

**Before the  
Federal Communications Commission  
Washington, DC 20554**

In the Matter of	)	
	)	
Facilitating the Deployment of	)	PS Docket No. 11-153
Text-to-911 and Other Next Generation	)	
911 Applications	)	
	)	
Framework for Next Generation	)	PS Docket No. 10-255
911 Deployment	)	

**COMMENTS OF THE BLACK HAWK  
CONSOLIDATED (E9-1-1) COMMUNICATIONS CENTER**

February 2, 2012

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## **INTRODUCTION**

The Black Hawk Consolidated Communication Center is a consolidated 911 Center for the entirety of Black Hawk County. We receive all 911 calls from all citizens in Black Hawk County and dispatch for all public safety agencies, including law enforcement, fire and EMS. We also provide dispatching services for a private ambulance agency.

## **BACKGROUND**

Black Hawk County has always been forward thinking in our approach to technology and providing the best service to our citizens. In 1995 the governmental agencies within Black Hawk County entered in to a corroborative agreement and closed the four PSAPS in Black Hawk County, combining them into one; thereby sharing resources, costs and ultimately achieved interoperability among all public safety entities, regardless of discipline, in our County. We were the first in our State to achieve this.

Our Center is an eight position center. We employ 22 full time dispatchers, 5 part-time dispatchers, 1 shift supervisor, 1 administrative assistant and 1 director. We receive and process over 130 911 calls, approximately 1500 non-emergency calls, and over 7,000 radio transmissions on a daily basis.

## **TEXT-TO-911 PROJECT**

In 2008 we replaced our phone system with one that would be compatible with 911 next generation technology. This phone system is an I.P. based system and enables our center to be current with technology, as well as grow with the coming next generation 911 technology.

After installation of this phone system, we were approached by our State 911 Coordinator and asked if we would be willing to be the beta site for testing text-to-911 in our State. We agreed to work with the software developer (Intrado, Inc.) and the a wireless carrier in the State of Iowa to move forward with this project.

In the spring of 2009 we started the installation and testing process of accepting text-to-911. There was little to no impact to our operations during the installation as it was mostly done in the background. The dispatchers were trained on how the system worked, which training was minimal. We attribute this to the fact that the program was designed to be very similar to TDD technology, which the dispatchers were familiar with. After a few months of testing, we took the first live text-to-911 call from the National NENA Conference in June of 2009. This was done via satellite.

We also held a press conference announcing that our Center was now capable of accepting text-to-911 calls from a specific wireless carrier in our State. Participants

in the press conference included representatives from our local public safety agencies, local city and county officials, State legislatures, as well as representatives from the speech and hearing impaired community and a representative from the U.S. Attorney's office, who oversees ADA compliance in our State.

Since going live with our project, there has been very little impact to operations of the Center and in fact it has been a seamless transition to accepting these calls. While the SMS call volume has not been overwhelming, the calls received have proven the need for this kind of technology. The calls we have received range from domestic abuse situations where the victim was fearful for her life if the suspect overheard her calling 911, to a child texting 911 because they were being abused by a parent. In one particular case, a domestic abuse victim's ability to text 911 resulted in no harm coming to her and the suspect being arrested on a violation of a no contact order.

The low call volume is most likely attributed to the fact that there is only one wireless carrier in our State that has this technology enabled for their customers. While we have reached out to other carriers, we have been unsuccessful in getting any other carrier in our State to move forward with this technology. This has been the biggest frustration for us with this project. We are truly ready and willing to accept all text-to-911 calls; but are limited due to the wireless carriers' refusal to provide this technology to their customers.

In 2010, we agreed to accept all text-to-911 calls for the customers of one wireless carrier in the State of Iowa, regardless of jurisdiction. This has proven to be successful as well. If we get a SMS call from someone in a different County the Dispatcher will take the information and transfer it to the 911 Center where the subject is texting from so that help can be sent to them.

We continue to accept SMS calls for one carrier in the State of Iowa. We firmly believe that text-to-911 technology is desperately needed throughout the Country and that it will save lives.

## **SUMMARY**

SMS text-to-911 is an evolutionary path to NG 9-1-1 capabilities rather than an interim or short term solution. Texting in general is an acceptable means of communication and is used throughout the country. The expectation that text-to-911 already exists throughout our communities was clearly demonstrated during the Virginia Tech shooting incident. Unfortunately, many students lost their lives, which might very well have been saved, had the technology existed then.

While this technology can clearly save lives, it also offers the hearing and speech impaired communities the means to have the same access to 9-1-1 as anyone else, without having to purchase adaptive equipment. It can also be argued that it will

assist in ADA compliancy and meets the requirements of access for those individuals who may have physical disabilities that would otherwise prevent them from accessing 911 on their cell phones.

While there may be concerns regarding the use of SMS text-to-911 such as lost, delayed or out-of-sequence messages can be addressed and overcome. I would point out, that to our knowledge; we have not experienced this at our Center. SMS text-to-911 is reliable and available, as clearly demonstrated in our project. Comments filed in this docket by Intrado, Inc. and the University of Colorado demonstrate through test environments that SMS text-to-911 is a reliable solution to provide much needed text access to 9-1-1.

Just as with Cellular Phase I and Phase II deployment, a staged approach of deploying first for use by the disabled community via a relay center is reasonable and will build a foundation for additional NG9-1-1 capabilities, such as photos, videos and other data. I would point out that when Cell phone access to 911 was introduced, it was introduced in stages as well and in my opinion, is a proven method for deployment of Next Generation 911 technology. Although there are some that may prefer full direct-to-PSAP text deployment from the start, this staged approach provides the opportunity to move the ball forward now and allows carriers and PSAPs additional time to advance their capabilities to receive text.

I strongly encourage the FCC to seize this opportunity and move forward to provide this much needed solution. It works, it is reliable and it saves lives.

Respectfully submitted,

Black Hawk Consolidated 9-1-1  
Communications Center

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