



THE STATE
of **ALASKA**
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Department of Public Safety

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May 7, 2020

Ms. Christine O'Conner, Executive Director
Alaska Telecom Association
201 E. 56th Avenue Suite 114
Anchorage, AK 99518

Subject: Response to May 6 Alaska Telecom Association Correspondence

Dear Ms. O'Conner:

We received your correspondence dated May 6th regarding our 911 Call Intake System procurement, RFP 2020-1200-4534. We found the letter to be inflammatory and rife with factually incorrect information provided to the executive and legislative branches of Alaska government which we must now correct. I hope that the narrative that follows is instructive and otherwise puts your concerns to rest.

We indeed provided project information to the Alaska Telecom Association (ATA) in a timely manner. The Department of Public Safety (DPS) introduced to you personally on January 3, 2020. A written project scope and proposed schedules, in conjunction with a special meeting of the ATA membership, was additionally provided on January 9, 2020. Additionally, our team made a formal presentation to the Regulatory Commission of Alaska (RCA) on February 26, 2020, which was published to all certificated carriers, as well as regulatory attorneys and interested members of the public.

As stated in the current procurement, this is a cooperative effort between the DPS and the Fairbanks North Star Borough (FNSB). The mandatory solicitation scope of services is primarily a replacement for the existing FNSB 911 system (already Wireless 911 Phase 1/Phase 2 capable), which includes the DPS communications center on Peger Road. The DPS made a formal commitment to FNSB to proceed with this solicitation since they have an immediate need for a system replacement and are incurring quarterly support and maintenance fees for a system that is 'end of life.' You may wish to research the FNSB Assembly records to become more familiar with the terms of our agreement with the FNSB.

The procurement was indeed created with the benefit of technical analysis and the direct experience of our team having implemented most of the existing Wireless 911 Phase 1/Phase 2 systems in Alaska. Currently, it allows us to serve almost 80% of the State's population.

In our meeting on March 5, 2020, we agreed that we would not release our formal Wireless 911 Phase 1/Phase 2 request letters for at least a month and until we held technical coordination meetings with the affected carriers. The State 911 Coordinator, Mr. John Rockwell, has found individuals representing the affected carriers to be elusive and unwilling to commit to any meetings. In fact, when Mr. Rockwell recently requested your assistance in developing a distribution list, you refused to participate. Given the impacts of the current pandemic, we allowed this behavior to continue for a short time.

Mr. Rockwell set a technical coordination meeting date for May 14th at 1:00pm via Microsoft Teams, a facility which is publicly available for remote teleconference meetings. However, in an email to Mr. Rockwell dated May 6, you stated: "At this time ATA's membership prefers not to join the technical workshop." It is indeed unfortunate, and confusing, that you choose not to participate in this process while at the same time demanding further information.

To continue the recollection of the March 5th meeting, it was apparent that some of your membership are not familiar with current national standards and industry practices for the delivery and routing of 911 calls. The DPS was presented with a spreadsheet indicating that it would cost one carrier \$18 million annually to provide Wireless 911 service, which is patently absurd. We will take the additional step of introducing your members to the third-party providers who would support their Phase 1/Phase 2 implementation efforts and provide the appropriate technical guidance.

If you will re-read the solicitation, you will note that the DPS indicated our *desires* to move forward with the implementation of Wireless 911 Phase 1/Phase 2 capability. As you are aware, the RFP is not a formal request; it includes a comprehensive statement of our implementation plans. The impacted carriers (several of whom are *not* ATA members) will be notified in a timely manner as our implementation proceeds.

The current configuration of 911 call routing from rural Alaska to DPS dispatch centers is well known. When callers from rural Alaska dial 911, they are routed through 'call forwarding' mechanisms to administrative lines at Public Safety Answering Points (PSAPs) that can only receive the voice of the caller. There is no location information nor call-back number attached to the call. If the call is unexpectedly terminated, or if the caller cannot provide their location, we are unable to re-connect or to provide any public safety services in response to the call for service.

Our initiative is to implement Wireless 911 Phase 1/Phase 2 service, that has been available in the State of Alaska for almost twenty years, to all Alaskans. This will allow us and other first responders to save lives that would have been lost due to the unavailability of this capability in their area. Again, the DPS is fully committed to providing this essential level of service to all Alaskans since this is the

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current minimum service level for most of the State's population. Our primary public safety mission is to serve rural Alaska.

You and your members should be aware of the formal process with the Federal Communications Commission (FCC) to request a waiver of the requirement to provide Wireless 911 Phase 1/Phase 2 services. If you, or they, are not aware of this process, please consult your regulatory attorneys. As this is a federal regulatory matter, it is unproductive to subvert the due process that we are both entitled.

Since you have chosen to void your promise on March 5th to communicate directly with this office with questions and concerns and recently to "...participating in a collaborative, productive process...", we ask that you make use of the appropriate public forums to raise any future issues, such as opening a docket with the Regulatory Commission of Alaska or with the FCC.

In closing, the DPS will continue with the current procurement as-is. We will also send our formal Phase 1/Phase 2 request letters to the mobile network operators which are eligible to receive them. These letters will indicate our formal (statutory) request, as well as an offer to 'meet and confer' on the timelines, for implementation. We presume that a failure to collaborate with DPS will default to the statutory six-month implementation timeline identified in Code of Federal Regulations (CFR) Title 47 Section 9.10.

Very truly yours,



Amanda Price, Commissioner
Alaska Department of Public Safety

cc: Senior Policy Advisor Brett Huber
The Honorable Donny Olson
The Honorable Neal Foster
The Honorable Gary Knopp