
Alaska Telecom Association

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Christine O'Connor
Executive Director

May 6, 2020

Commissioner Amanda Price
State of Alaska
Department of Public Safety
5700 E Tudor Road
Anchorage, AK 99507

RE: RFP 2020-1200-4534 9-1-1 Call Intake System

Dear Commissioner Price,

I am writing to express ATA's strong objection to RFP 2020-1200-4534 issued April 20, 2020 and request that you immediately halt the RFP process and issue a non-binding Request for Information to allow comprehensive collaboration between your Agency and affected ATA member companies:

1. The RFP directly contradicts assurances given to the ATA during our meeting at your office on March 5, 2020.
2. The Department of Public Safety's (DPS) 911 initiative may be well intentioned, but unfortunately DPS has not yet developed the project with other stakeholders.
3. Without course correction, wireless communications capabilities in remote Alaska will be severely diminished.

Background

The ATA was first notified of this project on January 3, 2020, at which time we repeatedly requested detailed information from DPS regarding timing of the project, costs which DPS expected carriers to assume, and technical details to ensure the reliability of the 911 system. To date we have not received any of this information.

During ATA's meeting with you and Deputy Commissioner Morgan on March 5, 2020, we stated unequivocally that if the project proceeded as described publicly (and now in the RFP) several rural wireless providers would be forced to cease operation due to the extreme costs of the upgrades DPS would require. During our meeting Deputy Commissioner Morgan stated that it is not the Department of Public Safety's intent to force rural telecom companies out of business. Commissioner Morgan stated that DPS would work with all companies to determine appropriate timing and provide technical information. Deputy Commissioner Morgan proposed that ATA participate in a series of technical workshops with DPS staff to develop technical information and identify cost impacts. We appreciated your and Deputy Commissioner Morgan's assurances and left the meeting committed to participating in a collaborative, productive process with DPS.

Instead of pursuing the workshops we discussed to develop critical information needed for a successful project, DPS has issued an RFP which contradicts the assurances we received in your office March 5th. Instead of working with the ATA on a timeline which would avoid extreme collateral damage to rural providers, the RFP dictates a timeline to issue Phase 2 wireless location requests. If followed, this timeline will eliminate several rural wireless providers due to the extreme costs imposed on small companies. It is appalling that DPS would cause the shutdown of wireless networks in rural Alaska by issuing mandates without consideration of the wireless providers' ability to comply – even after your office was informed of these consequences. It is our hope that the RFP will be withdrawn and the threat to wireless service for Alaskans in the most remote parts of our state will be removed.

The RFP has been issued without a single technical session to explore and vet detailed, technical requirements with Alaska's telecommunications providers. Lacking information, we are concerned that the project may not be technically sound and relies on imposition of onerous cost requirements on providers, even beyond the Phase 2 requests already discussed. It is critical that DPS work with the telecommunications industry to develop a reasonable timeline and the critical technical details necessary for this project to be successful.

We ask that you withdraw RFP 2020-1200-4534 and instead issue a non-binding RFI to gather information from all stakeholders which will then support development of a workable timeline and the technical details integral to a project which is critical to public safety. ATA's members remain committed to connecting Alaskans to emergency services, as we have for decades. We respectfully request that the Department of Public Safety change course to collaboratively advance 911 services for Alaskans.

Sincerely,



Christine O'Connor
Executive Director

cc:

Deputy Commissioner Leon Morgan

Sr. Policy Advisor Brett Huber

The Honorable Donny Olson, Alaska Senate, Public Safety Finance Sub-Cmte. Chair

The Honorable Neal Foster, Alaska House of Representatives, Finance Cmte. Co-Chair

The Honorable Gary Knopp, Alaska House of Representatives