911 program, the CHP and public safety organizations should develop a method and schedule to implement Phase I by April, 1998. An orchestrated approach is key.

E. Non-initialized phones

1. Develop and implement a statewide standard policy that provides an acceptable level of public safety benefit without imposing inordinate costs on carriers or the 911 fund.

There is considerable controversy and confusion over the provisions in the FCC Order requiring that carriers not impose user validation or similar procedures on 911 access to roamers or other handsets that transmit a "code identification." The order further mandates that carriers must process and transmit 911 calls from

handsets that do not transmit the code identification to any PSAP that has issued formal instructions to do so.⁷

In effect, this allows anyone who obtains any cellular/wireless handset, whether through a legal purchase or other means, to have access to the 911 emergency response system. This can be accomplished without subscribing to a carrier service. It can be argued that this perpetuates fraudulent use and allows users to benefit without contributing to the development and maintenance of the system. It can also undermine the intent of the ANI/ALI requirement by giving access to users who cannot be identified or located, whether in a true emergency or as a system abuser.

2. Evaluate technological problems and potential abuse.

These are significant issues that make it both difficult and costly to comply with the FCC order. It becomes even more problematic to accomplish if requirements vary from one jurisdiction to the next.

3. Public safety benefits through a statewide standard.

The task force strongly recommends that California adopt a statewide policy based on cost/benefit analysis to determine the best interests of the system as a whole. This approach also serves to minimize confusion to the public as the 911 function of a non-initialized phone will be the same throughout the state.

⁷ The cellular industry opposes this and has requested the FCC to reconsider this part of its order.

F. National Non-Emergency Number (311)

1. A group of public and private entities, chaired by an independent body (California Attorney General, for example) should be formed to study the impacts this concept might have on service providers, system resources, and the public.

The task force recommends exploring the technical, economic, and operational feasibility of implementing a 311 non-emergency number program similar to the one being tested in Baltimore, Maryland. This group would be charged with assessing the costs, potential benefits, and impacts on 911 resources and equipment.

2. Although the concept is worthy of consideration, pilot studies should be conducted before endorsing statewide implementation.

California should also conduct a limited local trial to determine whether an alternative non-emergency number reduces misuse of the 911 system without increasing non-emergency calls to the same call-takers.

Conclusions

California citizens place a high priority on the ability to quickly receive emergency response through use of 911. Today, however, the dramatic increase in the use of wireless communications systems by the public has strained the state's 911 capability to the breaking point. The 911 system is the public's "life line" that often can mean the difference between life and death. Without intervention, the shortcomings of California's 911 system will become much worse as the number of wireless users continues to rapidly increase.

Providing adequate 911 support for wireless callers is a nationwide problem. The telecommunications industry has made available communications services for the mobile public where previously no such capability existed. These technologies provide significant enhancements to society's ability to conduct business and personal conversations without the constraints of a fixed telephone line. Public wireless services also provide a "life line" for the mobile public when emergencies occur. Before such services existed, significant delays often occurred by virtue of the necessity to reach a fixed-line telephone.

One of the most common reasons given for purchasing a cellular phone is for the emergency communications capability it provides. In order for public safety agencies to fulfill their role in providing emergency communications services, the 911 system must be improved. The public expects a prompt and reliable response to their 911 calls.

Today, the 911 system experiences significant delays in answering calls, jeopardizing lives, health, and property. Without

intervention, these delays threaten to functionally collapse the system as new phone devices and greater use increases demand on an already overburdened system.

Appropriate intervention is necessary to ensure a responsive 911 system for the future. Addressing the problem may require action in several areas including public education, efficient call direction, funding, technology, initialized phone issues, and the use of alternative non-emergency numbers. The Wireless 911 Task Force has taken an important first step in addressing the needs of California's 911 system. Still, further analysis of specific recommendations to alleviate these problems is necessary and should be an ongoing effort.

Californian's place a high priority on a responsive 911 system. The Wireless 911 Task Force advocates appropriate measures to ensure a viable 911 system to maximize public safety.