



The California Chapter of the National Emergency Number Association

Assembly Member Das Williams –District 37
101 W. Anapamu Street -Suite A
Santa Barbara, CA 93101

RE: Assembly Bill 1564

Assembly Member Williams:

The California Chapter of the National Emergency Number Association (CALNENA) membership has reviewed AB1564 and would like to thank you for your support and advocacy of issues that impact 9-1-1 operations and its response to the public's call for help.

AB1564 introduces a requirement of the State Office of Emergency Services – Public Safety Communications Division to collaborate with relevant stakeholders to establish the most efficient routing of 911 calls for the benefit of the public's safety. In review of the current language, CALNENA's position is NEUTRAL. While CALNENA agrees with the premise of the Bill and its positive steps towards regulating the review of routing 9-1-1 calls in the State of California, we feel there are several key elements missing that would maximize accountability of the proposed process. CALNENA supports:

- 1) The creation of a "Standards" document that provides guidelines to PSAP's and all stakeholders in the process. The document, at minimum, identifies: triggers that prompt review of a sector assignment, options that stakeholders have, a time element for communication, a process for submitting change, expected outcomes from the proposed change and process and timeline for post-change evaluation. This document is critical for today's staff working with these issues and would be an invaluable resource for staff in the future. The document should also describe how outcomes would be measured now and in the future as the cellular system evolves.
- 2) The standards document should include acceptable percentage thresholds for compliance towards optimization goals. This will facilitate a periodic (annual) report to be distributed to the State 911 Advisory Board. The report should also include the previous year's performance toward reaching said goals.
- 3) Annual review of the statewide system may be too aggressive. Those agencies that participated in the 2015 review conducted by the State advised it was a tremendous amount of work in a short period of time to render results. Perhaps every two years with a strategic plan on what region is to be reviewed over said period.
- 4) Financial penalties of the carriers should be invoked if change isn't made within a specified time perimeter. Currently, there are no safeguards or oversight of the change management process.

- 5) A third-party audit should be conducted every two-three years to ensure compliance of all performance aspects of this program.
- 6) A communications software platform should be established that allows stakeholders to see and participate in the workflow of proposed change.
- 7) The use of the word 'alternate' in the proposed bill language creates confusion as 'alternate' (911 Centers) as defined in the State 911 Operations Manual is identified as: Alternate Answer – A feature that allows California 9-1-1 Network calls to be redirected to a preselected alternate PSAP at a different location in the event of an equipment or network failure. The alternate PSAP would be advised that calls need to be redirected to their PSAP and the alternate PSAP would then activate the feature.

CALNENA applauds the State OES-Public Safety Communications Branch efforts to date. However, we feel the creation of an official program that is well detailed and measured would be in the best interest of public safety agencies and public they serve.

Should changes in the Bill reflect any or all elements identified above, CALNENA will review the changes and reconsider our position. We would be more than happy to meet with you to discuss further.

Assembly Member Williams, please accept our collective thanks for your attention towards issues that are and have been identified in the wireless 9-1-1 system. We very much appreciate legislative support that facilitates measured progress in this area.

Sincerely,



Jaime D. Young, President
National Emergency Number Association
California Chapter