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STATE OF HAWAII
DEPARTMENT OF ACCOUNTING
AND GENERAL SERVICES

Enhanced 911 Board

December 13, 2012

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12TH Street SW
Washington, DC 20554

VIA ELECTRONIC FILING

Re: Comments

Public Safety And Homeland Security Bureau Seeks Comment On The Legal And Statutory Framework For Next Generation 9-1-1 Services Pursuant To The Next Generation 9-1-1 Advancement Act of 2012, PS Docket No. 12-333, Facilitating the Deployment of Text-to-911 and Other Next Generation 911 Applications, PS Docket No. 11-153, and Framework for Next Generation 911 Deployment, PS Docket No. 10-255.

Dear Ms. Dortch:

The State of Hawaii Enhanced 9-1-1 Board hereby respectfully submits our comments in response to the Public Notice released by the Federal Communications Commission in the aforementioned proceedings.

The 9-1-1 oversight board was established by legislation in 2004 for the State of Hawaii. The board has provided funding to the counties to further 9-1-1 technological advancements with the overall goal to better serve the public when they are in need of public safety help. Our experience in Hawaii has been beneficial to have our statewide governance structure. We encourage Congress to promote the establishment of state oversight bodies as a mechanism to enable constant improvements given the 9-1-1 new and emerging technologies.

Congress can assist states with support to the National Emergency Number Association (NENA) in establishing ANSI objective standards. Standards for capacity, security, scalability, and redundancy are extremely important to the nationwide deployment of NG9-1-1. Congress should implement policies with reasonable deadlines, and provide funding program support to achieve NG9-1-1 nationwide.

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The Federal agencies involved in NG9-1-1 needs to be streamlined for greater effectiveness. The FCC, NHTSA, NTIA, and DHS each have a role; however those roles are not clearly defined and lend themselves to confusion. Who will coordinate with the states activities is not always delineated.

In the short term it would helpful for Congress to emphasize to Secretary of Homeland Security and the Attorney General the importance of 9-1-1 as the first link in the emergency communication chain. These are the two largest sources for public safety grants and programing at the Federal level. Currently these agencies place limited emphasis on an improvement program for NG9-1-1. Congress should establish the policy directive that 9-1-1 improvements and accelerating the deployment of NG9-1-1 are a nationwide priority for these agencies.

Moving to NG9-1-1 requires the assimilation of many existing landline systems. Federal resources can ensure connectivity between states and facilitate the efforts with the future national public safety broadband system (FirstNet) and NG9-1-1.

Congress can promote and ensure a consistent nationwide planning process encouraging deployment of NG9-1-1 while respecting the authority of local, state, and regional public safety jurisdictions. There does need to be clear delineation of responsibilities between local, state, and national authorities.

Funding at the state level for 9-1-1 today is outdated and will not be able to provide the necessary resources for nationwide NG9-1-1. Congress can encourage Public Utility Commissions, local governments, and states to review and refine their legislation and funding mechanisms. NG9-1-1 funding should be reasonable, equitable and non-discriminatory. Funding mechanisms for NG9-1-1 must be overhauled for the specific purpose to deploy NG9-1-1 and must be sufficient to achieve the goal. The current funding models will not work for NG9-1-1.

Additionally, as the new Congress prepares appropriations statutes, it would be beneficial for Congress to advocate that all public safety funding streams explicitly include 9-1-1 and NG9-1-1. This is as simple as inserting the words "9-1-1/Next Generation 9-1-1" after the words "public safety" in any appropriations legislation that bears on the subject.

The present 9-1-1 environment is transitioning from a single vendor architecture to multiple vendors. This is a major change for both governments and industry. Having choice opens the field to competition as we transition from legacy 9-1-1 to NG9-1-1. However the FCC will need to ensure that rules remain technology neutral.

We appreciate consideration of our comments and we applaud the Commission for your leadership towards achieving a nationwide NG 9-1-1 system.

Respectfully Submitted,



Chair Clayton Tom
Enhanced 9-1-1 Board State of Hawaii



Thera Bradshaw
Executive Director