



Alachua County Department of Fire/Rescue Services Communications Technology Bureau

Susan Nelson, ENP, CMP, Bureau Chief

Board of County Commissioners

March 26, 2008

Ms. Ann Cole, Director
Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, Florida 32399-0850

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Re: Docket No. 080089, Intrado Petition for Declaratory Statement

Dear Ms. Cole:

On February 8, 2008, Intrado Communications Inc. ("Intrado") filed its petition for declaratory statement requesting that the Florida Public Service Commission ("Commission") address whether Intrado or a 911 Public Safety Answering Point ("PSAP") would bear any obligation to an incumbent local exchange telecommunications carrier ("ILEC") to pay an ILEC's 911 tariff charges when the PSAP has selected Intrado to provide the PSAP with its 911 services. On March 14, 2008, Intrado filed its amended petition substantively raising the same issue as the February 8th petition, but rephrasing the specific questions this Commission should address. As the Communications Bureau Chief/E-911 Coordinator for Alachua County, I strongly urge the Commission to consider the issues raised by Intrado and find that an ILEC may not charge Intrado and/or the PSAP for any ILEC 911 tariff charges, untariffed charges, or bundled charges for terminated 911 services.

Since the first deployment of emergency 911 services in the 1960s, the technology to receive and respond to 911-dialed calls has evolved from a wireline ILEC telephone network perspective. Today, traditional landline telephone callers rely upon a system that can effectively route calls to the appropriate PSAP and provide location data that is highly accurate and secure.

Over the last ten years, the demands upon the 911 system have grown and changed significantly because of the widespread use of wireless telephones and the increasing acceptance of new calling technologies such voice over Internet protocol ("VoIP"). While the Federal Communications Commission ("FCC") has mandated certain technological obligations on the wireless and VoIP carriers, it has been up to the local PSAPs to deploy the necessary equipment that can receive and process these calls. Our county government, along with additional funding opportunities made available through the Florida Legislature, has committed significant resources to be able to handle these non-traditional, non-ILEC network calls, but it is going to take the deployment of next generation network services to enable PSAPs to be able to receive, process, and respond to these callers.

The issue with wireless and VoIP calls is especially acute. Under the best of circumstances location accuracy is far less accurate than if the call originated at a traditional landline phone. In addition, consumers increasingly desire the ability to text message a PSAP or to send real time photographs

P.O. Box 548 ■ Gainesville, Florida 32602 ■ Tel. (352) 338-7361 ■ Fax (352) 374-5298
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Page 2

and video during an emergency situation, but PSAPs are unable to receive these messages using ILEC network services.

Outside the wireless and VoIP environment, PSAPs face other challenges. During a hurricane, for example, the ability to seamlessly transfer an entire 911 center's calls to another 911 center would enable people to continue to reach first responders. In addition, it is not uncommon during a single event, such as a major traffic accident or other large event, for a 911 center to become overloaded with calls associated with that event, which may result in callers elsewhere in the county with other needs being blocked. The ability to "on the fly" reconfigure the 911 network to reroute calls originating from a specific geographic area that is overloading the system so that other callers can get through would be a life saving benefit to everyone. The network services that would enable this functionality can only be done through the deployment of next generation network services.

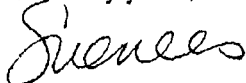
While as stewards of the 911 system, PSAP administrators have been moving forward with plans to deploy next generation network services such as are being offered by Intrado, we are constrained by some of the information we are receiving from the ILECs regarding alleged continuing obligations once the ILEC is no longer the network services provider. For example, as is related in Intrado's petition for declaratory statement, we have been told that if we choose Intrado as our network services carrier that Intrado and/or the PSAP may still be subject to certain ILEC tariff charges, or that the ILEC may create new tariff or other rate elements, or that other services we receive may be bundled with services we no longer receive resulting in the payment for unnecessary services.

To be sure, I want to be clear that we do not have any issue with ILEC charges associated with services or rates for which there is a continuing legal duty, nor are we contesting any previously contractual obligations for early termination or liquidated damages. These types of contractual obligations are not the subject of the declaratory statement request.

The consumers of Florida require a more robust emergency 911 system that serves all callers, whether from a traditional landline phone, a wireless phone, or over a VoIP network. Only through the deployment of next generation 911 services such as are being offered by Intrado will our county be able to receive and effectively serve 911 callers. However, in order to make this technology transition, we must be free from any legacy ILEC charges other than those for which we have clear, specific obligations.

I strongly urge you to issue the requested declaratory statement. Feel free to contact me if there are any questions or the Commission needs additional information from us. Thank you for your consideration.

Sincerely yours,



Susan Nelson, ENP, CPM
Communications Bureau Chief, Alachua County Fire Rescue

cc: Chief Will Gray May, Jr., Director of Emergency Services
Rick Mills, Alachua County Legislative Liaison



John Davenport
Sheriff of Charlotte County

7474 Utilities Road
Punta Gorda, Florida 33982
(941) 639-2101

March 25, 2008

Ms. Ann Cole, Director
Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, Florida 32399-0850

Re: Docket No. 080089, Intrado Petition for Declaratory Statement

Dear Ms. Cole,

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Since the first deployment of emergency 911 services in the 1960s, the technology to receive and respond to 911-dialed calls has evolved from a wireline ILEC telephone network perspective. Today, traditional landline telephone callers rely upon a system that can effectively route calls to the appropriate PSAP and provide location data that is highly accurate and secure.

Over the last ten years, the demands upon the 911 system have grown and changed significantly because of the widespread use of wireless telephones and the increasing acceptance of new calling technologies such as voice over Internet protocol ("VoIP"). While the Federal Communications Commission ("FCC") has mandated certain technological obligations on the wireless and VoIP carriers, it has been up to the local PSAPs to deploy the necessary equipment that can receive and process these calls. Our county government, along with additional funding opportunities made available through the Florida Legislature, has committed significant resources to be able to handle these non-traditional, non-ILEC network calls, but it is going to take the deployment of next generation network services to enable PSAPs to be able to receive, process, and respond to these callers.

The issue with wireless and VoIP calls is especially acute. Under the best of circumstances location accuracy is far less accurate than if the call originated at a traditional landline phone. In addition, consumers increasingly desire the ability to text message a PSAP or to send real time photographs and video during an emergency situation, but PSAPs are unable to receive these messages using ILEC network services.

Outside the wireless and VoIP environment, PSAPs face other challenges. During a hurricane, for example, the ability to seamlessly transfer an entire 911 center's calls to another 911 center would enable people to continue to reach first responders. In addition, it is not uncommon during a single event, such as a major traffic accident or other large event, for a 911 center to become overloaded with calls associated with that event, which may result in callers elsewhere in the county with other needs being blocked. The ability to "on the fly" reconfigure the 911 network to reroute calls originating from a specific geographic area that is overloading the system so that other callers can get through would be a life saving benefit to everyone. The network services that would enable this functionality can only be done through the deployment of next generation network services.

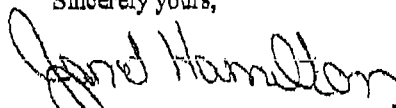
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I strongly urge you to issue the requested declaratory statement. Feel free to contact me if there are any questions or the Commission needs additional information from us. Thank you for your consideration.

Sincerely yours,



Janet Hamilton
Charlotte County E911 Administrator

cc: Parties of Record

Robert L. Crowder
Sheriff



Office of the Sheriff
Martin County, Florida

(772) 220-7000

www.sheriff.martin.fl.us

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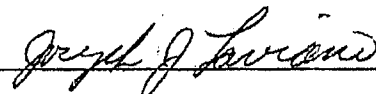
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Sincerely,
Robert L. Crowder, Sheriff

by: 
Joseph J. Laviano, ENP
Martin County E-911 Manager/E-911 Coordinator

cc: Parties of Record



SARASOTA COUNTY

"Dedicated to Quality Service"

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March 25, 2008
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CONSUMER

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Sincerely yours,



William K. Stevens ENP
911 Coordinator
Sarasota County Public Safety Communications
1660 Ringling Blvd.
Sarasota, Fl. 34236

cc: Parties of Record