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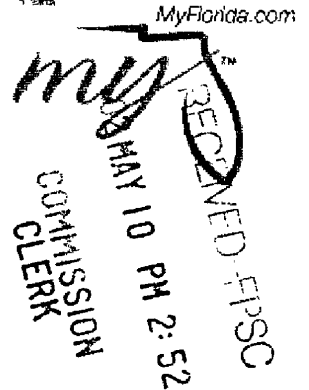
STATE OF FLORIDA

ORIGINAL

STATE TECHNOLOGY OFFICE

4030 Esplanade Way, Suite 180 • Tallahassee, Florida 32399-0950

May 10, 2002



Ms. Blanca Bayo, Director  
Division of Records & Reporting  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0870

010963-TP

RE: Comments Filed Responding to Workshop in Docket No. ~~010163~~ TP-Investigation into  
Telecommunications Rate Center Consolidation in the State of Florida.

Dear Ms. Bayo:

In accordance with Section 365.171, Florida Statutes, the State Technology Office has responsibility for the oversight and coordination of 911 in the State of Florida. Based upon information presented by BellSouth and Sprint in the Rate Center Consolidation Workshop held in Tallahassee on March 15, 2002, there appears to be a great deal of concern regarding a potential negative impact on Florida's 911 systems. In presentations by these local exchange companies, both BellSouth and Sprint representatives expressed serious reservations regarding this issue.

At the present time, any failure of the Automatic Number Identification (ANI) signal will cause the system to immediately route the 911 call to a designated default Public Safety Answering Point (PSAP) within the county where the 911 call originated. This allows the 911 caller to be queried by a 911 call taker familiar with that county, in other words, a person knowledgeable about landmarks, streets, churches, restaurants, and public buildings in the 911 caller's location. With this current default arrangement, the knowledgeable 911 call taker is naturally able to facilitate the most immediate emergency service response to the 911 call.

The concern from the 911 community regarding rate center consolidation revolves around potential default routing changes. With the implementation of rate center consolidation, it appears there is definitely a potential for **only one default routing point being tasked to handle multiple counties**. This would mean that 911 call takers, located at the one designated PSAP and unfamiliar with the locale of 911 callers in other counties, would receive all "failure" calls to arrange for first responders. Should this situation be created as a result of the implementation of rate center consolidation, the State of Florida will have taken a giant step backward in providing emergency service responses to its citizens and visitors.

As mentioned earlier, currently when a 911 call is default routed, that call goes to a PSAP within the same county. Under the potential rate center consolidation scenario, if a 911 call is default routed to one designated PSAP in a distant county, an individual unfamiliar with the distant county could answer the 911 call. This situation will affect the speed and efficiency for re-directing 911 requests to the proper responding agency, thus having the potential to delay critical

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assistance. In addition, this situation will increase a county's costs (both recurring and non-recurring) to remedy staffing problems for handling calls at a designated PSAP in a remote location.

The 67 counties in Florida have worked tirelessly to ensure that Florida's 911 systems provide the best 911 service available. Any situation or influence that degrades high quality 911 service or increases the counties' costs to provide this service will have a definite negative impact on 911 interests. Therefore, the State Technology Office encourages the Florida Public Service Commission to make every effort possible to identify in this investigation the total impact of rate center consolidation on 911 systems.

If the FPSC staff has any questions or needs additional information from the State Technology Office, please contact me at 850/922-75001 or [winston.pierce@myflorida.com](mailto:winston.pierce@myflorida.com) or Jim Martin, Statewide 911 Coordinator, at 850/922-7445 or [jim.martin@myflorida.com](mailto:jim.martin@myflorida.com).

Sincerely,

A handwritten signature in black ink, appearing to read "Winston E. Pierce".

Winston E. Pierce, Chief  
Bureau of Policy & Regulation Services

WP:ccm:cwk

cc: Ms. Patricia Christensen  
Mr. Robert Casey  
Ms. Cheryl Bulecza-Banks  
Mr. Levent Ileri  
Mr. Rick Moses