



The Honorable Deborah A.P. Hersman
Chairman, National Transportation Safety Board
490 L'Enfant Plaza SW
Washington, DC 20594

Department of Defense

Office of the Assistant
Secretary of Defense for
Health Affairs

In reference to: H-09-4

**Department of
Homeland Security**

Office of the Assistant
Secretary for Health
Affairs/Chief Medical Officer
U.S. Fire Administration

Dear Chairman Hersman:

In January of 2012, the Federal Interagency Committee on Emergency Medical Services (FICEMS) received a letter asking for additional work on Safety Recommendation H-09-4. This recommendation was issued to FICEMS on May 29, 2009, as a result of the NTSB's investigation of the January 6, 2008, motorcoach rollover crash near Mexican Hat, Utah.

**Department of Health &
Human Services**

Office of the Assistant
Secretary for
Preparedness and Response

H-09-4

Indian Health Service
Centers for Disease
Control and Prevention

Health Resources and
Services Administration
Centers for Medicare &
Medicaid Services

Develop a plan that can be used by the States and public safety answering points to pursue funding for enhancements of wireless communications coverage that can facilitate prompt accident notification and emergency response along high risk rural roads, as identified under SAFETEA-LU criteria, and along rural roads having substantial bus traffic.

**Department of
Transportation**

National Highway Traffic
Safety Administration

Federal staff supporting the FICEMS met with NTSB staff and discussed the original safety recommendation, the initial FICEMS response submitted to NTSB in February of 2011, the NTSB's request for additional work, and the issues surrounding funding emergency communications in rural and remote areas. Based on that discussion, FICEMS is providing the following additional information to NTSB as clarification and to ensure all possible actions have been taken to implement recommendation H-09-4.

**Federal Communications
Commission**

Public Safety and
Homeland Security Bureau

Background - Components of the Emergency Communications System

The emergency communications system is comprised of three distinct components that form one seamless system. The three components, as depicted below include caller access, 911, and emergency responders.

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Medical Services

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All components must function together, to meet the needs of the 911 caller. While all three components function as a single system, each component is the responsibility of distinct and separate entities at the state and local level.

- Caller access is provided by telecommunications service providers, such as Verizon and AT&T. These private companies are responsible for providing both the devices and the network that transmit 911 calls from the caller to the 911 Public Safety Answering Point (PSAP). While some requirements for delivering 911 calls are established by the Federal Communications Commission, local and statewide telephone service is regulated at the state and local levels by utilities commissions.
- 911 service is provided by approximately 6,000 PSAPs nationwide, and their operation is the responsibility of state and local governments whose constituents they serve. State and local governments are responsible for the infrastructure, operation and personnel within the PSAP.
- Emergency responder communication service is provided by the state and/or local government agency responsible for providing emergency response (law enforcement, fire rescue or emergency medical services). State and local government is responsible for providing the devices and the network transmitting communication between PSAP dispatchers and emergency responders.

Each specific entity is financially responsible for their respective portion of the emergency communication system. PSAPs and the state and local agencies that operate them do not have the authority to pursue funding for enhancements of wireless communications coverage. Such activities generally are within the purview of the state utilities commissions or comparable state entities. Pursuing funding for enhancements of wireless coverage is beyond the jurisdiction of PSAPs and it is beyond the purview of FICEMS to make recommendations or provide sample projects or case studies for PSAPs to pursue such funding.

It is our understanding that the telecommunications service providers, working with utilities commissions, must have a reasonable expectation of recouping costs for the installation and continued operation of networks to provide service. Especially in rural and remote areas as found in Mexican Hat, low population does not result in a sufficient

subscriber base to provide adequate financial support for the installation and continued operation of telecommunications services.

However, as alternatives to the PSAPs pursuing funding for enhancements of wireless communications coverage, FICEMS has previously proposed (February 2001) several strategies that could be used by the appropriate state or local government agency, to enhance emergency communications coverage. Potential funding sources included:

- Federal Highway Administration: Field Offices,
- U.S. Department of Agriculture – Rural Development Program (USDA RUS),
- Department of Homeland Security (DHS), and
- Motor Carrier Safety Assistance Program (MCSAP).

911 Funding

Funding for the operation of most local and state 911 systems has been provided by subscriber fees on telephone landline and wireless telephone services. Today, in compliance with state and/or local statute, 911 fees are typically collected monthly by telephone and wireless carriers and are remitted to the appropriate state/local 911 entities. With the continued evolution of the public's communication devices to digital, broadband-based technologies, additional communication devices (other than telephones) could be used to reach 911 and provide useful data (i.e., text messages, photos, video). Useful, actionable data could be transmitted to 911 and on to emergency responders – provided the 911 infrastructure is updated to receive digital data via Internet-based technologies – an infrastructure commonly referred to as Next Generation (NG) 911. As the public migrates to newer communication technology, 911 funding has become unstable, just as state and local governments are poised to build updated 911 infrastructure.

The National 911 Program, in coordination with 911 stakeholders, seeks to ensure a smooth, reliable and cost-effective transition to a nationwide NG911 system. The program seeks to coordinate the efforts of stakeholders, gather and share useful information on a variety of 911-related topics and administer a grant program specifically for the benefit of PSAPs. The NTSB report mentioned State 911 funding and the National 911 Program as potential sources of funding to enhance 911 systems. In discussing these 911 funding options with NTSB staff, FICEMS agreed to provide the following additional information on the activities of the National 911 Program related to funding:

911 Grant Program. In September 2009, the U.S. Department of Transportation's National Highway Traffic Safety Administration (NHTSA) and the U.S. Department of Commerce's National Telecommunications and Information Administration (NTIA) received a one-time appropriation and awarded more than \$40 million in grants to help 911 centers nationwide implement NG911 technologies, and enabling other features that could improve emergency response or enhance safety. The final report on this grant program has been completed and is included as an attachment.

Funding white paper. This document examines a number of issues related to 911 funding and presents current funding issues, funding needs, current and possible future fee structures, and current and potential future funding sources. The intent is to identify areas needing further assessment and analysis. The final white paper has been completed and is included as an attachment.

Blue Ribbon Panel on 911 Funding. In response to a recommendation made by an advisory body to the Federal Communications Commission (FCC), the National 911 Program, housed within the NHTSA Office of Emergency Medical Services (OEMS) funded a project which procured services of a contractor to provide specific expertise in economics, and apply that expertise to develop options for funding and oversight models of 911 systems that could be applied at local, and/or State levels of government. In addition to using its economic expertise, the contractor will utilize general stakeholder input from a Blue Ribbon Panel to help inform its analysis. The final deliverable of this project will be a report containing options for local, State and national 911 funding and oversight models, based on appropriate economic theories and principles. The final report is expected by March of 2014.

We appreciate the NTSB's recognition of the essential role of our Nation's 9-1-1 and EMS systems in reducing motor vehicle morbidity and mortality and the opportunity to respond to this recommendation. The FICEMS requests that recommendation H-09- receive a "Closed – Acceptable Action" rating. If you have any questions or need additional information, please direct them to Drew Dawson, Chair of the FICEMS Technical Working Group, at (202) 366-2705 or drew.dawson@dot.gov.

Sincerely,

Ed Gabriel, Chair
Federal Interagency Committee on Emergency Medical Services
Principal Deputy Assistant Secretary for Preparedness & Response
U.S. Department of Health and Human Services

Attachments:

E911 Grant Program: Final Report
Funding Next Generation 911: A White Paper