

Summary:

This draft bill creates an “emergency communications system” that includes the receipt of an emergency call for an “emergency call system” at a Public Safety Answering Point (PSAP). The emergency call is then sent to an emergency dispatch center that requests a response from an emergency response service. The dispatch center is part of an “emergency dispatch system” ensuring the call reaches its destination. The dispatch center and PSAP may be located at the same facility. Together the emergency call system and the emergency dispatch system are components of the emergency communications system.

Responsibility for the development of this new emergency dispatch system is placed within the Enhanced 911 Board. An advisory committee is formed to help guide the Enhanced 911 Board in developing the system. Three phases of transition have been drafted to include a data collection phase, a design phase and an implementation phase. The goal is to have a fully functional emergency communication system on or before July 1, 2026. \$11,000,000 has been identified to help develop this system. The language in this draft provides the basic structure to advance this initiative.

Properly identifying the terms used in this draft is important in creating an understanding as to how this function is to be implemented and operated. Second to defining terms is to use language that is consistent throughout the document. Finally, creating implementation tasks that are realistic with proper resources are crucial to success.

I offer the following for consideration.

The term “Dispatch Center” needs to be expanded. A dispatch center should be approved by the board and it should be clear that it needs to include more than one municipality. The Board should also ensure those municipalities enter into an agreement with the dispatch center for services. Dispatch services should also be defined (see below under definition of emergency dispatch services). It is important to note the use of the term “emergency” is a distinctive term intended to narrow the scope of public safety dispatching. It does not mean the dispatch center is responsible for administrative or proactive calls for service unless agreed upon by all parties. Any additional dispatching services should be paid for by the requesting municipality. The State should only subsidize the dispatch center the costs for emergency calls. The cost model task is already part of the design phase on page 26 line 17.

The following is draft definition language followed by a sample new definition.

Page 5, line 12” Dispatch Center” means a Facility that provides regional emergency dispatch services and may be a public safety answering point. (Definition should be expanded, see below.)

Sample Definition: Dispatch Center(s) means a facility, approved by the Board, operated by or on behalf of 2 or more municipalities or governmental bodies, or combination thereof, that enters into an agreement for the establishment of regional emergency dispatch services for all such municipalities or governmental bodies in that region, including, but not limited to police, fire protection, and emergency medical services dispatch or other emergency provider approved by the Board.

Page 6, line 3 (10) “Emergency Communication System” or “system” means a **[resilient statewide]** system that comprises an *integrated* emergency call system and an emergency dispatch system. **Resilient statewide should be added.**

Is this intended to mean the state will only set up PSAPS’s, those facilities that receive 911 calls and dispatch? I think the intention is to allow for a dispatch center to operate independently of being a PSAP if they so choose. If so, then the term “**an integrated**” **should be removed and replaced with “both the” before emergency call system.** [Note: on page 10 Line 17 a differentiation is made between PSAP and dispatch centers.] Statewide should be added to make sure it is explicitly understood it is a statewide system.

Throughout the “Findings and Intent” section of 23-0775 draft 1.1 the term “dispatch” and “emergency dispatch system” are used. In Sec.2 (a) it states, A comprehensive and effective emergency communications system comprises both an emergency call system and an emergency dispatch system. Again, on page 6, line 3 in the definition of “Emergency Communications System” it refers to both an emergency call system and an emergency dispatch system. Dispatch is a term used throughout the beginning of the draft along with the term dispatch services [page 5 line 13]. Therefore, as mentioned previously dispatch should be defined. The definition can be captured in a new definition for Emergency Dispatch Services.

Sample Definition: “Emergency Dispatch Services” as used in this chapter means the sending of and assistance to an emergency response service provider, police, fire, emergency medical services or other designated service to an emergency call and incident.

This definition is meant to include all communications with an emergency response service provider during an emergency call and incident. This definition is intended to identify the State’s dispatching responsibility and what the State will pay for.

The term “Emergency Dispatch System” (see below) should be defined in a way that says it is a statewide and resilient system.

Page 6, line 6 (11) “Emergency dispatch system” means the system for receiving calls from the Enhanced 911 system and requesting emergency response services from police, fire, emergency medical services, public safety service, or other designated provider of emergency response services. **Change the definition to include a regional system and a resilient statewide emergency communications system.**

Suggested Definition: “Emergency dispatch system” means the regional system for receiving calls from the Enhanced 911 system and requesting and assisting with emergency response services from police, fire, emergency medical services, public safety service, or other designated provider of emergency response services through a resilient statewide emergency communications system.

Page 11 line 4 (4) Standards and procedures to ensure system and database security, **resiliency**, and **interoperability**. [Terms should be defined]

Sample Definition: “Communications Resiliency” means a network that includes route diversity, redundancy and has restorative measures that allows it to withstand damage, thereby minimizing the likelihood of a service outage.

Sample Definition:” Interoperability” means the ability for anyone, when responding during emergencies and natural disasters, to talk with whomever they need to, whenever they need to, and when properly authorized.

Page 13 line 11(5) costs attributable to demonstration projects designed to enhance the delivery of emergency 911 and other emergency services, including dispatch services. [another example of why dispatch services need to be defined]

Section 7053 “Board; Responsibilities and Powers”

Is the lack of powers relative to dispatching omitted by design?

Is the lack of a regional governance model omitted by design? I recommend that regional governance be put in place and recommend the following.

- (a) A governance structure that must be by written agreement, signed by all communities involved and approved by the Board for the Emergency Dispatch Center(s). This agreement must include but not be limited to;**
- a. establishing a board to oversee or advise the number of communities and public safety agencies served by the center, and**
 - b. the location of the center(s) including the construction or siting of a new center, if necessary, and**
 - c. administration, and**
 - d. operation of the center, and**
 - e. finances of the center, and**
 - f. provide the board with the powers, and duties, whether authoritative or advisory, to maintain an emergency dispatch center, and**
 - g. the ownership of the equipment and how the equipment is disposed upon the termination of the facility as an emergency dispatch center, and**
 - h. the process for a community or emergency response service to leave the emergency dispatch center.**

Page 19 4 Line emergency communications database. I am not sure if this needs to be a new definition or if the definition for database [Page 4 line 19] covers it. I do not think it does and the question is best answered by the E 911 staff.

Page 22 Line 3 remove “statewide’ or add “**statewide**” to the definition of emergency communications system (which I have suggested in this document.). `The term statewide appears again on page 24 line 16. Keep the language consistent. If the term “statewide” is included in the definition of emergency communications then statewide in these lines can be kept or removed.

Page 25 Line 1 says the Board shall perform. Is this meant to be the Board or Committee?

Page 26 Line 1 (2) Design. The Board shall design an equitably financed, regional dispatch system that is part of a broader statewide emergency communications system. Again, the term regional is used and statewide is used. These terms should be mentioned in the definition section under the appropriate language [Emergency communications system, which I have included in this document].

Page 26 Line 10 (D) shall develop **[standards]** for **[dispatch centers]** continuity of operations plan that encompasses failover procedures and other system **[resiliency measures]** ~~redundancies~~ to ensure the continuous performance of mission critical operations.

The dispatch centers will be operated by either state departments or local departments. Therefore, whomever is operating the centers should be responsible for enacting continuity of operation plans (COOP) that are relevant to their area based upon Board approved standards. **Add the term standards, dispatch centers and resiliency measures.** Resiliency is a term that better describes the need to maintain communication services. See definition recommendation.

Page 27 Line 8 insert **[agrees to meet]** the design standards..... By inserting the term “agrees” you are allowing a potential new dispatch center to start operating, if necessary, or at least to make expenditures necessary to begin operations. As long as they commit to adhering to standards or protocols that may not be in place before July 1, 2024 they can begin establishing the necessary items to establish a center. I think this is an ambitious target date, but I understand the intent and support the desire to move forward with a pilot site.

Page 27 Line 12 remove the term “integrated.”

Page 29 Line 3 Is “regional communications network” a stated purpose within the Congressionally Directed Spending language? If so, consideration should be given to adding the term network into one of the definitions. Perhaps in the definition of emergency communications system the term network could be added.