

Public Comment/Topic	911 Board Correction/Comment
<p>"The Board has no IT expertise"</p>	<p>The Enhanced 911 Board itself is made up of statutorily defined members (30 VSA 7052). The Board has the authority to hire an Executive Director who, with the approval of the Board, can hire employees - which currently include two IT staff members. The current IT Manager is highly qualified and has been on staff for 13 years, as IT Manager since 2016. He is responsible for technical oversight and management of the 911 system and the 911 system provider. The IT Manager has, from time to time, engaged with additional experts at the Agency of Digital Services for support or assistance with specific issues.</p>
<p>Inaccurate description of isolation and conflation of multiple issues under the heading of "isolation". Suggested all of the 200 or so outage reports since 2012 have been isolations.</p>	<p>In some areas of Vermont, when there is a temporary failure in a wireline telephone service provider's network, it can result in what is known as "isolation" in which the caller has dial tone, but cannot complete long distance calls or calls to 911. There have been 4 reports of isolation events in the each of the last two years. At the request of the 911 Board in March 2019, the Department of Public Service has petitioned the PUC to open a "workshop" on the issue of "isolation" to include scope, locations, and costs of mitigation.</p>
<p>FirstLight use of Huawei products as reported by V-tel</p>	<p>The 911 Board received certification on February 5, 2019 from INdigital and FirstLight that the proposed solution will not rely upon "any equipment or services defined in Public Law 115-232 ("NDAA") in section 889 (f) (3)" – which includes Huawei products. In addition, the contract includes a requirement for compliance with Vermont's Cybersecurity Directive 19-01, issued on February 15, 2019, which defines the state's requirements and restrictions related to the services and equipment identified as cybersecurity or other risks.</p>
<p>The Board has not completed its statutory requirements for rulemaking and hasn't updated any rules in 20 years.</p>	<p>The Board has in place several rules as required by statute: technical and operational standards; locatable addressing rule, and the individual privacy rule. The addressing standards associated with locatable addressing rule were updated in 2012 (the rule itself did not require updating); the technical and operational standards are currently under review; and a new rule - 911 Requirements for Enterprise Communications Systems - is scheduled for LCAR review on April 18, 2019. Also, many of the requirements in our technical and operational standards are now incorporated into the contract(s) with the 911 system provider.</p>
<p>The Indiana 911 outage should be cause for Vermont not to enter into a contract with INdigital.</p>	<p>The 911 Board was aware of the Indiana outage before it executed the contract. Discussions with Indiana authorities (911 director and state CIO) as well as with INdigital have occurred and the Board is confident the INdigital contract and system design will prevent such an outage in Vermont.</p>
<p>The Alabama statewide solution by INdigital is problematic (maybe due to it not be completed, yet?)</p>	<p>The Alabama 911 Director was consulted during reference checks about their experience with the Indigital solution in that state. No problems were reported. Vermont's CIO received a similar report from the Alabama CIO in a recent (April 2019) conversation. (New Hampshire also has a statewide INdigital solution in place for three years. No outages have occurred).</p>

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<p>Ms Neal said the state would be conducting testing on the system prior to system implementation. This should "scare" everyone.</p>	<p>The 911 Board staff (IT, database and training) will conduct user acceptance testing on the system following contractor's certification of the system as complete. In addition, the Board will contract with an outside vendor for an Independent Verification and Validation (IVV) of the system prior to system cutover. The contract requires that any deficiencies identified in the IVV be corrected before system cutover.</p>
<p>The Board should have hired a consultant to write our NG911 system RFP.</p>	<p>The Board has confidence in its NG911 system RFP which was based upon earlier versions of successful RFPs, was updated with input from various Board staff members and received review and approval from all required state entities. In addition, the consultant hired by the Board for the 2017 technical evaluation of the system (see below) includes these comments regarding the state's RFP for the current system in his report: <i>"This RFP represents the third iteration of a statewide NG9-1-1 System, making Vermont a pioneer in NG9-1-1 development. The RFP makes it clear that the Board staff and the PSAPs are sophisticated users of NG9-1-1 services. The Board and staff have established high expectations for 9-1-1 service.."</i></p>
<p>The Board hired a consultant (Joel McCamley from 911 Authority) to conduct an investigation into the 2016 system outages and did not recoup these costs from Consolidated.</p>	<p>The Board did hire 911 Authority in 2016, but not for an investigation into the 2016 outages. We knew the cause of those outages (a software problem that was corrected by the vendor). 911 Authority was hired to conduct a technical review and evaluation of the existing 911 system, its compliance with industry standards and best practices and its compliance with contractual requirements. Several recommendations related to contract language from this report have been incorporated into the newly executed contract with INdigital. The Board would not expect to recoup costs from the system provider for this type of consulting work.</p>
<p>The 911 Board's consultant (Joel McCamley from 911 Authority) was hired to conduct an Independent Review of the system RFP proposals and has a "propensity for recommending INdigital".</p>	<p>911 Authority was hired to develop technical assessments of each of the proposals. The assessments were then used by the evaluation team to develop its own recommendation. 911 Authority was not asked to provide a vendor recommendation and was not a "scoring" member of the evaluation team.</p>
<p>The Service Level Agreements (SLAs) with the current provider are inadequate and were not in place at the time of the 2016 outages</p>	<p>Agree! The adequacy of the service level agreements has been resolved in the new contract with INdigital. The new SLAs align with industry best practice and will better serve the state. The current contract clearly states that the SLAs are not effective until final acceptance. Final acceptance did not occur until 2017 due to vendor delays in meeting specific technical requirements of the Board.</p>
<p>The 911 Board has refused to allow the Public Utility Commission to investigate the contracted 911 system.</p>	<p>The 911 Board is responsible for the management of the contract with the 911 system provider...and...the PUC has not suggested they should/could/would/need to conduct an "investigation".</p>
<p>Selective router functionality described inaccurately.</p>	<p>The legacy selective routing functionality is now within the contracted NG911 system. The "tandems" used to provide selective router functionality (in the original system) but since approximately 2007 have served only as aggregation points for 911 traffic from all carriers. The new system will be significantly less reliant on these aggregation points as new points of interconnection will be defined.</p>