Virginia 9-1-1 Services Board
PSAP Grant Program

FY20 NG9-1-1 Migration Program & PSAP Education Program

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INTRODUCTION

Executive Summary

The commonwealth is implementing Next Generation 9-1-1 (NG9-1-1) because the current analog network that provides 9-1-1 call delivery to Virginia Public Safety Answering Points (PSAPs) is going away. Over the next few years, 9-1-1 service providers will be decommissioning the selective router pairs that comprise the foundation of this legacy analog network. To address this issue, the 9-1-1 Services Board (the “Board”) conducted an NG9-1-1 Feasibility Study in 2015 and made the decision to transition to a statewide IP-based infrastructure, known as an Emergency Services IP Network (ESInet). With planning efforts completed, the Board is now focused on implementing NG9-1-1 throughout the commonwealth. Though the Board is recommending the Fairfax contract with AT&T for NG9-1-1 services, each locality will need to determine the most appropriate path.

The primary focus of the current PSAP Grant Program Guidelines is to lay out the process for determining and allocating funding for allowable NG9-1-1 migration costs during the multi-year NG9-1-1 deployment period, as well as continue to provide funding for 9-1-1 and GIS education and training in FY 20. As a result, this guidelines document contains two programmatic areas:

- NG9-1-1 Migration Program
- PSAP Education Program (PEP)

The NG9-1-1 Migration Program provides funding for NG9-1-1 migration expenses for eligible program participants throughout the Board established deployment period. Participants eligible to receive funding are primary PSAPs and secondary PSAPs currently served by a selective router pair. The amount of funding these PSAPs can receive will be based on the analysis contained in the NG9-1-1 Migration Proposal (MP - see appendix A). The purpose of the MP is to provide information about the AT&T NG9-1-1 solution, prerequisite work needed within the PSAP, and expected costs and funding provided by the Board. The goal of this document is to provide each PSAP/locality with all of the information needed to evaluate the AT&T solution and determine whether it will meet local needs.

Funding will only be provided to address items specifically identified in the proposal document. As a result, many items eligible for funding in previous grant guidelines will no longer be funded. PSAPs will demonstrate their acceptance of the information included in the MP by completing a Proposal Acceptance Letter (PAL - see appendix B). The MP and PAL will be considered a FY 20 NG9-1-1 Migration Program funding application.
The PEP provides funding to primary PSAPs for the purpose of obtaining 9-1-1 and GIS education and training. PSAPs have two funding options:

- $3,000 per primary PSAP for individual PEP requests
- $4,000 per primary PSAP for multi-jurisdictional PEP requests

This document contains information about the rules and requirements governing the PSAP Grant Program, the types of projects eligible for funding, and instructions for completing and submitting the grant application. However, the final authority to administer this grant program rests with the Board. The Board can amend, alter, or change these guidelines, as well as require the Grant Committee to undertake additional responsibilities not already specified in the guidelines. Requests from PSAPs for exceptions to the guidelines are discouraged.

**What is the PSAP Grant Program?**

The PSAP Grant Program will financially assist primary PSAPs and secondary PSAPs currently served by a selective router pair with NG9-1-1 migration costs identified in each PSAP’s MP. The program also provides funding to primary PSAPs for 9-1-1 and GIS education and training. Funding is made available through the Code of Virginia and administered by the Board. Funding is limited to those projects that fall within the programmatic areas identified in the guidelines. As a result, requests from PSAPs for exceptions to the guidelines are discouraged.

The PSAP Grant Program has been established in the Code of Virginia, §56-484.17(D):

Wireless E-911 Fund; uses of Fund; enforcement; audit required:

... 40 percent of the Fund shall be distributed to PSAPs or on behalf of PSAPs based on grant requests received by the Board each fiscal year. The Board shall establish criteria for receiving and making grants from the Fund, including procedures for determining the amount of a grant and payment schedule; however, priority shall be given to grants that support the deployment and sustainment of NG9-1-1.

**PSAP Grant Committee (PGC)**

The Board chair makes appointments to the PSAP Grant Program’s Grant Committee. Membership to the PGC will be staggered and appointments are made for three-year terms. Members can be reappointed for only one additional consecutive term. Committee members are appointed and serve
at the discretion of the Board’s chairperson. At all times, the Grant Committee membership shall consist of at least two Board members.

Furthermore, members of the Grant Committee should adequately represent the geographic diversity of the commonwealth, the varied operational capacities of Virginia primary PSAPs, and public safety professional organizations. Accordingly, a nine-person Grant Committee is established consisting of the following individuals:

- Two Board members (one of which will chair the committee)
- Four primary PSAP representatives (two of which will represent APCO and NENA)
- Three at-large members

Members with the same organizational affiliation will have different reappointment and replacement schedules:

- Replacement/Reappointment Schedule 1:
  - one Board member (co-chair)
  - two primary PSAP representatives (one of which will represent APCO)
  - and two at-large members

- Replacement/Reappointment Schedule 2:
  - one Board member (chair)
  - two primary PSAP representatives (one of which will represent NENA)
  - and one at-large member

Each year, in anticipation of the upcoming grant application cycle, the Grant Committee recommends grant guidelines and funding priorities. This edition of the PSAP Grant Guidelines will function differently. This document provides guidelines for a multi-year funding program to assist PSAPs in the deployment of NG9-1-1 and the FY 20 PEP. The Grant Committee will also make recommendations to the Board regarding the development of any criteria for awarding grants, and the proposal of any necessary changes to the administration of the PSAP Grant Program.

The Grant Committee will meet multiple times a year to evaluate all complete and eligible applications. Furthermore, the committee has the discretion to make case by case evaluations and recommendations for approval or disapproval of all submitted applications.
Auditing

The Board shall audit funding received by all recipients to ensure that it was utilized in accordance with the award requirements. If it is determined that the funding was misused, or if the guidelines were not adhered to, the commonwealth may take appropriate action to the extent permitted by law, including, and not limited to, requiring the return of the funds.
Definitions

Call Handling Equipment (CHE) – Telecommunications equipment used to receive calls for service from the public in the PSAP. This equipment must be must be NG9-1-1 ready (see page 8). CHE that is non-vendor supported (NVS), will become NVS during the migration period, or cannot be upgraded to be NG9-1-1 ready will be identified for replacement. This may also apply to technology refreshes of NVS supported hardware or operating systems becoming end-of-support. Funding is available for CHE projects (see page 10). CHE projects may include networking for shared services approaches, hosted solutions with collaborative procurement, and text-to-9-1-1. Bundled CHE purchases may include headsets, time sync, and maintenance.

Computer Aided-Dispatch (CAD) – A computer-based system which aids PSAPs by automating selected dispatching and record keeping activities. Funding for CAD is limited to upgrades or modifications identified in localities’ MPs as required for the deployment of NG9-1-1.

Interoperability – All NG9-1-1 ESInet solutions deployed in Virginia must be interoperable with the Fairfax County NG9-1-1 ESInet (see Appendix A).

Legacy Network Gateway (LNG) – The method to connect TDM-based primary PSAPs and secondary PSAPs currently served by a selective router pair to the ESInet.

Mapping System – A computer-based system to display location information in a geographic information system (GIS) or otherwise on a map within the PSAP. Funding for mapping systems is limited to upgrades or modifications identified in localities’ MPs as required for the deployment of NG9-1-1.

Memorandum of Understanding (MOU) - A formal document that guides and directs the parties of a physical consolidation project in regards to their affiliation and working relationship, inclusive of anticipated future arrangements, for the purposes outlined in the grant application submitted by the parties.

Migration Proposal (MP) – A document that provides information about the AT&T NG9-1-1 solution, prerequisite work needed within the PSAP, and expected costs and funding provided by the Board. The goal of the MP is to provide each PSAP/locality with all of the information needed to evaluate the AT&T solution and determine whether it will meet local needs.

Multi-jurisdictional Agreement (MJA) – A document, signed by appropriate representatives of all PSAPs/localities planning to participate in a Shared Services Project or a multi-jurisdictional PSAP education or training project.
It defines their working relationship and commitment to the project. The MJA must be included with the grant application.

Multi-Jurisdictional Projects – A project in which two or more primary PSAPs participate. For the purpose of these grant guidelines, these are physical consolidations and multi-jurisdictional PEP projects.

NG9-1-1 Deployment Period – A period established by the Board during which time PSAPs may submit a NG9-1-1 Migration Program funding request.

NG9-1-1 GIS Projects – A project that relates directly to the preparation of PSAP boundary, road centerline, and address point data based on approved NG9-1-1 data standards, applicable data models, and GIS best practices. These projects must include a long-term data maintenance plan. Funding for any day-to-day work or continued geospatial maintenance is not allowed. NG9-1-1 GIS projects eligible for funding will be based on results of the most recent GIS/MSAG/ALI analyses and identified in the MP.

NG9-1-1 Ready – Call handling equipment with the ability to receive SIP (see definition on page 9) communications natively at the call handling interface. This does not include the text-to-9-1-1 integration component, which can be added at a later date.

Non-Allowable Items – Historically these items have been bricks and mortar, outside security, card key systems, furniture, personnel salaries, benefits, and local project management time. However, this is not an inclusive list and applicants should seek guidance from ISP staff if they are unsure. In addition, only items that are specifically identified in the MP document as necessary to deploy NG9-1-1 would be eligible for NG9-1-1 funding. As a result, many items eligible for funding in previous grant guidelines will no longer be funded.

Non-Vendor Supported (NVS) - Replacement of CHE during the deployment period, to include hardware and software, that is no longer supported by the vendor to enable primary PSAPs to maintain current service levels. Only NVS CHE and related services will be funded. Failure of a reseller or partner to support hardware/software and/or service does not meet this definition unless there are no other options for support available. Supporting documentation from the vendor must be included with the funding or amendment request as a requirement for funding.

Physical Consolidation – The physical consolidation of two or more primary PSAPs into a single physically combined primary PSAP with an integrated management structure established by MOUs that serves the same constituent population previously served by the independent primary PSAPs. In addition, all parties must benefit directly from the consolidation activities
implemented with a grant award. CHE as defined in the guidelines is an allowable project for a physical consolidation project.

Primary Public Safety Answering Point (PSAP) – A PSAP that receives the initial wireless E9-1-1 call as recognized by the Virginia 9-1-1 Services Board as eligible to receive wireless funding.

Proposal Acceptance Letter (PAL) – A document completed by a PSAP that confirms the acceptance of information contained in the MP, the PSAP’s intent to deploy NG9-1-1 and execute a contract vehicle with a NG9-1-1 solutions provider within a specific period of time, and identifies a PSAP’s preference for Board payment of eligible NG9-1-1 expenses to be incurred.

Public Safety Answering Point (PSAP) – A facility equipped and staffed on a 24-hour basis to receive and process E9-1-1 calls or that intends to receive and process E9-1-1 calls and has notified commercial mobile radio service (CMRS) providers in its jurisdiction of its intention to receive and process such calls.

Recurring 9-1-1 Costs – Periodic costs beyond the initial purchase of 9-1-1 equipment and/or services. With the purchase of 9-1-1 equipment and services, five years of prepaid service is allowable, but the period of cost recovery is limited to the grant award period.

Secondary PSAPs – A PSAP to which 9-1-1 calls are transferred from a primary PSAP. Secondary PSAPs currently served by a selective router pair are eligible to participate in the NG9-1-1 Migration Program, but are not eligible to participate in the PEP or receive funding for CHE or consolidations.

Session Initiation Protocol (SIP) - A protocol specified by the IETF (RFC3261) that defines a method for establishing multimedia sessions over the Internet. Used as the call signaling protocol in VoIP, NENA i2 and NENA i3.

Shared Services Project – Project in which the provisioning and use of 9-1-1 equipment and/or services occurs between two or more PSAPs in order to “share” the funding and resourcing of equipment and software used to process 9-1-1 calls. The purchase of hardware and software is included. Projects are not considered as shared services if they consist solely of a network solution that links together individual systems.

Supplanting – Grant funds are to be used to supplement, not replace, the portion of the local governments’ budgets that pertain to PSAPs. Supplanting occurs when general funds are replaced.

Transitional SIP – This solution uses an IP (SIP) connection to get the voice call directly into the PSAP’s CHE.
Wireless E-911 Fund – A dedicated fund consisting of all moneys collected pursuant to the Wireless E-911 surcharge, as well as any additional funds otherwise allocated or donated to the Wireless E-911 Fund.
NG9-1-1 MIGRATION PROGRAM

Eligibility

Any Virginia primary PSAP and secondary PSAP currently served by a selective router pair are eligible to apply for and receive funding from the NG9-1-1 Migration Program.

Funding Amounts

Any primary PSAP and secondary PSAP currently served by a selective router pair are eligible for full funding during the NG9-1-1 deployment period for items necessary for call routing transitioning to an ESInet. These items will be identified in each primary PSAP’s and secondary PSAP’s MP. There is no required local match.

If during the funding award period a primary PSAP will be involved in a consolidation project and/or has CHE that becomes NVS, the PSAP would be eligible for funding for these projects up to the following amounts:

- $200,000 per PSAP participating in a shared services CHE project
- $150,000 for an individual PSAP CHE project
- $500,000 per physical consolidation project

Secondary PSAPs are not eligible for funding for CHE replacement or consolidation projects.

Shared services projects among PSAPs are strongly encouraged. All jurisdictions participating must be identified in a multi-jurisdictional agreement (MJA) signed by all parties. Shared services projects require that one eligible primary PSAP act as the “host” for the initiative. The “host” will be the fiscal agent responsible for fulfilling all requirements such as reports, control of and accounting for funds, and distribution and control of equipment purchased.

Similar to a shared services project, one of the primary PSAPs participating in a physical consolidation must act as the “host” and is responsible for fulfilling the same requirements. Additional funding may be available for consolidations if substantial NG9-1-1 migration cost savings can be demonstrated. Primary PSAPs interested in obtaining funding for a physical consolidation project must satisfy two prerequisites before receiving funding:

- First, the localities that govern the PSAPs involved in this physical consolidation must sign a MOU in support of a physical consolidation.
Second, a feasibility study must be completed by the localities using local funds.

**Funding Award Period**

Funding awards are for three years from the date approved by the Board. All funds must be expended by the end of the award period unless an extension request is approved by the Board.

**Funding Cycle and Application**

The funding cycle for the NG9-1-1 Migration Program begins on July 1, 2018 and will remain open throughout the NG9-1-1 deployment period. A funding application consists of the final version of the MP prepared by ISP staff and a completed PAL.

**How to Apply/Deadline**

Funding applications will be reviewed and approved on an ongoing basis throughout the NG9-1-1 deployment period. Applications are due by 5 pm no later than 45 calendar days in advance of a scheduled Board meeting. Applications must be submitted electronically to the PSAP Grant Program mailbox (psapgrants@vita.virginia.gov) with required supporting documentation.

**Migration Proposal (MP)**

The MP is being developed for each locality (or groups of localities if served by a consolidated PSAP to provide information about the AT&T NG9-1-1 solution, prerequisite work needed within the PSAP, and expected costs and funding provided by the Board. The goal of this document is to provide each PSAP/locality with all of the information needed to evaluate the AT&T solution and determine whether it will meet local needs.

ISP staff will prepare a proposal document for each PSAP that includes necessary NG9-1-1 implementation steps and recommended participants, a timeline for completing these steps, and related non-recurring and recurring costs to achieve an outcome of i3 geospatial 9-1-1 call routing. This proposal also provides an anticipated NG9-1-1 deployment schedule and anticipated funding.

Although the MP provides a path to achieve geo-spatial routing, regional needs may necessitate that a PSAP transition to NG9-1-1 before this
An implementation step, such as a CHE upgrade, may delay a PSAP’s NG9-1-1 deployment date. To minimize legacy 9-1-1 service provider transition costs, all PSAPs currently served by a selective router pair need to transition within a short time period. In this case, a legacy network gateway (LNG) can be set up as a transitional step. This would enable all PSAPs to transition at the same time and for the CHE upgrade to take place afterwards.

Only items that are specifically identified in the MP as necessary to deploy NG9-1-1 would be eligible for funding. As a result, many items eligible for funding in previous grant guidelines would no longer be funded. In addition, cash flow will be closely monitored to maintain the statewide NG9-1-1 deployment schedule established by the Board. As a result, some special construction to increase redundancy and diversity may need to be addressed after a PSAP transitions to NG9-1-1, as long as service is not degraded.

Proposal Acceptance Letter (PAL)

The PAL confirms the PSAP’s acceptance of information contained in the MP and its intent to deploy NG9-1-1, as well as the following information:

- PSAP’s decision for a NG9-1-1 solution provider
- Interoperability issues related to NG9-1-1 solution provider decision
- Need for a transitional step with current NG9-1-1 deployment schedule
- Delay in increasing redundancy or diversity
- Use of billing agreements

By completing the PAL, a PSAP confirms they understand that a contract vehicle with a NG9-1-1 solutions provider needs to be executed within 90 days of the Board approving a funding request.

Funding Award Amendments

A PSAP can submit a funding award amendment request for the following reasons:

- An end-of-life notice for CHE is received by the PSAP with an effective date that occurs during the three year NG9-1-1 funding award period
- A previously unidentified issue impacting NG9-1-1 readiness

Funding amounts for CHE are provided in the Funding Amount section on page 10. ISP staff can process an award amendment for items with a non-material cost of less than $5,000. Items with a material cost of more than $5,000 would need to be approved by the Board.
Payment Request Process

The PSAP Grant Program has a reimbursement cash disbursement policy. Payment requests may be submitted by award recipients after the award period begins and no later than 45 calendar days after the award period ends, (or next business day if the 45th day falls on a weekend or holiday) or as adjusted by any award extensions. Only invoices are acceptable forms of documentation and must reflect dates that fall within the actual award period. Payment requests must be sent electronically to the PSAP Grant Program mailbox (psapgrants@vita.virginia.gov) on the appropriate form, along with an invoice.

Award recipients must wait until services are performed or goods are received, which must occur during the actual award period, and the corresponding invoices are received and/or paid in order to recover costs. For projects involving milestone payments, invoices may be submitted in accordance with executed contracts. A copy of the payment terms section of an executed contract that identifies the milestones must be included with the payment request. If a participant in a multi-jurisdictional project, other than the fiscal agent, is seeking reimbursement for an award-related expense, the participant must have the written approval of the fiscal agent in order for the reimbursement request to be processed.

Payment requests received without all required invoices will be considered null submissions 30 calendar days after notification and non-receipt of required documentation. In addition, payment requests will be held until all required progress reports, or other Board required information, are received.

Progress Reports

PSAPs will be required to complete periodic progress reports. The Board will determine this process and ISP staff will advise award recipients.

Award Extension Requests

The Board will determine the process for PSAPs to request an award extension and ISP staff will advise award recipients.

Award Closure

The Board will determine the process for PSAPs to close their award and ISP staff will advise award recipients.
PSAP EDUCATION PROGRAM

Eligibility

Any Virginia primary PSAP is eligible to apply for and receive funding from the FY 20 PEP. Secondary PSAPs are not eligible for PEP funding. Grant funds are to be used to supplement the portion of local governments’ budgets, not to supplant funds.

Funding Amounts

Approved grants in this program will receive funding from the PSAP Grant Program before any other funding priority. PSAPs have two funding options:

- $3,000 per primary PSAP for individual PEP requests
- $4,000 per primary PSAP for multi-jurisdictional PEP requests

Multi-jurisdictional PSAP education or training projects require that one eligible primary PSAP act as the “host” for the initiative. The “host” will be the fiscal agent responsible for fulfilling all grant requirements. All jurisdictions participating must be identified in a MJA signed by all parties.

PSAPs may receive an award for an individual PEP grant and participate in a multi-jurisdictional PEP grant in the FY 20 grant cycle. However, the multi-jurisdictional PEP grant award cannot be used to supplement an individual PEP grant award that has been exhausted during the grant award period.

Grant Award Period

The FY 20 PEP is an annual grant program with an award period that runs consistent with the Commonwealth of Virginia’s fiscal year. The twelve month grant award period begins on July 1, 2019 and ends on June 30, 2020. All grant funds must be expended by the end of the grant award period. PEP grants are not eligible for extensions. The Board will approve the PEP awards at their January 2019 meeting.

Grant Cycle and Application

The FY 20 grant cycle for the PEP begins on July 1, 2018 and will remain open until 5 pm on October 1, 2018. PEP grant applications are available from VITA’s ISP website.
Each PEP application must include the following:

- Description of how the education/training is 9-1-1/GIS specific and how this will benefit the employee(s) and/or PSAP(s)
- Breakdown of the funding allocation of the 9-1-1/GIS education/training opportunities
- Evaluation plan that describes how the PSAP will measure the extent to which employees of the grantee PSAPs received value from the education/training

**How to Apply/Deadline**

The FY 20 PEP application cycle begins on July 1, 2018. PEP applications must be submitted electronically to the PSAP Grant Program mailbox (psapgrants@vita.virginia.gov) using the appropriate form and with required supporting documentation.

**Program Concept**

The PEP funds registration/training fees, lodging, travel assistance (for VA APCO, VA NENA, and VAMLIS state conferences only), M & IE (meals and incidental expenses for all other conferences and training opportunities), required training course material, and certifications. Reimbursement for travel assistance and M & IE requires an overnight stay. Reimbursement information is available from VITA’s ISP website. Reimbursement will only be made at the posted rate effective on the date of the training, plus applicable state and occupancy taxes based on the Commonwealth of Virginia Travel Guidelines.

**Program Goals and Objectives**

The PEP is designed so that all primary PSAPs will take advantage of opportunities to foster and enhance consistent knowledge and awareness of current and advancing 9-1-1 and GIS public safety communications standards, issues, procedures, practices, technologies and other relevant matters.

**Payment Request Process**

The PEP uses a cost recovery method of funding. In the Comprehensive Project Description section of the PEP grant application, the applicant will provide a reasonable estimate of the funds to be used. The grantee will pay
the costs of all allowable expenses. Within 30 calendar days of the end of the education/training event (or next business day if the 30th day falls on a weekend or holiday), the grantee must submit hotel receipts, conference receipts, online education/training payment documentation (including a dated certificate of completion for any online training received), and/or a detailed invoice for all allowable expenses in association with an education/training opportunity. Receipts are not required for meal reimbursement. Registration documentation is not an acceptable form of documentation. If the request for reimbursement is not submitted within the allotted 30 calendar days, the Board has determined that reimbursement cannot be provided.

PEP grant payment requests received without all required receipts will be considered null submissions after 30 calendar days of notification and non-receipt of required documentation. In addition, grant payment requests will be held until all progress reports, or other Board required information, are received.
APPENDIX

APPENDIX A: INTEROPERABILITY REQUIREMENTS

Interoperable Definition for Commonwealth of Virginia NG9-1-1 ESInet

Below is a summary of requirements for a NG9-1-1 Solutions provider other than AT & T to be considered interoperable with the Fairfax County NG9-1-1 ESInet (“Commonwealth’s ESInet”) solution.

- Jurisdiction’s ESInet solution will be responsible to ensure integrated text, voice, and data interoperability with the state’s NG9-1-1 solution. This includes, but is not limited to, the following requirements:
  - Establishing redundant, diverse ESInet and Next Generation Core Services (NGCS) connectivity to the Commonwealth’s ESInet at locations defined by VITA.
  - Providing NENA standards based border control function (BCF) at the jurisdiction’s NG9-1-1 provider’s edge.
  - Ensuring NOC to NOC communications SOPs are established between the jurisdiction and the Commonwealth ESInet.
  - Lab-to-lab testing in non-live environment with current production software releases to verify interoperability.
  - Support Transitional paths to NG9-1-1 to allow transfer of calls to any neighboring jurisdiction (support legacy call transfer to an ESInet [via interworking IPSR\textsuperscript{2} to i3\textsuperscript{3} protocols] and support inbound ESInet calls to a legacy PSAP [via interworking i3 to IPSR protocols]).
  - Support SIP interconnection with use of SIP call delivery and use of i3 protocols including but not limited to PIDF-LO, LoST, HELD, GET, SIP REFER, Subscribe/Notify messaging, and EIDD as defined by the Commonwealth’s NGCS provider’s specification.
  - Provide an ESInet solution inclusive of pricing for text-to-911 Text Control Center services. This solution must provide the ability to transfer texts received initially at the first PSAP to any other Commonwealth PSAP, regardless of NG9-1-1 ESInet/NGCS services provider.

\textsuperscript{1} ESInet (Emergency Services IP Network) – a managed IP network used for emergency services communications that can be shared by all agencies. In the context of this definition, the Next Generation Core Services (NGCS) that operate on the ESInet are included.

\textsuperscript{2} IPSR replaces the functions of legacy selective routers by routing 9-1-1 calls via Internet Protocol (IP) to a PSAP using existing mechanisms (e.g., ANI, p-ANI, ESRK) and converts the call to SIP signaling.

\textsuperscript{3} I3 is shorthand terminology for the ESInet and NGCS and systems that are in conformance with NENA-STA-010.