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4	BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON
6	UM 1437
7	In the Matter of,
8	TRACFONE WIRELESS, INC.
9	Application for Designation as an Eligible Telecommunications Carrier. Oregon Office of Emergency Management Response to TracFone Testimony
0	Response to Tracrone Testimony
1	The Oregon Office of Emergency Management ("OEM"), by counsel, hereby
2	submits the testimony of Shannon Marheine in response to TracFone's testimony in the above captioned matter.
3	DATED this 32 day of August 2010.
4	Respectfully submitted,
5	JOHN R. KROGER
6	Attorney General
7	
8	Steven A. Wolf, #86318
9	Attorney-in-Charge Of Attorneys for Office of Emergency
20	Management Division, State of Oregon steven.wolf@doj.state.or.us
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Page 1 – OREGON OFFICE OF EMERGENCY MANAGEMENT RESPONSE TO TRACFONE TESTIMONY

Oregon Emergency Management State 9-1-1 Program

My name is Shannon Marheine. I am the Acting Director of the Technology and Response Section of Oregon Emergency Management, and have been with the State 9-1-1 Program in Oregon for over twelve years. The State 9-1-1 Program is responsible for the administration of the legislative mandate for statewide Enhanced 9-1-1 telephone services that allow uniform, prompt, and efficient access to public and private safety services for the citizens of, and visitors to the State of Oregon.

My testimony will show that the proposed implementation of TracFone Lifeline services in Oregon will provide an increased burden on an already strained 9-1-1 emergency reporting system which is not in the public's best interest. I will show that TracFone has not obtained a certification from each Public Safety Answering Point (PSAP) in Oregon confirming that they provide their customers with access to basic and E9-1-1 services. Furthermore, I will show that the proposed processes TracFone will utilize to provide such services will add additional 9-1-1 call processing time when every second counts.

The 9-1-1 Program was established by the 1981 Oregon Legislature (ORS 403.100 – 403.380). Its primary mission is to ensure the seamless operation of the statewide Enhanced 9-1-1 system. The program is responsible for the continual coordination and management of the network necessary to deliver 9-1-1 calls, the customer premise equipment (CPE) used by the Public Safety Answering Points (PSAP) to process those calls, as well as consulting and assisting local governments with the challenges faced in the delivery of and participation in the statewide enhanced 9-1-1 emergency reporting system.

The Program is funded through the Emergency Communications Tax imposed by ORS 403.200. This tax imposes \$0.75 on any circuit or device capable of accessing the 9-1-1 network and is collected by communications providers offering such services. Communications providers submit the tax to the Department of Revenue on a quarterly basis, and in turn the D.O.R. forwards those revenues to the 9-1-1 Program for disbursement. \$0.50 is distributed to the cities and counties on a per-capita basis to fund operations, as approved under OAR 104-080, at the PSAP. The balance is administered by the 9-1-1 Program and is expended on payments to vendors for the operation and maintenance of the Enhanced 9-1-1 network, equipment upgrades at the PSAP, and the databases used to provide Automatic Location Information (ALI). The Oregon Military Department's report of 9-1-1 tax revenues, expenditures and distributions for the fourth quarter of 2009 is attached as Exhibit A. The breakdown of fourth quarter distributions to the individual PSAPs is attached as Exhibit B.

In 1999 the State of Oregon deployed border to border Enhanced 9-1-1 services. This project was initiated by the 1991 Legislature and managed by the 9-1-1 Program in cooperation with the PSAPs and Local Exchange Carriers of Oregon. The enhanced 9-1-1 system was completed prior to the January 1, 2000 deadline.

There are currently 50 PSAPs on this enhanced 9-1-1 network, which serves Oregon's 3.6 million residents. During this project each PSAP's equipment was replaced with

technology that would support the goals of the enhanced 9-1-1 initiative. These computer/telephony integrated (CTI) systems are capable of faster and more efficient processing of the 9-1-1 call as well as retrieval of Automatic Location Identification (ALI) data.

Each PSAP is connected to a statewide frame-relay network, which delivers ALI data at faster speeds than conventional modem-based methods. This frame-relay network also has the ability to deliver Law Enforcement Data Systems (LEDS) and National Criminal Information Center (NCIC) information over the same circuit resulting in significant cost savings to the PSAP. The 9-1-1 Program office is currently in the process of planning for the evolution of this frame-relay network to a network capable of delivering IP-based data elements, and ultimately digital voice communications as well as the data necessary to properly locate callers. This process is positioning Oregon for a seamless integration into the Next Generation of 9-1-1 and Emergency Communications.

In addition to the Next Generation 9-1-1 project, the State 9-1-1 Program has several ongoing projects related to 9-1-1 and emergency communications. These projects include the FCC mandated deployment of Wireless Phase II location technology, development and deployment of statewide mapping services and the associated data standards, the continual evolution of the state's Inter-Tandem transfer network, as well as the planning and provisioning of ALI database services. The Oregon 9-1-1 Five-Year Strategic Plan for 2010 to 2014 is attached as Exhibit C.

As of December 31, 2005, each PSAP was capable of receiving Wireless Phase II location information, and OEM continues to partner with Wireless Service Providers to provide the infrastructure and network necessary to deliver that Phase II data. A major obstacle the State 9-1-1 Program helped overcome was the development of a standardized ALI stream that can accommodate Phase II data elements. Using the work of the NENA Technical Committee and the NENA 02-010 Standard, the State 9-1-1 Program partnered with representatives from PSAPs, Wireless Service Providers and Oregon's Local Exchange Carriers to create the Oregon ALI Standard.

Each calendar quarter, the 9-1-1 Program Staff coordinate meetings to address the issues facing public safety communications professionals in Oregon. These meetings are held in cooperation with the Oregon Chapter of both the Association of Public-Safety Communications Officials (APCO) and the National Emergency Number Association (NENA).

Public Interest:

In Oregon the number of potential Lifeline customers is in the hundreds of thousands; this increased burden on the statewide 9-1-1 emergency reporting system would be devastating. Because of TracFone's refusal to provide answers to data requests for current subscriber numbers and its representation that it has not developed a forecast of the additional customers it will serve if its application is approved, it is difficult to gauge the exact impact. But increasing the number of devices capable of calling 9-1-1 without an appropriate funding augmentation will leave PSAPs unable to provide the level of staffing needed to accommodate callers. This will cause a delay in providing critical emergency services and will degrade the level of service currently available to all citizens

of Oregon. Depending on the magnitude of the additional load on the system, it may also be necessary to divert resources to daily operations that would otherwise be used for enhancements to and improvement of the system in accordance with the Five Year Plan.

TracFone has also refused to comply with data requests for information regarding the amounts it pays in 9-1-1 taxes or surcharges in other jurisdictions, and the mechanisms used to calculate and collect those moneys. This frustrates OEM's efforts to assess the applicability of the mechanisms that might be available to it to secure contributions to the Oregon system under Oregon law.

PSAP Certification:

TracFone's request for PSAP certification was denied by the State 9-1-1 Program on Monday, October 19' 2009; this decision was made on behalf of the PSAPs in Oregon with the unanimous support of the Stat 9-1-1 Advisory Committee. The FCC's requirement for PSAP certification requires PSAPs to certify TracFone provides basic and E9-1-1 access; in Oregon

Exigent Circumstances:

TracFone's response to the issue of Exigent Circumstances regarding 9-1-1 calls for service is that as a reseller, TracFone requires the PSAP to contact the respective underlying wireless carriers who will inform the PSAP that it is a TracFone customer and they will need to contact TracFone directly. Then the PSAP will call TracFone to proceed. This extra step in the request for assistance in an emergency situation adds precious time to the response, the potential loss of life and property due to such a delay in services is not only counterproductive to the statewide system it is a vagrant degradation of the service PSAPs provide to the citizens of Oregon.



OREGON MILITARY DEPARTMENT

HEADQUARTERS, OREGON NATIONAL GUARD 1776 MILITIA WAY P.O. BOX 14350 SALEM, OREGON 97309-5047

May 7, 2010

Respective PSAP:

This is a financial update of the 9-1-1 program for the distribution of 4th quarter 2009 emergency communications tax revenues.

During the quarter beginning January 1, 2010 through March 31, 2010, \$9,973,655 in tax revenues were received by the department. No interest earnings. As of August 1st, 2009, HB3199, section 47, removes a provision that allows earnings to be accrued in this account. Per HB2168, section 8, the equipment replacement account has been dissolved and the balance of \$500,000 will be included with this distribution. From these receipts, \$16,108 was paid to the Oregon Department of Revenue for administrative costs. The 9-1-1 program within Oregon Emergency Management incurred \$315,903 of administrative costs. Additionally, there will be an advance withholding of administrative costs for next quarter in the amount of \$400,000 (per HB2167). The contribution to the 35% Enhanced Subaccount will be \$3,490,779. The remainder, approximately \$6.65 million, will be distributed to the PSAPs as prescribed by Oregon Revised Statute 401.808 (10).

Tax Revenue	9,973,655	35% Enhancement Allocation	3,490,779
+ Interest	0	+ Revenue Department Expense	16,108
+ Additional Revenue fm OSP	0	+ OEM Admin	715,903
+ 2.5% Equip Replacement	500,000		
= Total Revenues	\$10,473,655	= Total Expenditures	\$4,222,790

Total Revenues	\$10,473,655
- Total Expenditures	(\$4,222,790)
= Distribution Amount	\$6,650,865

Following are the balances in the 9-1-1 accounts after statutory adjustments are made:

- 1. \$10,238,850.38 in the 35% Enhanced 9-1-1 subaccount (ORS 401.806 (2) and 401.808 (3))
- 2. \$0.00 in the 2.5% Equipment Replacement subaccount (ORS 401.806 (3) and ORS 401.808 (7)) Dissolved per HB2167.
- 3. \$6,650,865.06 in the distribution account (ORS 401.808 (10))

Please contact the undersigned at (503) 584-3875 or Ken Murphy at (503) 378-2911 ext. 22225 if you have questions.

Karl D. Jorgenson

Director of Financial Administration

Oregon Military Department

Exhibit A

OREGON STATE 911 TAX APPORTIONMENT AS PER ORS FOR PERIOD ENDING 12/31/09 DISTRIBUTION BASED ON RESPECTIVE POPULATIONS

	TOTAL COUNTY POPULATION	TOTAL	UNINCORP COUNTY POPULATION	AMOUNT
NAME 1045 CITY OF RIDDLE 1050 CITY OF ROSEBURG	POPULATION	TOTAL CITY POPULATION 1,355 8,085 8,085 1,115	PUPULATION	1,421.66 29,475.29
1055 CÎTY OF SUTHERLÎN 1060 CITY OF WINSTON 1065 CITY OF YONCALLA		8,085 5,925 1,115		8,177.99 1,538.98
1099 COUNTY OF DOUGLAS 1110 CITY OF ARLINGTON 1115 CITY OF CONDON	105,395	610 785 20	54,970	75,862.64 841.95 1,083.49
1120 CÎTY OF LONEROCK 1199 COUNTY OF GILLIAM	1,885	20 685	470	27.60 66,508.65 945.47
1215 CITY OF DAYVILLE		185 1,855 220		2,560.36 2,560.36 303.65
1045 CITY OF RIDDLE 1050 CITY OF ROSEBURG 1060 CITY OF SUTHSTON 1065 CITY OF WINSTON 1065 CUNTY OF YONCALLA 1099 COUNTY OF ARLINGTON 1110 CITY OF LONEROCK 1199 COUNTY OF CANYVI DAY 1210 CITY OF CANYVI DAY 1210 CITY OF LONG CREE 1225 CITY OF LONG CREE 1235 CITY OF LONG CREE 1235 CITY OF MONUMENT 1240 CITY OF MTA VERNON 1245 CITY OF BURNS 1240 CITY OF BURNS 1240 CUNTY OF GRANT 1250 COUNTY OF BURNS 1260 COUNTY OF HARNEY 1270 COUNTY OF HARNEY 1289 COUNTY OF HARNEY 1310 CITY OF HARNEY 1310 CUTY OF HARNEY 1310 CUTY OF HARNEY 1310 CUTY OF HARNEY 1410 CUTY OF HOODD RIVER		685 1,855 220 135 600 1,110		186.33 828.15 1.532.08
1260 CITY OF SENERA 1299 COUNTY OF GRANT	7,525		2,505	317.45 66,508.65 4,175.26
1310 CITY OF BURNS 1315 CITY OF HINES 1399 COUNTY OF HARNEY	7,715	3,025 1,870	2,820	2,581.07 66,508.65
1410 CITY OF CASCADE LOCKS 1415 CITY OF HOOD RIVER 1499 COUNTY OF HOOD RIVER	21,725	1,055 6,925	13,745	9,558.25
1299 COUNTY OF GRANT 1310 CITY OF BURNS 1315 CITY OF BURNS 1399 COUNTY OF HARNEY 1410 CITY OF CASCADE LOCKS 1415 CITY OF HOOD RIVER 1499 COUNTY OF HOOD RIVER 1510 CITY OF BUTTE FALLS 1510 CITY OF BUTTE FALLS 1520 CITY OF CENTRAL POINT 1525 CITY OF EAGLE POINT 1535 CITY OF JACKSONVILLE 1535 CITY OF JACKSONVILLE 1545 CITY OF MEDFORD		17,165		23,692.03
1525 CITY OF EAGLE POINT 1530 CITY OF GOLD HILL 1535 CITY OF JACKSONVILLE		1,080 2,665		1,490.67
1540 CITY OF MEDFORD 1545 CITY OF PHOENIX 1550 CITY OF ROGUE RIVER		21,504550 17,1690 17,1690 17,1690 17,1690 12,086450 17,28595 14,0868 14,0868 16,680		6,701.12 2,884.72
1552 CITY OF SHADY COVE 1555 CITY OF TALENT 1599 COUNTY OF JACKSON 1610 CITY OF CULVER 1615 CITY OF MADRAS 1620 CITY OF METOLIUS	207,010	6,680	61,624	9,220.08 85,046.84
1555 CITY OF TALENT 1599 COUNTY OF JACKSON 1610 CITY OF CULVER 1615 CITY OF MADRAS 1620 CITY OF METOLIUS 1699 COUNTY OF JEFFERSON		1,335 6,650 895	40.005	9,178.68 1,235.32
1699 COUNTY OF JEFFERSON 1710 CITY OF CAVE JUNCTION 1715 CITY OF GRANTS PASS	22,715	1,750 33,225	13,835	65,508.65 2,415.44 45,858.89
1799 COUNTY OF JOSEPHINE 1810 CITY OF BONANZA 1815 CITY OF CHILDOUIN	83,665		48,690	57, 194.65 586.60 993.78
1820 CITY OF KLAMATH FALLS 1825 CITY OF MALIN 1830 CITY OF MERRILL		425 720 21,305 805 915		1,111.10 1,262.93
1899 COUNTY OF KLAMATH 1910 CITY OF LAKEVIEW 1915 CITY OF PAISIFY	66,350	2,685	42,180	3,705.97 345.06
1999 COUNTY OF LAKE 2010 CITY OF COBURG 2015 CITY OF COUTAGE GROVE	7,600	1,080	4,665	66,508.65 1,490.67 13,091.69
2020 CÎTY OF CRESWELL 2023 CITY OF DUNES CITY 2025 CITY OF BUGENE		1,4736086905550 04473168695550 1579513893 1579513893 54		6,611.41 1,877.14 216,837.71
2030 CÎTY OF FLORENCE 2035 CITY OF JUNCTION CITY 2040 CITY OF LOWELL		9,580 5,460 1,030		13,222.82 7,536.18 1,421.66
2045 ČÍTÝ DE DAKRIDGE 2050 CITY DE SPRINGFIELD 2055 CITY DE VENETA		3,755 58,085 4,975		5,182.84 80,171.98 6,866.75
NAME OFF SULNCAM CEYER OFF SUL	347,690	1.420	90,650	6994984590574665355855675655531322770222884338254950880357655791441286648586507 1159978213785550368277851263220463201744086636364866721969906664417816897220948 127597821378555036827855186688824222089144406285858463672196990617772208287690957177364882045608233107805550861939971085244730015989090416009409911777223282876690943431594473501598880 59925318575155666614466678992081725748159969041600940991177722328287690996177722328769178766617817817876661781781781781781781781781781781781781781
2110 CITY OF LINCOLN CITY 2115 CITY OF NEWPORT		1,420 7,930 10,600		10,945.40

4+h QUARTER 2009 \$1.74

PROGRAM TAXDBO11-02 OREGON STATE 911 TAX
APPORTIONMENT AS PER ORS
FOR PERIOD ENDING 12/31/09
DISTRIBUTION BASED ON RESPECTIVE POPULATIONS

TOTAL CITY POPULATION 10,1635 3555 5950 1700 115 UNINCORP COUNTY POPULATION TOTAL COUNTY POPULATION 608493425937759522897977687657926930590162695316949952594250168443764238
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1730947748836228475551195091155650056507788955516969283809387878464338
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OREGON STATE 911 TAX APPORTIONMENT AS PER ORS FOR PERIOD ENDING 12/31/09 DISTRIBUTION BASED ON RESPECTIVE POPULATIONS

NAME	TOTAL COUNTY POPULATION	TOTAL CITY POPULATION	UNINCORP COUNTY POPULATION	AMOUNT
2125 CITY OF SILETZ 2135 CITY OF TOLEDO 2140 CITY OF WALDPORT	POPULATION	TOTAL CITY POPULATION 1,190 3,645 2,145 815		1,642.50 5,031.02 2,960.64
2125 CITY OF SILETZ 2135 CITY OF TOLEDO 2140 CITY OF WALDPORT 2150 CITY OF YACHATS 2199 COUNTY OF LEBANY 2210 CITY OF BROWNSVILLE 2220 CITY OF HALBAY 2225 CITY OF HARRISBURG 2230 CITY OF LEBANON	44,700	2,145 815 49,165 1,7840 3,4805 15,5360	16,955	66,508.65 67,860.12 2,456.84
2220 CITY OF HALSEY 2225 CITY OF HARRISBURG 2230 CITY OF LEBANON		3,455 15,580 1,135 1,660		4,768.77 21,504.33 1,566.58
2240 CITY OF MILL CITY 2240 CITY OF MILL CITY 2242 CITY OF MILLERSBURG 2245 CITY OF SCIO		1,660 1,170 790		2,291.21 1,614.89 1,090.39
2250 CITY OF SODAVILLE 2255 CITY OF SWEET HOME 2257 CITY OF TANGENT 2260 CITY OF WATERLOO		9,050 1,000 215		12,491.28 1,380.25 296.75
2299 COUNTY OF LINN 2310 CITY OF ADRIAN 2315 CITY OF JORDAN VALLEY	110,865	185 240 3,210 11,435 2,080	31,988	56,508.65 255.34 331.26 4,430.61
2310 CITY OF ADRIAN 2315 CITY OF JORDAN VALLEY 2320 CITY OF NYSSA 2325 CITY OF ONTARIO 2330 CITY OF VALE 2339 COUNTY OF MALHEUR	31,720	11,435	14,570	15,783.19 2,870.92 66,508.65
2410 CITY OF AUMSVILLE 2415 CITY OF AURORA 2420 CITY OF DETROIT		3,560 980 275 1,030		1,352.64 379.56 1,421.66
2430 CITY OF GATES 2435 CITY OF GERVAIS 2440 CITY OF HUBBARD		2,260 3,140 230		3,119.37 4,333.99 317.45
2450 CITY OF JEFFERSON 2455 CITY OF KEIZER 2460 CITY OF MT ANGEL		2,655 36,220 3,790		3,664.57 49,992.75 5,231.15
23199 COUNTY OF MALHEUR 2410 CITY OF AUMSVILLE 24120 CITY OF DETAILS 2425 CITY OF DETAILS 2425 CITY OF GARBARD 2435 CITY OF HIDANHA SON 24435 CITY OF JEFFERS 24440 CITY OF JEFFERS 24450 CITY OF KET ZERE 24450 CITY OF KET ZERE 24450 CITY OF STLVERTON 24750 CITY OF STLVERTON 24770 CITY OF SILVERTON 24770 CITY OF SUBLIMITY		3 59205024352915070500 59205024352915070500 1 23 263 6 97213 3 5 97213 23 263 6 97213		216,637.57 414.07 13,232.48
2485 ČÍTÝ OF STAYTON 2490 CITY OF SUBLIMITY 2495 CITY OF TURNER		9,5827 7,820 2,255 1,750 23,350		3,112.47 2,415.44 32,228.90
2499 COUNTY OF MARION 2510 CITY OF BOARDMAN 2515 CITY OF HEPPNER	318,170	3,295 1,4335 1,3380 1,8285	84,376	116,450.36 4,547.93 1,980.66
2520 CITY OF IONE 2525 CITY OF IONE 2530 CITY OF LEXINGTON 2599 COUNTY OF MORROW	12,540	1,880	5,310	2,594.87 393.37 66,508.65
2610 CITY OF FAIRVIEW 2615 CITY OF GRESHAM 2618 CITY OF MAYWOOD PARK 2620 CITY OF PORTLAND		9,740 101,015 750 582,130 15,535 3,130		139,426.23 1,035.18 803,486.56
2625 CITY OF TROUTDALE 2630 CITY OF WOODVILLAGE 2699 COUNTY OF MULTNOMAH	724,680	15,535 3,130	12,442	21,442.22 4,320.19 66,508.65 21,330.42
NAME CITY OF TWALCHAN OF TWALC	00 707	15,454 965 8,244 9,630	10. 204	02405241738819997885554619259466027957550778877440636886295240335496052 5069961847352833122763261966665603945771850454493396383366215216498866255666 100469698461407106885103083291793742127423215807024388656208018184893883 10048069984614071068851030832917393742127423215807024388656208018184893883 1009915841755260443887001572991331693731291125488699042384420801818489399042564271421112111211121112111211121112111211
2799 COUNTY OF POLK 2810 CITY OF GRASS VALLEY 2815 CITY OF MORO 2817 CITY OF RUFUS	68,785	170 390 275 430	10,294	234.64 538.29 379.56
2125 CITYY OF WALCHARY OF TARRENOR CITYY OF WALCHARY O	1,830	430 1,285	565	66,508.65 1,773.62

PROGRAM TAXDBO11-02

OREGON STATE 911 TAX
APPORTIONMENT AS PER ORS
FOR PERIOD ENDING 12/31/09
DISTRIBUTION BASED ON RESPECTIVE POPULATIONS

TOTAL CITY POPULATION 7395 7395 2380 4,710 4,60 UNINCORP COUNTY POPULATION THE TOTAL A TO 26,130 16,405 18,210 72,430 1,705 1,705 1,030 13,085 510 120 1,960 6,125 25,470 1,975 1,120 250 890 2,865 7,100 60 660 490 485 40 13,385 24,230 1,435 10,490 21,506 21,506 21,636 90,791 16,660 47,430 9,110 218,778 527,140 465 175 160 1,585 785 1,152,461 3,823,465 2,671,032 AMOUNT

PAGE RUN DATE: 20100507

FIVE-YEAR STRATEGIC PLAN 2010-2014



Oregon Emergency Management State 9-1-1 Program

PO Box 14370, Salem, OR 97309 503-378-2911 www.oregon.gov/omd/oem

FIVE-YEAR STRATEGIC PLAN 2010-2014

Oregon Emergency Management State 9-1-1 Program

Supported by the State 9-1-1 Advisory Committee September, 2009

PO Box 14370, Salem, OR 97309 503-378-2911 www.oregon.gov/omd/oem

Executive Summary

This executive summary of the 2010-2014 State 9-1-1 Program Strategic Plan is presented by Oregon Emergency Management. This plan outlines the State 9-1-1 program, goals and objectives, financial management activities and strategic direction to be accomplished with the resources allocated by Oregon Revised Statutes (ORS).

The mission of the State 9-1-1 Program is to provide administration of the legislative mandate for statewide Enhanced 9-1-1 telephone services that allow uniform, prompt, and efficient access to public and private safety services for the citizens of, and visitors to, the State of Oregon.

The State 9-1-1 program is a key component of the statewide public safety communications community. The program is focused on enhancing public safety communications answering systems, utilizing dedicated staff and agency personnel who are committed to serving citizens with the highest quality services.

To guide this effort, the State 9-1-1 Program has developed this strategic plan providing the framework for assigning resources and determining the direction for program activities. The plan has been approved by the State 9-1-1 Advisory Committee consisting of ten regional Public Safety Answering Point (PSAP) representatives, three local exchange carrier (LEC) representatives, and the Oregon Association of Public Safety Officials (APCO) and National Emergency Number Association (NENA) legislative advocate. The plan is a culmination of an extensive process involving member of the Oregon chapter of APCO/NENA, commercial industry experts, local service providers, and program staff.

The following strategic goals have been adopted to guide the state 9-1-1 program in fulfilling its mission:

Goal A: Enhance the quality of the statewide 9-1-1 answering system to ensure that all citizens and visitors have access to public safety answering services that are reliable, redundant, secure and diverse.

Goal B: Enhance Network capabilities statewide for emerging technologies, disaster recovery, and multi-jurisdictional cost efficiencies.

Goal C: Enhance the communication and information exchange between the State 9-1-1 Program and public safety agencies and strengthen relationships with Oregon's public safety communications community.

Goal D: Ensure the financial stability of the State 9-1-1 Program and public safety communications systems to sustain their long-term viability as state-of-the-art communications networks.

Executive Summary Cont.

A total of 18 objectives have been established to guide the State 9-1-1 Program's approach to accomplish the four goals. Each objective relates to a specific goal, which will be addressed in this strategic plan implementation process.

The strategic plan forms the basis for the tasks and strategies managed by the program leadership and staff. The state 9-1-1 program will ensure resources are appropriately allocated and committees are assigned activities in support of the goals. Strong local government support will be necessary to respond to the rapid workload and activity growth required for the State Program to effectively respond to the needs identified during the planning process.

There will be many more accomplishments to celebrate in the future. Our action plan will result in a statewide system that allows citizens to easily and effectively request emergency assistance, and permits public safety personnel to communicate as needed statewide. The 9-1-1 Program will build on its past successes to continue the strongest possible public safety communications systems for local governments and their citizens.

State 9-1-1 Program Strategic Plan Table of Contents

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Oregon State 9-1-1 Program

Mission

The mission of the State 9-1-1 Program is to provide administration of the legislative mandate for statewide Enhanced 9-1-1 telephone services that allow uniform, prompt, and efficient access to public and private safety services for the citizens of, and visitors to, the State of Oregon.

Vision

Provide public safety answering points the highest quality, well-maintained 9-1-1 systems to ensure accurate, efficient, and expedient response to emergency calls for help. Provide the coordination and implementation of a secure and technologically intelligent statewide network for call transfer, data sharing, and disaster recovery, and emerging technologies capabilities.

Program Introduction

The 9-1-1 Program was established by the 1981 Oregon Legislature (ORS 401.706-790), its primary mission is to ensure the seamless operation of the statewide Enhanced 9-1-1 system. The program is responsible for the continual coordination and management of the network necessary to deliver 9-1-1 calls, the customer premise equipment (CPE) used by the Public Safety Answering Points (PSAP) to process those calls, as well as consulting and assisting local governments with the challenges faced in the delivery of and participation in the statewide enhanced 9-1-1 emergency reporting system.

The Program is funded through the Emergency Communications Tax. This tax imposes \$0.75 on any circuit or device capable of accessing the 9-1-1 network and is collected by communications providers offering such services. Communications providers submit the tax to the Department of Revenue on a quarterly basis, and in turn the D.O.R. forwards those revenues to the 9-1-1 Program for disbursement. \$0.50 is distributed to the cities and counties on a per-capita basis to fund operations, as approved under OAR 104-080 at the PSAP. The balance is administered by the 9-1-1 Program and is expended on payments to vendors for the operation and maintenance of the Enhanced 9-1-1 network, equipment upgrades at the PSAP, and the databases used to provide Automatic Location Information (ALI).

In 1999 the State of Oregon deployed border to border Enhanced 9-1-1 services. This project was initiated by the 1991 Legislature and managed by the 9-1-1 Program in cooperation with the PSAPs and Local Exchange Carriers of Oregon. The enhanced 9-1-1 system was completed prior to the January 1, 2000 deadline.

There are currently 50 PSAPs on this enhanced 9-1-1 network, which serves Oregon's 3.6 million residents, at the time the system went live in 1999 there were 56 PSAPs. During this project each PSAP's equipment was replaced with technology that would support the goals of the enhanced 9-1-1 initiative. These computer/telephony integrated (CTI) systems are capable of faster and more efficient processing of the 9-1-1 call as well as retrieval of Automatic Location Identification (ALI) data.

Each PSAP is connected to a statewide frame-relay network, which delivers ALI data at faster speeds than conventional modem-based methods. This frame-relay network also has the ability to deliver Law Enforcement Data Systems (LEDS) and National Criminal Information Center (NCIC) information over the same circuit resulting in significant cost savings to the PSAP. The 9-1-1 Program office is currently in the process of planning for the evolution of this frame-relay network to a network capable of delivering IP-based data elements, and ultimately digital voice communications as well as the data necessary to properly locate callers. This process is positioning Oregon for a seamless integration into the Next Generation of 9-1-1 and Emergency Communications.

In addition to the Next Generation 9-1-1 project, the State 9-1-1 Program has several ongoing projects related to 9-1-1 and emergency communications. These projects include the FCC mandated deployment of Wireless Phase II location technology, development and deployment of statewide mapping services and the associated data standards, the continual evolution of the state's Inter-Tandem transfer network, as well as the planning and provisioning of ALI database services.

As of December 31, 2005, each PSAP was capable of receiving Wireless Phase II location information, and OEM continues to partner with Wireless Service Providers to provide the infrastructure and network necessary to deliver that Phase II data. A major obstacle the State 9-1-1 Program helped overcome was the development of a standardized ALI stream that can accommodate Phase II data elements. Using the work of the NENA Technical Committee and the NENA 02-010 Standard, the State 9-1-1 Program partnered with representatives from PSAPs, Wireless Service Providers and Oregon's Local Exchange Carriers to create the Oregon ALI Standard.

Each calendar quarter, the 9-1-1 Program Staff coordinate meetings to address the issues facing public safety communications professionals in Oregon. These meetings are held in cooperation with the Oregon Chapter of both the Association of Public-Safety Communications Officials (APCO) and the National Emergency Number Association (NENA).

Goals and Objectives

In order to fulfill its mission, the State 9-1-1 Program has established four major goals for the years 2010 through 2014. These goals with their accompanying objectives are realistic and measurable. Completion of the goals will enable the program to build upon prior achievements by strengthening the state 9-1-1 program.

Reaching these goals relies heavily on the support of the State 9-1-1 Advisory Committee members, public safety answering point personnel, and the State 9-1-1 Program staff.

Goal A: Enhance the quality of the statewide 9-1-1 answering system to ensure that all citizens of and visitors to the State of Oregon have access to public safety services that are reliable, redundant, secure and diverse.

Objective 1 - Ensure ongoing quality maintenance and operations of statewide 9-1-1 equipment purchased through the 9-1-1 Program on behalf of the PSAPs.

Objective 2 - Improve the redundancy and security of the existing statewide frame relay network.

Objective 3 - Ensure the timely distribution of emergency communication excise tax to local governments.

Objective 4 - Ensure comprehensive training opportunities for PSAP managers and public safety communications partners through cooperative planning with the Oregon chapter of APCO/NENA.

Goal B: Enhance Network capabilities statewide for emerging technologies, disaster recovery, and multi-jurisdictional cost efficiencies.

Objective 1 – Design a statewide IP network for 9-1-1.

Objective 2 – Implement a statewide IP network for 9-1-1 based on the approved design created by Objective 1 of Goal B.

Objective 3 – Develop a plan for the statewide use of IP network to support IP CPE applications including shared geo-diverse systems.

Objective 4 – Review and update state mandated disaster recovery plans for all primary PSAPs in the state.

Objective 5 – Continued coordination with the Oregon APCO/NENA Consolidation Task Force (CTF) to promote multi-jurisdictional projects.

Goal C: Enhance the communication and information exchange between the State 9-1-1 Program and public safety agencies and strengthen relationships with Oregon's public safety communications community.

Objective 1 - Coordinate regional collaboration on PSAP Mapping systems, GIS data development, and GIS data maintenance.

Objective 2 – Further enhance the State Program's web site to improve communications with other public safety entities as well as the general public.

Objective 3 - Clarify stakeholder participation in various State 9-1-1 committees.

Objective 4 – Expanded financial report delivery to Oregon's public safety communications community.

Goal D: Ensure the financial stability of the state 9-1-1 program and public safety communications systems to sustain their long-term viability as state-of-the-art communications networks.

Objective 1 – Promote enhanced educational and outreach programs to strengthen the community's awareness of and support for public safety communications initiatives; including local and state government officials.

Objective 2 – Coordinate the purchase of 9-1-1 communications systems for statewide continuity.

Objective 3 – Prepare cost-benefit analysis reports regarding the state emergency communications excise tax in preparation for possible future revenue needs.

Objective 4 - Seek innovative cost-saving initiatives without reducing the quality of the statewide systems.

Objective 5 - Seek new and/or revised mechanisms to ensure all parties subject to the emergency communications excise tax are reporting and remitting.

History of 9-1-1 in Oregon

In 1981 the Oregon Legislature issued a mandate for statewide 9-1-1 services and instituted a 3% surcharge on subscriber's telephone lines. The Legislature called for implementation of 9-1-1 services statewide by December 31, 1991. At that time there were over 280 Public Safety Answering Points (PSAPs) in Oregon with only a few providing basic 9-1-1 service and none providing enhanced 9-1-1 service.

This Legislation included the creation of the State 9-1-1 Program within Oregon Emergency Management (OEM).

In January of 1991 the state/local partnership completed the 1981 mandate; Oregon became the sixth state in the country to have border to border 9-1-1 services. During this ten-year period, local PSAP user groups worked to consolidate the call taking and dispatch functions. The number of communication centers declined from 293 to just 91 statewide.

In June of 1991 the Legislature mandated Enhanced 9-1-1 in all of Oregon by the year 2000. An Enhanced 9-1-1 system provides the address (location) and phone number of the telephone making the emergency call for help as well as the responsible police, fire and medical response agency for that location. The Legislature also increased the rate of taxation from 3 percent to 5 percent. The additional 2 percent was earmarked by the state to pay for state-wide Enhancement of existing 9-1-1 systems and the establishment of a Telecommunicator standards and certification program.

In July of 1993 Oregon became the first state in the nation to establish minimum Telecommunicator and Emergency Medical Dispatcher standards and certification requirements with annual maintenance requirements through a program managed by the Department of Public Safety Standards and Training.

In June of 1995 the Oregon Legislature changed the structure of the tax from 5 percent of the local access bill to a flat rate of 75 cents on any retail subscriber who has telecommunication services capable of accessing 9-1-1 services. Reasons for this adjustment included actions by the Oregon PUC which sharply reduced 9-1-1 revenues and revolutionary changes occurring in the telecommunications industry. Cellular (wireless telephone) service was developing rapidly with increasing numbers of 9-1-1 calls being placed on wireless phones. Subsequently, the Federal Communications Commission adopted rules requiring wireless companies to be able to provide the location of a wireless 9-1-1 call by October of 2001 (The Phase II Wireless mandate).

In July of 2007 the Oregon Legislature extended the 9-1-1 tax sunset date on lines capable of accessing 9-1-1 to January 1, 2014. They also moved the Oregon Emergency Management Division and its 9-1-1 Program from being a division of the Oregon State Police to the Oregon Military Department.

Appendix B Achieving the Goals and Objectives

Goal A: Enhance the quality of the statewide 9-1-1 answering system to ensure that all citizens of and visitors to the State of Oregon have access to public safety answering services that are reliable, redundant, secure and diverse.

Goal A - Objective 1:

Ensure ongoing quality maintenance and operations of statewide 9-1-1 equipment purchased through the 9-1-1 Program on behalf of the PSAPs.

Action Plan

Design and implement a records management systems for tracking all maintenance service agreements for all primary PSAPs in Oregon. Records will include CPE upgrade, maintenance, and hardware refresh schedules; mapping upgrade, maintenance, and hardware refresh schedules; and UPS install and maintenance records.

Goal A - Objective 2:

Improve the redundancy and security of the existing statewide frame relay network.

Action Plan

Create and implement a State 9-1-1 Minimum Network Security Baseline SOP. Review and implement any necessary network segmentation by utilizing firewalls between PSAPs, OEM, and other network access points. Restricting network access for end user to that deemed necessary and appropriate by OEM. Dedicate a resource internally within the State 9-1-1 Program for network security management.

Goal A – Objective 3:

Ensure the timely distribution of emergency communications excise tax to local governments per ORS.

Action Plan

Conduct annual review of distribution procedure to ensure timely processing of the quarterly 9-1-1 excise tax to local governments. Proactively monitoring fund limitations amounts to ensure there are no future delays in the distribution process due to budget limitations. Continue to promote "auto" deposits and streamlined distribution efforts for continued efficiencies.

Goal A - Objective 4:

Ensure comprehensive training opportunities for PSAP managers and public safety communications partners through cooperative planning with the Oregon chapter of APCO/NENA.

Action Plan

Provide enhanced training opportunity via the four quarterly State 9-1-1 Program and APCO/NENA joint meetings. Fostering relationships with vendor partners and other State programs to provide instruction on emerging technologies and best practices throughout the nation.

Goal B: Enhance network capabilities statewide for emerging technologies, disaster recovery, and multi-jurisdictional cost efficiencies.

Goal B - Objective 1:

Design a statewide IP network for 9-1-1.

Action Plan

Utilizing an outside consultant, design and implement a comprehensive IP network statewide to replace the Program's existing frame relay network. Utilizing the State Next Generation (NG) 9-1-1 committee the Program will participate in the design of the network to ensure three main factors are considered; reliability, security, and redundancy.

Goal B - Objective 2:

Implement a statewide IP network for 9-1-1 based on the approved design created by Objective 1 of Goal B.

Action Plan

Create a migration path to begin implementation of the statewide 9-1-1 IP network to include a timeline and cost associated with each phase of implementation and ongoing maintenance. Implementation will include a Standard Operation Procedure (SOP) for the security and access of the network.

Goal B - Objective 3:

Develop a plan for the statewide use of IP network to support IP CPE applications including shared geo-diverse systems.

Action Plan

Complete two IP CPE projects to educate all stakeholders in the network support necessary to utilize such systems. Including the share of a system between two separate PSAPs over a network connection; one host PSAP and one remote PSAP.

Goal B - Object 4:

Review and update state mandated disaster recovery plans for all primary PSAPs in the state.

Action Plan

An annual review of every primary PSAP disaster recovery plan will be conducted to include a report outlining plan revisions.

Goal B - Objective 5:

Continued coordination with the Oregon APCO/NENA Consolidation Task Force (CTF) to promote multi-jurisdictional projects.

Action Plan

Program staff will provide input and review recommendations from the APCO/NENA CTF to further the migration of equipment, data, and physical PSAPs to regionally beneficial systems.

Goal C: Enhance the communications and information exchange between the State 9-1-1 Program and public safety agencies and strengthen relationships with Oregon's public safety communications community.

Goal C: Objective 1:

Coordinate regional collaboration on PSAP GIS Mapping systems, GIS data development, and GIS data maintenance.

Action Plan

Review current GIS data development and maintenance procedures for each PSAP to include their respective County and City GIS partners. Promote regional data development projects and data sharing statewide. Review current PSAP GIS Mapping systems to ensure continuity in statewide mapping functionality for 9-1-1. Review current GIS data layers funded by the 9-1-1 Program and make recommendations for extended or enhanced data layers.

Goal C: Objective 2:

Further enhance the State Program's web site to improve communications with other public safety entities as well as the general public.

Action Plan

Provide additional links and reports regarding the current projects and financial reporting of the State 9-1-1 Program. Provide additional links to 9-1-1 educational and emerging technologies information and training.

Goal C: Objective 3:

Clarify stakeholder participation in various State 9-1-1 committees.

Action Plan

Provide individual web pages on the State 9-1-1 Program website for each State committee to include; committee overview, charters, meeting notices, and meeting minutes.

Goal C: Objective 4:

Expanded financial report delivery to Oregon's public safety communications community.

Action Plan

Provide quarterly State 9-1-1 Program expenditure reports for each individual PSAP as well as combined statewide total. Utilize newly developed records management systems to provide a detailed summary of expenditures by cost code.

Goal D: Ensure the financial stability of the State 9-1-1 Program and public safety communications systems to sustain their long-term viability as state-of-the-art communications networks.

Goal D: Objective 1:

Promote enhanced educational and outreach programs to strengthen the community's awareness of and support for public safety communications initiatives; including local and state government officials.

Action Plan

Provide promotional publications to any requesting primary public safety answering point to support public information sharing efforts. Coordinate with OEM's Public Information Officer to develop outreach information and publications.

Goal D: Objective 2:

Coordinate the purchase of 9-1-1 communications systems for statewide continuity.

Action Plan

Review and approve all PSAP communications systems funded directly by the State 9-1-1 Program to ensure all purchases meet the base levels of functionality and that all systems are cost-effective solutions.

Goal D: Objective 3:

Prepare cost-benefit analysis reports regarding the state emergency communications excise tax in preparation for possible future revenue needs.

Action Plan

Coordinate with the Next Generation 9-1-1 (NG9-1-1) committee to compile and produce a costbenefit analysis on Next Generation 9-1-1 technologies to plan for possible future revenue needs beyond the current tax rate.

Goal D: Objective 4:

Seek innovative cost-saving initiatives without reducing the quality of the statewide systems.

Action Plan

Continual analysis of 9-1-1 emerging technologies and citizen expectations of emergency services in the State of Oregon.

Goal D: Objective 5

Seek new and/or revised mechanisms to ensure all parties subject to the emergency communications excise tax are reporting and remitting.

Action Plan

Research existing funding mechanisms in other states to prepare comprehensive law changes necessary to ensure all telecommunications providers are equally contributing to the Oregon emergency communications excise tax.

Appendix C Funding Priorities for the State 9-1-1 Program

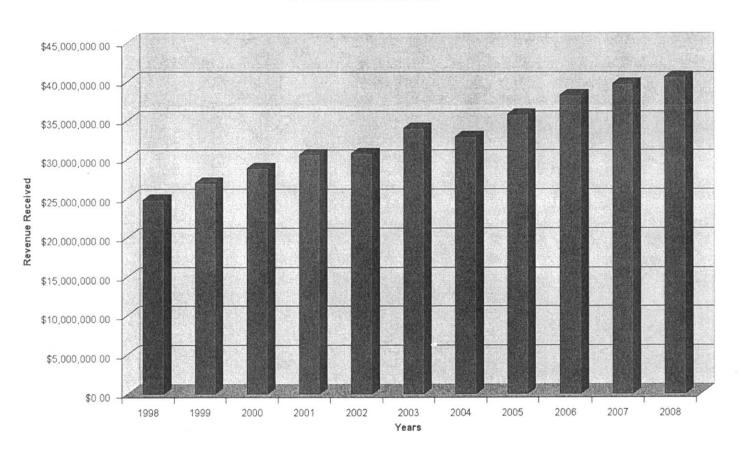
Regional and county expenditures of 9-1-1 funds are generally limited to those activities associated with the delivery and processing of 9-1-1 calls. Historically the State 9-1-1 Program has interpreted this provision to apply to the following cost categories:

- Network: Dedicated network costs (over which 9-1-1 calls are delivered) and selective routing of 9-1-1 calls;
- Database: Costs associated with provision of the ALI database, either by a telephone company, or by a third-party database provider;
- Customer Premise Equipment (CPE): PSAP equipment that a 9-1-1 call-taker uses to process the call (including selected ancillary equipment such as headsets and integration of other lines that support the functioning of a 9-1-1 center); and
- Addressing and mapping: Costs associated with geographic addressing and mapping to support the regional 9-1-1 system, including initial project and ongoing maintenance costs.
- Coordination services: Costs associated with overall system administration, training, outreach, planning and policy development.
- Wireless Services: The coordination of wireless Phase I & II deployment and cost recovery.

Appendix D Financial

9-1-1 Revenue Trend

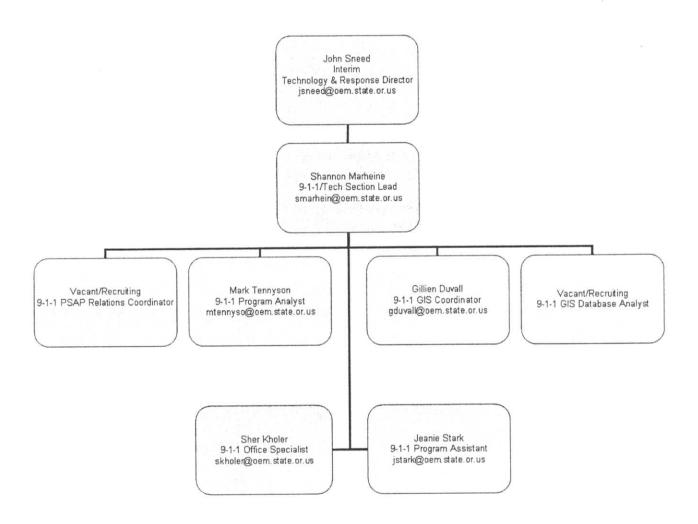
9-1-1 Revenue 1998-2008



Appendix E Staffing Summary

The State 9-1-1 Program staff operates from the Anderson Readiness Center in Salem, Oregon. The staff performs functions such as training and professional development for public safety personnel, financial administration of the tax emergency communications excise tax, systems and networks, and geographic information systems coordination.

The following is an organization chart of staff resources for the State 9-1-1 Program.

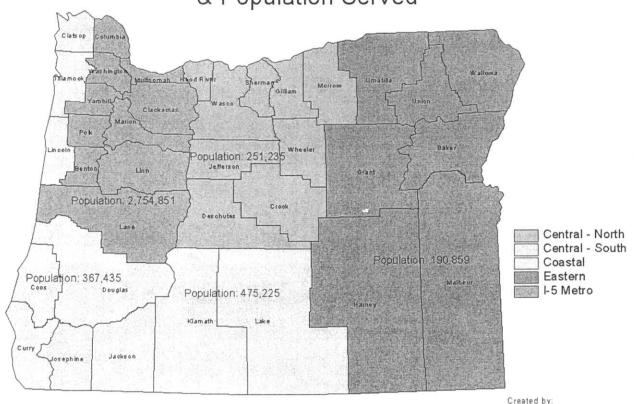


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Appendix F The Role of the State 9-1-1 Advisory Committee

The role of the Advisory Committee is to provide direct input from the 9-1-1 Community to the State 9-1-1 Program. The goal is a collaborative effort to have the needs of the State's PSAPs met through the program; specifically the needs as outlined in ORS 401. It is important that all members of this committee as well as the communities they represent are aware that this committee is and will always be advisory. The State 9-1-1 Program is responsible for making final decisions on program issues, but with the use of an advisory committee the Program will have the opportunity to take the opinions of this committee into consideration while planning and implementing the Program's projects, creating and reviewing the Program's policies, and in creating and revising Program objectives.

Oregon 9-1-1 Advisory Committee Regions & Population Served



Created by: Oregon Emergency Management May 14, 2008

Appendix G

State 9-1-1 Advisory Committee Members

John Sneed	State 9-1-1 Program
Shannon Marheine, ENP	State 9-1-1 Program
Mark Tennyson	State 9-1-1 Program
Gillien Duvall	State 9-1-1 Program
Larry Hatch, ENP	PSAP Metro/I5 Region
Sally Jones, ENP	PSAP Metro/I5 Region
Leslie Taylor	PSAP Metro/I5 Region
Lisa Turley, ENP	PSAP Metro/I5 Region
Mark Buchholz	PSAP Metro/I5 Region
Lynn Reeves	PSAP Metro/I5 Region
Margie Puckett, RPL	PSAP Central South Region
April Stream	PSAP Central North Region
Ann Rakosi	PSAP Coastal Region
Tim Best	PSAP Eastern Region
Terry Swearingen	LEC – Qwest
Diane Carlson	LEC – Verizon
Dennis Redmond	LEC – Embarq
Hasina Squires	Oregon APCO/NENA Advocate

State Of Oregon **Primary PSAPs** Wallowa Co 9-1-1 Warco Co 4-1-1 Wam Sprigt FD Bake (Co 9-1-1 East Late 9-1-1 Prineville PO West Lase 9-1-1 O starto P D Cestral Lare 9-1-1 MallettCo 9-1-1 000 CD 9-1-1 Baras PD RVC-COM Klam ati Co 9-1-1 LETS9-1-1

Oregon Emergency Management 9-1-1 Program Revised: February 12, 2009

County:

Primary PSAP:

Baker County	Baker County Consolidated 9-1-1 Dispatch	
Benton County	Corvallis Regional Communications Center (CRCC)	
Clackamas County	Clackamas County Communications (CCOM)	
	Lake Oswego Communications (LOCOM)	
Clatsop County	Astoria Police Department	
	South Clatsop County Communications	
Columbia County	Columbia 9-1-1 Communications District	
Coos County	Coos Bay Police Department	
	Coos County Sheriff's Office	
Crook County	Prineville Police Department	
Curry County	Brookings Police Department	
	Curry County Sheriff's Office	
Deschutes County	Deschutes County 9-1-1	
Douglas County	Douglas County Emergency Communications	
Gilliam/Sherman/Wheeler Counties	Tri-County Communications (TRICOM)	
Grant County	John Day Police Department	
Harney County	Harney County Sheriff's Office	
Hood River County	Hood River County Dispatch Center	
Jackson County	Rogue Valley Consolidated Comm. (RVCCOM)	
	Southern Oregon Regional Communications (SORC)	
Jefferson County	Jefferson County Sheriff's Office	
	Warm Springs Police Department	
Josephine County	Josephine County 9-1-1 Agency	
Klamath County	Klamath County 9-1-1 Communications	
Lake County	Lake Emergency Telephone System	
Lane County	Central Lane Communications	
	East Lane Communications	
	South Lane Communications (SOLCOM)	
	West Lane Communications	
Lincoln County	Lincoln County Communications Agency (LINCOM)	
	Lincoln City Police Department	
	Toledo Police Department	
Linn County	Linn County Sheriff's Office	
Malheur County	Ontario Police Department	
	Malheur County Sheriff's Office	
Marion County	Willamette Valley Communications Center (WVCC)	
	North Marion County Communications (NORCOM)	
	Santiam Canyon Communications Center	

Primary cont.

Morrow County	Morrow County Sheriff's Office
Multnomah County	Bureau of Emergency Communications (BOEC)
Tillamook County	Tillamook County Emergency Communications
Umatilla County	Hermiston Police Department
	Umatilla County Sheriff's Office
	Milton-Freewater Police Department
Union County	Union County Communications
Wallowa County	Wallowa County Sheriff's Office
Wasco County	Wasco County Communications
Washington County	Washington County Consolidated Comm. (WCCCA)
Yamhill County	Yamhill Communications (YCOM)
	Newberg/Dundee Communications

Second	larv	PSA	Ps:
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Counties Served:

V	
Oregon State Police – Southern Command Center	Baker, Coos, Curry, Douglas, Grant, Harney, Jackson, Klamath, Lake, Malheur, Umatilla
Public Safety & Standards Police @ OSU	Benton
Oregon State Police – Northern Command Center	Benton, Clackamas, Clatsop,
Oregon State Ponce - Northern Command Center	Columbia, Crook, Deschutes, Gilliam,
	Sherman, Wheeler, Hood River,
	Jefferson, Lane, Lincoln, Linn, Marion,
Pay Cities Ambulanes	Morrow, Multnomah, Tillamook
Bay Cities Ambulance	Coos
Myrtle Point Police Department	Coos
North Bend Police Department	Coos
Reedsport Police Department	Douglas
Josephine County Sheriff's Office Communications	Josephine
Junction City Police	Lane
Lane County Sheriff's Office	Lane
Springfield Police Department	Lane
Sweet Home Police Department	Linn
Lebanon Police Department	Linn
Albany Police Department	Linn
Port of Portland Communications Center	Multnomah
Umatilla Police Department	Umatilla
Chiatina i once Department	Omacma

1 CERTIFICATE OF SERVICE 2 I hereby certify that on the 3d day of August 2010, I served a copy of the foregoing 3 Response to TracFone Testimony by U.S. Mail and electronic mail, and addressed to the following: 4 5 Gordon Feighner, Energy Analyst Robert Jenks, Executive Director Citizens Utility Board of Oregon Citizens Utility Board of Oregon 610 SW Broadway, Suite 308 610 SW Broadway, Suite 308 Portland, OR 97205 Portland, OR 97205 7 G. Catriona McCracken, Legal Counsel Raymond Myers, Attorney Citizens Utility Board of Oregon Citizens Utility Board of Oregon 8 610 SW Broadway, Suite 308 610 SW Broadway, Suite 308 Portland, OR 97205 Portland, OR 97205 10 Kevin Elliott Parks, Staff Attorney Michel T. Weirich Citizens Utility Board of Oregon Regulated Utility & Business Section 610 SW Broadway, Suite 308 11 1162 Court Street NE Portland, OR 97205 Salem, OR 97301-4096 12 Mitchell F. Brecher Debra McGuire Mercer Greenberg Traurig, LLP 13 Greenberg Traurig, LLP 2101 L Street NW, Suite 1000 2101 L Street NW, Suite 1000 14 Washington DC 20037 Washington DC 20037 Richard A. Finnigan 15 Brant Wolf Attorney at Law Oregon Telecommunication Ass'n 777 13th Street S.E., Suite 120 2112 Black Lake Blvd. S.W. 16 Olympia, WA 98512 Salem, OR 97301-4038 17 Lawrence Reichman Perkins Coie LLP 18 1120 N.W. Couch Street, 10th Floor Portland, OR 97209-4128 19 20 21 Steven A. Wolf, OSB #86318 22 Assistant Attorney General Government Services Section 23 steven.wolf@doi.state.or.us