

February 5, 2015

Commonwealth of Virginia
E9-1-1 Services Board

Dear Members of the E9-1-1 Services Board:

We, as Directors of the eight (8) PSAPs in Region 7 (comprised of the City of Alexandria, Arlington County, Fairfax County, Loudoun County, City of Manassas, City of Manassas Park, Prince William County and Stafford County), write to extend our appreciation for the E9-1-1 Services Board initiative to conduct a Feasibility Study for a Statewide Emergency Services Internet Protocol (IP) Network (ESInet) for 9-1-1 and for recently releasing the study for comment by the Virginia 9-1-1 Public Safety Answering Point (PSAP) community. We are fully supportive of efforts to take serious action to move Virginia 9-1-1, public safety agencies, and the residents they serve, into the Next Generation of 9-1-1 (NG9-1-1), and believe the other 115 PSAPs in the Commonwealth are similarly supportive. The recently released report is, in our opinion, the most comprehensive ever conducted on the *State of 9-1-1 in the Commonwealth of Virginia* and we look forward to your consideration of the recommendations contained therein and the steps the Board will take in the near and long term.

The report is appropriately detailed and contains significant insights and many nuanced recommendations, particularly when the study focuses on funding considerations. Light reading it is not!

Considering the upcoming Board workshop meeting on February 12th, we wish to highlight to you some key recommendations from the report that we believe capture the main tenets of the Feasibility Study.

Of the 92 recommendations provided we have selected the 'Top 15' from a 9-1-1 PSAP perspective and we feel these represent the primary strategic recommendations that will drive key decisions..... as Virginia moves forward toward NG9-1-1. The Top 15 are contained in the table attached. The report adequately describes the rationale for the 92 recommendations.

We want to highlight these 15 recommendations as perhaps key discussion points in your deliberations and considerations. We have added a note in the attached table that cross references to the page number in the Feasibility Study should you elect to use the table to maneuver through the report.

Like many other regions our management structures as PSAPs fall under different organizations (some are independent, some report through the police department and some through the sheriff department). Due to these differences in management structures, unanimity on recommendations about shifting funding from Virginia State Police and Sheriff's organizations (first recommendation in the attached table) is not easily gained nor explained in such a brief letter as this one. And we wish to make that clear that the Region 7 PSAPs have varying opinions about the first recommendation and would need to engage in a full discussion to fully describe our individual positions consistent with our individual management structures. What we can agree on is that the issue needs to be discussed to understand its full impact on longer term funding issues (federal grant programs) for the PSAP community. We look forward to hearing your deliberations on all the recommendations and extend our willingness to engage in further discussions and follow-up.

We are eager to work with the Board and the ISP Staff.....through the Regional Advisory Council recommendation contained in the report and to begin active consideration of efforts to put the report's recommendations into place.

Again, thank you for your dedication to this endeavor and to the 9-1-1/public safety community.

Respectfully and with appreciation,

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**Top 15 Representative Recommendations of Virginia Statewide Feasibility Study
PSAP Perspective (Not In Priority Order)**

The Commonwealth of Virginia Internet Protocol (IP) Based 9-1-1 Network Feasibility Study Report, prepared by Mission Critical Partners (MCP) contains 92 recommendations. The Northern Virginia PSAPs (Region 7) are continuing to review the report in detail but we wish to provide our perspective, as a collective group of PSAPs, on which of the 92 recommendations in the Study Report we recommend as most representative of the issues of the PSAP community. The breakout of all of the 92 recommendations by Category is shown below:

Feasibility Study Report Category	Total Number of Recommendations By Category	Cross Reference to Feasibility Study Report (Page #)
Operational Feasibility	21	42
Technical Feasibility	19	129
Governance	14	166
State 9-1-1 Office	8	171
Funding and Resources	20	176
Records and Liability Protection	4	183
Rulemaking and Regulatory	6	185
	92	

We support the other recommendations of the report, yet given the total number of recommendations we believe the 15 highlighted recommendations below are a representative 'Top 15' for primary discussion and consideration by the Board and many of the remaining 77 recommendations can be analyzed and prioritized around these Top 15 recommendations.

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Item #	Feasibility Study Area	Recommendation # Study page ref.	Study Finding	Study Recommendation
1	Funding and Resources	1 (pg. 176)	E-911 funds transfers to other departments for operational expenses (VSP, Sheriff) be eliminated or limited until NG9-1-1 is fully operational	E-911 funds transfers to other departments for operational expenses (VSP, Sheriff) be eliminated or limited until NG9-1-1 is fully operational
2	Funding and Resources	6 (pg. 177)	Wireless 9-1-1 providers are allowed to be reimbursed for their administrative costs by statute similar to wireline providers' ability to retain administrative cost reimbursement.	The FCC has declared that cost recovery is no longer a requirement for implementation of wireless 9-1-1 and the Commonwealth is fully deployed with wireless Phase II services. Cost recovery should be eliminated.
3	Governance	11 (pg. 169)	Statute provides for stakeholder involvement.	While statute outlines a broad spectrum of representation on the E-911 Services Board, a review of the Board composition is recommended as the Board takes on a stronger and more direct statewide coordination role for NG9-1-1 with additional members representative of the electorate and general public. The input and expertise of the private enterprise partners should continue, but in an advisory capacity. Commercial representation as it exists today may not be an effective representation of the NG9-1-1 configuration in the future network. If commercial entities have a seat on a policy board when their role in NG9-1-1 may significantly change and new partners are not represented, issues

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				<p>of fairness and competitive neutrality can be questioned. There is also no guarantee that the current 9-1-1 provider will continue to play the same role in the systems employed by the Commonwealth going forward. MCP recommends that commercial members be made non-voting Technical Advisors to the Board.</p>
4	Technical	9 (pg. 130)	<p>A single statewide provider of NG9-1-1 services will be difficult to meet the requirements of all localities.</p>	<p>The Commonwealth should consider working with each region to develop a list of common requirements for the ESInet and NG9-1-1 services. The findings should be consolidated into an executive report and the level of support determined from each locality for a single, statewide ESInet based on the jointly developed requirements.</p> <p>If the majority of the localities are in support of a state-level ESInet, then through a competitive ITB process, Virginia should procure and deploy a state-level ESInet with an i3 solutions provider offering the services to all localities. PSAPs will have the choice of opting in to the state ESInet or deploying their own regional NG9-1-1 solution. Regional ESInets may be deployed but would be required to interoperate with the state-level ESInet and other regional ESInets.</p>

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				<p>However, if a majority of the localities are not in support of a state-level ESInet, then a less optimal and more costly solution would be for localities to develop their own regional solutions. To minimize double billing challenges, it is recommended that regions align as closely to existing legacy selective router groupings as possible. Each region should require solution providers to provide interoperability with adjacent legacy and NG9-1-1 routing systems.</p>
5	Governance	5 (pg. 168)	Local authority.	<p>Any changes to statute should preserve a local jurisdiction's duty to manage response to 9-1-1 calls for service and local networks.</p> <p>MCP recommends the authority to manage local 9-1-1 services and local response is codified in statute; currently it is implied.</p>
6	Governance	12 (pg. 169)	The state has fully implemented balanced stakeholder involvement.	<p>Town Hall meetings revealed that increased local jurisdiction or representation is desired.</p> <p>Depending on the ultimate plan for how NG9-1-1 will be structured and implemented in the Commonwealth, the composition of the Board may need to be revised to better reflect the</p>

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				<p>NG9-1-1 environment. Other agencies or disciplines such as an IT/systems management, or a GIS practice representative, Internet service provider or Broadband representative, which could be integrated either as voting members or as Technical Advisors, should also be considered. MCP recommends that an additional CIO/Communications Technology Officer (CTO) representative be added to the Board.</p> <p>A special needs community representative is also an important consideration. MCP recommends that a new member representing the deaf and hard of hearing community be added to the Board.</p> <p>The health and safety of the public, life and property is the reason for 9-1-1. A public representative can provide the necessary “sanity” check and real-world experience that will help the Board make sound policy decisions that will withstand taxpayer scrutiny and desire for sound government actions. MCP recommends that a member of the public be added as a voting member of the Board,</p>

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7	Effective Fund Management	3 (pg. 233)	The need for future capital upgrades will necessitate setting aside sufficient funding for capital improvements.	The purchase and implementation of an ESInet and NG9-1-1 services requires a multi-phased multi-year approach and sufficient capital resources must be made available. A capital funding methodology should be established and used to incentivize regional NG9-1-1 projects and the development of a state-level ESInet and services. As recommended in other sections of this feasibility study, the Board should consider a comprehensive evaluation of the needed funding for NG9-1-1 once a design plan has been established.
8	Effective Fund Management	2 (pg. 233)	Existing surcharges and taxes alone may no longer be adequate to fund both current and future systems.	Existing legislation, while it includes all traditional methods for revenue generation for 9-1-1, includes a number of concerns that should be evaluated. Existing surcharges and taxes alone may no longer be adequate to fund both a legacy 9-1-1 system and a transition to next generation services. Taxes will necessarily be combined with a variety of other funding sources and options to ensure adequate funding for legacy and NG9-1-1. Because the current tax and surcharge methods may no longer be adequate as predictable or equitable

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				among all service types, new support mechanisms should be considered to sustain 9-1-1 service.
9	Funding and Resources	9 (pg. 178)	Available grant funding is diminished by distributions to other agencies and funds.	In order to incentivize NG9-1-1 implementation in the Commonwealth, additional grant funding should be made available to PSAPs, especially those interested in pursuing regional approaches; an increase in the wireless E-911 fee should be requested.
10	Governance	10 (pg. 168)	There is a documented process in place for annual review of statute and regulations and the ability to recommend changes to legislation.	As cost projections become more specific and the need for funding the transition from legacy networks to NG9-1-1 networks becomes clearer to the E-911 Services Board, it may be necessary to request a change to the wireline (Communication Tax), wireless (and prepaid) 9-1-1 fee; it may be necessary to review the entire funding structure for 9-1-1 in the Commonwealth. MCP recommends elimination of the distribution to the Compensation Board, wireless cost recovery, and the VSP fund transfer in order to help fund NG9-1-1 implementation.
11	Technical	15 (pg. 130)	Synchronization of the MSAG with the GIS centerline and address point data is critical to the preparation for NG9-1-1.	Each locality should analyze their MSAG and ALI tabular data to their GIS data. Discrepancies between the data sets must be resolved by public

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				safety addressing specialists. GIS, MSAG and ALI data should all align. The on-going maintenance of the MSAG and ALI may be managed directly in the GIS data management tool with tabular data export to maintain the legacy MSAG and ALI databases.
12	Effective Fund Management	10 (pg. 234)	Regional ESInets should be assisted and entered into agreement to ensure consistency with the Commonwealth's NG9-1-1 Master Plan.	The E-911 Services Board should direct staff to work with the Regional Advisory Council to develop interlocal agreements and formats for regional ESInet plans to be approved by the Board, consistent with the Commonwealth's NG9-1-1 Master Plan.
13	Operational	2 (pg. 42)	Sound risk management practices are essential as services become more complex.	It is recommended that 9-1-1 service providers demonstrate adherence to the reliability measures outlined in the FCC's 911 Reliability Report and Order adopted on December 12, 2013.
14	State 9-1-1 Office	7 (pg. 172)	VITA provides support to the E-911 Services Board and administers the wireless program as directed by the Board.	VITA should continue to provide the necessary support to PSC. The role of the Regional Coordinators should be enhanced. Duties and responsibilities include many of the recommended activities in this report, as deemed appropriate by the E-911 Services Board. Appropriate funding to carry out the

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				program and mission of the E-911 Services Board should be provided.
15	State 9-1-1 Office	4 (pg. 171)	Roles and responsibilities of the E-911 Services Board are limited to wireless and future technologies.	NG9-1-1 will significantly change the way 9-1-1 services are provided in the Commonwealth. A new governance model for the statewide NG9-1-1 system will be required. The structure of the Board should change to be more representative of the NG9-1-1 services and systems.