



APCO International
Association of Public Safety Communications Officials



**The Keystone Chapter of the National Emergency Number Association (PA NENA)
&
The Pennsylvania Chapter of the Association of Public Safety Communications
Officials International (PA APCO)**

Position Paper on the Rewrite of Act 78, Public Safety Emergency Telephone Act

It is the belief of PA NENA and PA APCO that a rewrite of Act 78 is long overdue. Act 78 was originally passed in 1990 to formally establish 9-1-1 in the Commonwealth of Pennsylvania and to provide funding for its implementation and operation. Times have changed greatly in the last eighteen years. Technology has advanced far beyond what was envisioned when Act 78 was written and the importance and operations of 9-1-1 has grown dramatically.

Amendments have been made piecemeal to the Act. Wireless and Voice over Internet Protocol (VoIP) have been added and, hopefully soon, Multiline Telephony Systems (MLTS). Other technologies such as Next Generation 911 (NG911), Texting, Video, Automatic Notification, and Tracking are looming. There is currently a diverse and inequitable funding stream that doesn't even begin to cover the costs of current operations let alone future advancements.

We need to better define 9-1-1 as it currently exists, plan for future technologies, and identify the related costs and funding sources. The goal should be to fully fund 9-1-1 from user revenues and plan for reasonable future cost increases. To accomplish that, PA NENA and PA APCO strongly recommends that a rewrite of Act 78 be undertaken and that the following key issues be addressed and accommodated in the new legislation.

- The current state of technology must be defined and future advancements identified. The Act must be rewritten in such a way as to allow for the addition of new means of 9-1-1 access and the surcharging of those technologies to fund their implementation and continued operation.
- The rewritten Act should include Wireline, Wireless, VoIP, and any future mechanism of accessing 9-1-1 as one complete "package". The key criteria should be the means of accessing 9-1-1 for assistance.
- Entire sections of the Act are no longer relevant to today's telephony and should be removed. Other sections should be extensively modified to account for new technologies and Next Generation 9-1-1.
- Required reports and plans must be consolidated, streamlined, and simplified. 9-1-1 staff spend far too much time completing required plans and reports that are often less than meaningful or outdated. Accountability must be maintained but



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- the mechanisms should be simplified and made more general to accommodate future operations.
- A true cost of providing 9-1-1 across the state must be established as a baseline to evaluate expenditures and funding streams. Funding must be reevaluated and should:
 - Fully fund the operating costs of the Public Safety Answering Point (PSAP)
 - Be flexible enough to change based on emerging technology without extensive legislative rewrites
 - Have a built in escalation formula to adjust for future expenses and rising costs
 - Be fair and equitable across the range of technologies
 - Funding must be accomplished in a rational manner allowing PSAP's to budget within their fiscal year and project a reasonably accurate picture of revenues
 - Eligible expenses must be clearly defined and a simple mechanism to add or modify future expenses should be included.
 - Accountability of the telephony providers must be maintained but it must be uniform and reasonable to minimize reporting. It must also be flexible enough to account for future technologies
 - Minimum training levels for PSAP staff should be established with reasonable benchmarks that can be enforced. Again, future flexibility should be included.
 - The County plan in particular must be simplified. Technical standards must be reduced to a minimum to allow for changing technology. The current regulations require far too much unrelated material that is time consuming to compile and no longer relevant to what PSAP's do.

Please feel free to contact us at the numbers below. We are open and willing to answer any questions you may have.

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