



**MissionCriticalPartners**

February 24, 2014

**VIA ECFS**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, DC 20554

**Re: Comments – Fifth Annual Report to Congress on State Collection and Distribution of 911 and Enhanced 911 Fees and Charges, PS Docket No. 09-14**

Dear Ms. Dortch:

Mission Critical Partners, Inc. (“MCP”) appreciates the opportunity to submit comments in the matters related to the above-referenced proceedings.

MCP provides executive consulting to clients with public and life safety missions throughout North America. Our client base consists of public safety answering points (PSAPs) in more than half of the United States. The comments herein represent our experiences with, and on behalf of, those clients rather than advocacy for a particular product, technology, or other interest.

With a professional staff of more than 80 employees, the MCP team is uniquely qualified to comment on this issue. The majority of our staff are former public safety and PSAP professionals who have held leadership positions and have dealt firsthand with critical funding issues for 9-1-1. More recently, our work with state 9-1-1 agencies and PSAPs has focused substantial attention on the inadequacy of legacy funding models, many of which have remained unchanged since the inception of 9-1-1 service in those areas. This issue has negatively impacted those agencies seeking to proactively deploy Next Generation 9-1-1 (NG9-1-1) services.

Our comments seek to answer several of the questions posed in the Commission’s Public Notice, specifically:

- *“What conclusions, however preliminary, can be drawn from the information submitted by respondents regarding the sufficiency of funding resources directed to the development and deployment of NG911 services?”*

**MissionCriticalPartners**

690 Gray's Woods Boulevard | Port Matilda, PA 16870 | 888.8.MCP.911 or 888.862.7911 | [www.MCP911.com](http://www.MCP911.com)

- *“With respect to future data 911/E911 data collections pursuant to the NET 911 Act, how might the Commission improve its data collection to better capture the state of expenditures on NG911 systems by state and other jurisdictions?”*

While the data collected by the Commission provides some baseline that was unavailable prior to the NET 911 Act, the data remains inadequate to provide anything more than a macro perspective of 9-1-1 funding across the states.

Moreover, a reconciliation of the funding models described by legislation in some states with the figures reported is inconsistent. Metrics crucial to a meaningful analysis across the 9-1-1 community, such as the cost-per-call or the cost-per-position, continue to be elusive with the dataset currently collected. While it is possible to make some general comparisons with the data to identify trends, specific comparisons across the entire 9-1-1 system are impossible due to the variability of the data.

For example, when calculating the cost per capita with the data reported, the results vary from \$1.06 to \$21.83 – values that clearly do not tend to the mean.<sup>1</sup> Alternatively, an analysis of cost per PSAP results in values that range from \$46,348 to \$2,412,968 – again, values that do not tend to the mean.<sup>2</sup> It is difficult to imagine that the cost per PSAP could vary by a factor of more than 50 between two PSAPs. In all likelihood, the call volume of the PSAPs in these extreme cases is significantly different, and an analysis of the cost-per-call could be more realistic and closely aligned.

In order to achieve a more uniform and meaningful dataset, a new collection method and dataset are needed. We recommend that the Commission consider leveraging the variety of web technologies available to develop an entry system that is available online, and provides built-in auditing and validation tools. Simple web technologies and programming could adjust inputs to control for variability, and would adapt dynamically to address state-specific circumstances. A system of this type would also provide a uniform method for the entry of similar data elements.

In addition, we recommend that the Commission consider gathering additional data points to provide operational context to the data that are gathered. While funding is an important element, without the appropriate operational context the data are useful for little more than a historical perspective of 9-1-1 funding levels. We recommend that the Commission consider collecting several additional elements that would require little additional effort on the part of the reporting

---

<sup>1</sup> Louisiana, \$4,912,926.00 collected, 2013 Population estimate: 4,625,470. Mississippi, \$65,290,042.40 collected, 2013 Population estimate: 2,991,207.

<sup>2</sup> Louisiana, \$4,912,926.00 collected, number of PSAPs registered in FCC Master PSAP Registry: 106, District of Columbia, \$12,064,842.00 collected, number of PSAPs registered in FCC Master PSAP Registry: 5 [which, as the result of adding U.S. Naval PSAP facilities, appears to misrepresent the actual number of primary PSAPs in D.C.].

parties. Leveraging other 9-1-1 data collection efforts (e.g., the National 9-1-1 Program's National 9-1-1 Profile Database) will help identify existing available data, reduce duplicative reporting requirements, and enhance the quality and breadth of data available for analysis.

Specifically, we recommend that the Commission consider the collection of the following data points:

1. **Number of PSAPs.** Require that annual submissions contain an accurate count of the number of *active* primary and secondary PSAPs in each reporting area. Additionally, reporting authorities should annually reconcile the Commission's Master PSAP Registry for their area of responsibility in order to provide a true accounting of the number of actively funded PSAPs nationwide. This registry also holds great potential within the NG9-1-1 system, allowing it to be used as a resource to permit national routing and delivery of 9-1-1 calls.
2. **Revenue Model.** Require that at least a high-level description of each state's funding model is described or selected. For example, does the state require remittance for wireless, wireline, Voice over Internet Protocol (VoIP), and/or prepaid services? What is the level of remittance for each, and how is it determined? To what extent are existing revenues insufficient and need to be subsidized by state and/or local general funds?
3. **Remittance Model.** In conjunction with the previous item, require that each report contain a basic description of the remittance model. For example, do service providers remit directly to the state, to counties, to local jurisdictions, or to a combination of these?
4. **Eligible Uses of Funds.** Our experience throughout the states has shown that the eligible uses of 9-1-1 remittances vary widely from state to state. Require that each report contain a simple selection of common expenses inherent to the provision of 9-1-1, and whether they are considered eligible for funding in that reporting area. For example, are 9-1-1 remittances eligible for personnel costs, training of telecommunicators, travel expenses, computer aided dispatch systems, or radio networks? Do the eligibility requirements differ by remittance type? That is, are some expenses eligible for only wireless funding (Text to 9-1-1) but not wireline funding?
5. **Calltaking Positions.** One metric to provide a more uniform analysis of 9-1-1 expenditures is the cost per calltaking position. Currently, this data is not captured by any agency. Require that each report provide, either in detail or as an aggregate, the number of active calltaking positions within the reporting area that remittances fund.
6. **9-1-1 Call Volume.** An accurate accounting of 9-1-1 call volume nationwide does not exist. When coupled with a uniform funding dataset, a true accounting of 9-1-1 call volume would allow for the determination of what is arguably the most valuable metric

available – cost per 9-1-1 call – which could be used to identify trends, to detect disparities between PSAPs and regions, and *ultimately show the fiscal benefits possible from sharing resources and the transition to NG9-1-1.*

We also recommend that the Commission and State 9-1-1 agencies investigate the variety of 9-1-1 business intelligence and analytics tools that are available from several vendors. These solutions are agnostic to the call processing equipment in use by a PSAP, and they provide real-time and historical call volume statistics as well as many other metrics. While admittedly not a small initiative, a solution of this type at each PSAP nationwide would provide a dataset of immeasurable benefit to the 9-1-1 community.

7. **Funding Issues.** Each state experiences remittance issues or legislation that may not capture all of the available revenue sources. Each report should provide a description of any funding issues or challenges that exist within the reporting area, so that not only the Commission is informed of the challenges states face, but also other states can use the data to see commonalities that exist and methods to address them. For example, does the state report that there are disparities between access lines provided by a carrier and their remittances? Has the transition of an ILEC to voice-over-IP status created funding shortfalls? Do some carriers collect 9-1-1 fees, yet fail to remit them based on their interpretation of what constitutes access to 9-1-1 service?

We recommend that the Commission *strongly* consider revising reporting requirements to include some, if not all, of the data elements listed previously. The ultimate goal of such an effort should be a normalized cost-per-call that would allow for the most accurate analysis of 9-1-1 funding in the country. Our work with PSAPs nationwide has shown that the cost-per-call, when controlled for variables in the reported data, results in the most meaningful metric to evaluate network, technology, and operational costs of a 9-1-1 system. Analyzing data across multiple years will yield critical insight into how the implementation of NG9-1-1 is affecting costs for all parties.

Collection of an enhanced set of data assists the Commission in its efforts to track progress toward national implementation of NG9-1-1 and would assist members of Congress to fully understand the needs of the 9-1-1 community. Recognizing that the submission of data is currently voluntary, there needs to be expanding authority to collect (and assistance for states to prepare) this data.

Lastly, we address the Commissions questions regarding the deployment of NG9-1-1 networks:

- *“Based on respondents’ filings, are 911 and E911 funds being used to deploy NG911 systems and capabilities in a logical and sustainable fashion to ensure NG911 can meet the public’s expectations for enhanced emergency response?”*

- “Are NG911 systems being deployed consistently across the nation?”

Mission Critical Partners has worked, or is currently working, with a diverse set of public safety clients. Our experience is that NG9-1-1 systems are *clearly not* being deployed consistently across the nation. In many states, as stated previously, 9-1-1 funding levels are not keeping pace with the rising costs of the legacy networks, let alone providing additional funds for the deployment of NG9-1-1 networks and equipment. While there are some exceptions, many PSAPs operate in environments without robust and coordinated NG9-1-1 deployment plans, and are thus reliant on their own staff and planning capabilities to identify and implement local or micro-regional solutions.

We encourage the Commission to seek funding for regional and statewide planning of NG9-1-1 networks, as well as efforts to coordinate the interconnection of the locally controlled networks. Sans sufficient planning funding, NG9-1-1 networks and equipment will continue to roll out at only a modest pace.

Coupled with NG9-1-1 planning and coordination funding, we again *strongly* urge the Commission to consider changes to the reporting of 9-1-1 expenditures. We feel strongly that a true accounting of the costs of the current 9-1-1 system would provide a compelling message that would spur planning and deployment of NG9-1-1 systems nationwide.

We welcome the opportunity to discuss these issues with Commission staff, as well as a strategy to collect additional pertinent data and the technology that would support such an effort.

Respectfully submitted,

/s/

---

Sean Petty  
John Chiaramonte  
Mission Critical Partners, Inc..  
690 Gray's Woods Blvd  
Port Matilda, PA 16870  
(888)-862-7911  
[SeanPetty@MCP911.com](mailto:SeanPetty@MCP911.com)  
[JohnChiaramonte@MCP911.com](mailto:JohnChiaramonte@MCP911.com)

Submitted February 24, 2014