To: Ohio ESINet Steering Committee  
From: PSAP Operations Sub-committee  
Date: Thursday November 19, 2015  
RE: Sub-committee Report

At the October 15, 2015 meeting of the ESINet Steering Committee, direction was given to the PSAP Operations Sub-committee to research and make recommendations on two issues:

- Consider revisions to ORC 128.01P that would allow for virtual PSAPs within the definition.
- Develop language that would allow a PSAP that takes wireless calls, but does so without accepting funding, not to count against the county total number of PSAPs.

The sub-committee held meetings on October 26, 2015 and November 12, 2015 to consider these issues and now make the following recommendations.

1. Revision to ORC 128.01P that would allow for virtual PSAPs within the definition

The sub-committee made contact with two standard setting organizations in the 9-1-1 community and requested they provide their recommended definition of a virtual PSAP. The National Emergency Number Association provided the following recommended definition:

“An operational model directly enabled through NG9-1-1 features and/or network hosted PSAP equipment in which telecommunicators are geographically dispersed, rather than working from the same physical location. Remote access to the PSAP applications by the dispersed telecommunicators requires the appropriate network connections, security, and work station equipment at the remote location. Unified communications applications supporting voice, data, instant messaging, and video communications between telecommunicators may be used to enable the telecommunicators to work cooperatively from diverse locations. The virtual work place may be a logical combination of physical PSAPs, or an alternate work environment such as a satellite facility, or any combination of the above. Workers are connected and interoperate via IP connectivity.”

The sub-committee is concerned with the belief that the use of a single set of servers to accept 9-1-1 calls, whether via legacy telephone trunk lines or new IP delivery methods, then distribute them automatically to remote locations, constitutes a virtual PSAP. In examining the definition provided by NENA, there is more to the definition than just a single point of call distribution. The current definition of a PSAP includes the phrase “...where 9-1-1 calls for a specific territory are initially routed for response and where personnel respond to specific requests for emergency service...”. The sub-committee believes that a single set of servers that distribute calls to multiple answering locations is actually part of the routing process, much like a legacy selective router is today. The sub-committee believes the call is not responded to until answered by trained staff. The sub-committee also believes that there must also be common management of staff and technology, common IP systems such as a single computer aided dispatch system, a common radio network and common policy and procedure. Also, the sub-committee believes it is critical that telecommunicators
operating in the virtual environment must be able to directly dispatch all emergency resources within the virtual service area from all of the virtual PSAP points.

The sub-committee heard from several counties that have worked diligently to consolidate their PSAP locations and/or modify their call routing plans, based on the current definition of a PSAP, to meet the PSAP reductions mandated in ORC 128.571. To change the definition at this time would negate the efforts of those who have achieved compliance and continue to work towards the next compliance milestone in 2018.

It is the recommendation of the sub-committee that the definition of a PSAP listed in ORC 128.01(P) remain as written. It is further recommended the sub-committee continue to explore this topic in light of the coming operational standards and, in conjunction with the technical sub-committee, the pending network configuration. With the potential for more shared services once the ESINet is established, the sub-committee will continue work to determine if a definition revision is possible before the next reduction required by 2018.

2. Develop language that would allow a PSAP that takes wireless calls, but does so without accepting funding, not to count against the county total number of PSAPs.

The sub-committee is recommending language changes to ORC 128.571 that would allow counties to have more PSAPs that answer wireless calls than is currently allowed, provided the following three stipulations are satisfied:

- The additional PSAPs are specifically permitted by the county’s 9-1-1 final plan.
- The additional PSAPs accept no disbursements from the 9-1-1 government assistance fund and that monies in that fund are not used to equip or operate the PSAP.
- The additional PSAPs comply with all of the technical and operational standards as prescribed in ORC 128.021.

The sub-committee is recommending the following changes to existing ORC language:

ORC 128.571(C): If a county uses disbursements to fund more than exceeds the allowable number of public safety answering points under this section, disbursements to countywide 9-1-1 systems made to the county from the wireless 9-1-1 government assistance fund and the next generation 9-1-1 fund shall be reduced by fifty per cent until the county complies with the public safety answering point limitations established under this section. Funded PSAPs must be designated in the county 9-1-1 final plan. Funding shall not be shared with, or rotated between any other public safety answering points.

ORC 128.021(A): Not later than January 1, 2014, and in accordance with Chapter 119 of the Revised Code, the steering committee shall adopt rules that establish technical and operational standards for all public safety answering points that initially answers wireless 9-1-1 calls under section 128.571 eligible to receive disbursements under section 128.55 of the Revised Code. The rules shall incorporate industry standards and best practices for wireless 9-1-1 services.
Public safety answering points shall comply with the standards not later than two years after the effective date of the rules adopting the standards. Should a PSAP be found out of compliance with the adopted standards, the county must bring the PSAP into compliance or discontinue routing wireless 9-1-1 calls to the PSAP.

Additional Recommendations

In the course of these conversations, the sub-committee is recommending additional language changes to the Ohio Revised Code to aid the 9-1-1 Administrator and ESInet Steering Committee in the transition to a Next Generation 9-1-1 Network.

1. Telecommunicator Training

In the proposed PSAP Operating Standards awaiting the JCARR review, the development and implementation of training requirements for telecommunicators was assigned to the ESInet Steering Committee. To remove any confusion for PSAP operators, the sub-committee recommends repealing ORC 4742.

2. Assignment of a County Coordinator

In an effort to aid the 9-1-1 Administrator in his efforts to implement the proposed PSAP Operating Standards, there is a need to establish a single point of contact in each county. The sub-committee is recommending the following change to ORC 128.

**ORC 128.03(NEW SUBSECTION):** Each county, council of governments or group of counties that collaborate for the purpose of providing 9-1-1 services shall designate a single point of contact (to be known as the 9-1-1 Coordinator) to serve as a liaison with the State ESInet Steering Committee and the Office of the 9-1-1 Administrator.

3. Filing of the Countywide 9-1-1 System Plan

The sub-committee has heard from several counties who have expressed concern that there is no requirement to file a copy of the county final plan with the Office of the 9-1-1 Administrator. With the transfer of responsibilities from the Public Utilities Commission to the Office of the 9-1-1 Administrator, this requirement, which was previously in PUCO rules, no longer applies. To remedy this concern, the sub-committee proposes the following change to ORC 128.

**ORC 128.03(NEW SUBSECTION):** Each county or council of governments that operate a 9-1-1 system shall be required to file their current countywide 9-1-1 system plan with the Office of the 9-1-1 Administrator within ninety days of adoption, amendment or addendum of the plan as defined in 128.03 or 128.12 of the Ohio Revised Code.