

April 17, 2015

Commonwealth of Virginia
E9-1-1 Services Board

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

We, representatives of Region 5, comprised of the Cities of Franklin, Newport News, Norfolk, Poquoson, Virginia Beach & Williamsburg, the Counties of Gloucester, Isle of Wight, James City, Southampton, & York and the Eastern Shore, would like to take this opportunity to thank the Virginia E9-1-1 Services Board for conducting what we feel is the start of a long term strategic process for the planning, implementation, and service to the next generation services of 9-1-1 in the Commonwealth of Virginia. We would also like to thank you for your consideration of the recommendations we have outlined in the attached table.

Region 5 members have conducted three face-to-face meetings, several phone calls and numerous email exchanges, as well as attended or listened in on the working E9-1-1 Services Board session, the E9-1-1 Board Meeting on March 12, 2015 and attended the Regional ISP meeting at HRPDC on NG 9-1-1/GIS on March 20, 2015. We find a number of points throughout the report that we agree are reasonable, and also a number that require further inquiry, interpretation or change. Below we have summarized our comments and suggestions. As each of you are aware this is a very important topic that will require much collaboration between the E9-1-1 Services Board, VITA staff, the PSAPs, and commercial partners across the Commonwealth as we move forward to provide critical NG9-1-1 service to the citizens and visitors of the Commonwealth.

We agree 9-1-1 is an essential *Public Safety Service* and is managed and delivered squarely in the hands of local jurisdictions. In delivering this service, it is extremely important not to lose sight, input or participation from those representing the **LOCAL** 9-1-1 community. A partnership with the PSAP community is paramount to move forward with recommendations from the report. As members of Region 5, we stand ready to participate in all aspects of the 9-1-1 feasibility study as a partner to the E9-1-1 Services Board and VITA staff. Transparency throughout this process will bridge the credibility needed to move forward with the changes required to shift to NG9-1-1.

Representatives from Region 5 commend the board for taking action at its March 12, 2015 meeting to establish a Subject Matter Expert (SME) workgroup consisting of PSAP representatives, IT specialists, etc., and we are recommending Terry Hall as the Region 5 representative.

We would also like to point out the report has several inconsistencies and causes concern regarding the definitions of managed services. After review of the Guiding Principles listed on pages 186 through 188, we discovered the recommendations do not generally appear to support the stated Guiding Principles. It is imperative we work in partnership to embrace national standards and guidelines in the Commonwealth. This will allow consistency of 9-1-1 services at the local level and provide local governing bodies the opportunity to continue/aid in the decision making process as we move forward with NG9-1-1 in the Commonwealth.

A very aggressive schedule has been presented to move forward with changes in legislation by August 1, 2015. We are concerned about the time line at which VITA staff proposes legislative changes as these changes may lose transparency and not involve all stake holders. Legislation should be deliberate and precise with no overarching side effects. We agree with Chief Middleton who expressed concern about partnering with the PSAP Community to have buy-in for legislative change and trying to negate any unfunded mandates.

As Representatives of Region 5 we feel that this is one of the most important decisions facing Public Safety today. In conclusion we stand ready to work with VITA and the E9-1-1 Services Board on this very important project.

Respectfully,

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Jerry Smith
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Southampton County

Lori Stiles
Interim Director
City of Virginia Beach

Terry Hall
Chief of Emergency Communications
York-Poquoson-Williamsburg

	Location	Findings	Comments
Operational Findings and Recommendations	Section 1 Page 42	System management of an ESInet will require some level of dedicated staff at the statewide 9-1-1 authority level, or within VITA.	Where does the funding come from?
	Section 3 Page 42	Procurement of mission critical systems on a local basis leads to technology silos that inhibit interoperability.	It should include NG 9-1-1 products not CAD, EMD, etc., specifically CPE. We should adopt i3 as the state standard. This would keep the Commonwealth from becoming a silo in the NG9-1-1 arena.
	Section 4 Page 42	There is significant diversity in call handling software (seven vendors/numerous software versions) deployed across the Commonwealth. The disparity prevents effective sharing of calls and location information.	If it is i3, it shouldn't matter how many vendors sell equipment. Additionally, what qualifies the term "QUALIFY"
	Section 6 Page 42	Fifty percent of PSAPs plan to replace or upgrade their call handling systems by the end of 2016.	Currently, it is incentivized under the current grant guidance. However, it is not a one size fits all situation
	Section 7 Page 42	The disparity in CAD systems across the Commonwealth (17 vendors/multiple platforms and software versions) is much greater than the disparity in call handling solutions. The wide variance in CAD systems will leave the PSAP operational landscape largely unchanged even if regional ESInets are deployed.	CAD has nothing to do with NG 9-1-1 and it should not be the charge of the E9-1-1 Services Board. These technologies have overarching consequences such as RMS, MDT and other non CPE related systems.
	Section 8 Page 42	Changes to CAD systems will have an impact on multiple agency systems, which can cause resistance and unwillingness to move forward.	CAD has nothing to do with NG 9-1-1 and it should not be the charge of the E9-1-1 Services Board.

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	Section 9 Page 43	The current approach of each PSAP maintaining its own logging recorder is not cost effective or efficient in an NG9-1-1 environment. Multiple PSAPs and agencies may require dynamic access to logged data that will not be possible if there are a multitude of individual logging recorders storing the relevant information.	Centralized vs regionalized, both will work need to have further analysis.
	Section 13 Page 43	VITA should take a leading role in establishing an environment that fosters mutual aid and support	Mutual aid agreements and MOUs between PSAPs and regions currently exist throughout the Commonwealth. Need a better definition of mutual aid.
	Section 14 Page 43	The issue of dispatch capabilities must be forefront when regions are planning their backup strategy and drafting mutual aid agreements.	This should remain at the local level and based on hosted, non-hosted and regional applications.
	Section 15 Page 43	PSAP training that aligns with national standards and best practices is key to effective interoperability and providing uniform levels of service	This should be tightly coordinated with DCJS training standards currently approved by the Commonwealth of Virginia
	Section 16 Page 43	Performance metrics provide agencies with the ability to evaluate the operational level of service they are providing to the public	This should not fall under the E9-1-1 Services Board. This is a local decision.
Governance	Section 1 Page 166	Statute provides for statewide coordination for wireless and future technologies.	Want a definition of coordination

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	Section 2 Page 166/167	Designated state 9-1-1 coordinator	Need definitions of what is the 9-1-1 program at a state level. Does this eliminate local authority?
	Section 3 Page 167	Statute defines jurisdictional roles and responsibilities.	Needs further clarification.
	Section 4 Page 167	Statute authorizes state advisory board to plan and implement a wireless and future technology system.	<p>We support the vendors not having a vote on the board and feel that their voices will still be heard in an advisory role.</p> <p>No decision has been made on the type of technology, hosted vs. Non-hosted, etc., however local government should be involved in the decision process in the equipment they buy and how they buy it. We do support national standards, best practice training as the system continues to evolve.</p> <p>This is confusing based on inconsistencies in guiding principles #11 that states "<i>Local government bodies should retain responsibility for PSAP operation.</i>"</p>
	Section 5 Page 168	Local authority.	Manage 9-1-1 locally not just the response to 9-1-1
	Section 8 Page 168	Statute provides for the authority to procure 9-1-1 components, but does not explicitly stipulate statewide authority for all types of 9-1-1 service	Should not be modified
	Section 9 Page 168	Statute does not prohibit, but does not foster	Do not agree on the authority to develop and adopt technical and operational

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		adoption of technical and operational standards for the statewide system	standard. 13 standards already exist.
	Section 10 Page 168	There is a documented process in place for annual review of statute and regulations and the ability to recommend changes to legislation	This should be carefully dealt with and reviewed by the effective parties and the domino effect that it could have on NG9-1-1 services
	Section 11 Page 169	Statute provides for stakeholder involvement.	Agree, commercial should be advisory in nature.
	Section 13 Page 169/170	Statute addresses MLTS as they relate to providing adequate information to 9-1-1.	The Regional Advisory Council should have direct contact with the board
	Section 14 Page 170	Statute is silent on the definition of 9-1-1 as an essential service of government.	Should read local government
State 9-1-1 Office	Section 4 Page 171	Roles and responsibilities of the E-911 Services Board are limited to wireless and future technologies	The existing legislative structure of the E9-1-1 Services Board is sufficient and any changes should not eliminate local authority (Less commercial vote)
	Section 7 Page 172	VITA provides support to the E-911 Services Board and administers the wireless program as directed by the Board	It appears throughout the document that one of the main roles of the regional coordinator would be mediators between the board and regional advisory committee. We do not support this.
Funding and Resources	Section 1 Page 176/177	Statute provides for dedicated funding only for wireless and future technology collections.	Define "other departments" Need to be cautious about taking money from the comp board or the State Police as it could have a domino effect on services.
	Section 8	The E-911 Services Board reviews and	Nothing in the finding references staffing

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	Page 178	approves the Division's budget prepared by VITA.	but the recommendation is to increase staffing levels.
Rulemaking & Regulatory Environment	Section 2 Page 185	The statutory environment does not provide for a comprehensive QA program for the 9-1-1 system	Is this Q/A for ESInet or for the locality?
	Section 4 Page 185	The statutory environment does not require a minimum training program for 9-1-1.	The Regional Advisory Council should have direct access/contact to the board. Training is not directly linked to NG 9-1-1 All training should be coordinated with DCJS
	Section 5 Page 185/186	The statutory environment does not address professional certification and accreditation	It takes away local authority
	Section 6 Page 186	The statute does not address emergency medical dispatch (EMD).	Not related to NG 9-1-1 takes away local choice, adds additional staff etc.
Effective Fund Management Practices	Section 2 Page 233	Existing surcharges and taxes alone may no longer be adequate to fund both current and future systems	The existing surcharges and taxes do not adequately fund today The deployment of NG 9-1-1 systems technology and end user devices is and will continue to be an evolutionary process
	Section 3 Page 233	The need for future capital upgrades will necessitate setting aside sufficient funding for capital improvements	Will this include the regional advisory councils and what will the approval process look like
	Section 6	The fixed pro-rate distribution rate may not	We agree that the current fixed pro-rate distribution doesn't reflect the current

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	Page 234	reflect current consumer behaviors.	consumer behaviors and is dated. The recommendations from the Regional Advisory Council should go directly to the Board and not through the PSC Coordinators and the Regional Coordinators.
	Section 10 Page 234/235	Regional ESInets should be assisted and entered into agreement to ensure consistency with the Commonwealth's NG9-1-1 Master Plan	What document is referred to as the master plan? Agree. However, the NG9-1-1 master plan should be drafted, vetted, and adopted by the Board prior to this recommendation.