



CITY OF CAMBRIDGE

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EMERGENCY COMMUNICATIONS DEPARTMENT

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April 15, 2003

Mary Cottrell

Secretary

Department of Telecommunications and Energy

One South Station, 2nd Floor

Boston, MA. 02110

RE: D.T.E. 03-24: Comment on Proposed Rules and Regulations Establishing a Surcharge to Fund Enhanced 911 Services.

Dear Ms. Cottrell,

I am the Emergency Communications and 911 Director of the City of Cambridge. I am filing comments on the proposed rules and regulations establishing a wireline 911 surcharge on behalf of myself as the director of the Cambridge 911 Center, Cambridge City Manager Robert Healy, Cambridge Fire Chief Gerald Reardon, and Cambridge Police Commissioner Ronnie Watson.

Cambridge has the second largest number of telephone access lines in the state and a special city department with 40 employees who are primarily dedicated to operating a state-of-the-art 911 Center that receives over 50,000 emergency and 250,000 non-emergency calls each year and dispatches for all police, fire, and EMS events in the city.

Sincerely,

George L. Fosque

1. Cambridge Supports the Comments made by the Massachusetts Communications Supervisors Association

We support the comments made by the MCSA in their separate filing on docket 03-24. In particular, we feel that the 911 program supported by the interim and non-interim surcharges must include continued and future necessary support for critical PSAP 911 call processing equipment and PSAP 911 equipment operator training provided by and through the SETB and the state's 911 Telco vendor (currently Verizon).

2. 911 Operators (called Emergency Telecommunications Dispatchers in Cambridge) are at the heart of the 911 program and should be required to achieve a specific set of pre-service training program certifications, under state guidelines, sufficient to meet 911 Program objectives.

Currently only 16 hours of initial training is required for new 911 operators in the state (titled differentially as Police Dispatchers, Public Safety Dispatchers, 911 Dispatchers, Emergency Telecommunications Dispatchers, etc.). This pre-service training is far too little initial training and does not provide 911 callers and wireline surcharge ratepayers with the services they expect or require during an emergency.

Wireline surcharge revenues must be appropriately directed to guarantee that the approximately 300 new 911 operators that are hired yearly in Massachusetts are trained and certified according to a set of standards that include how to handle all of the major emergency categories that describe 911 calls (fires, alarms, vehicle accidents, domestic violence, heart attacks, robberies, unconscious person, etc.); how to process those calls according to state standards of timeliness, customer-service and efficiency; how to operate all PSAP equipment; and how to follow state and local procedures and rules for call handling and processing.

A few local PSAPs have evolved pre-service training and certification programs that may serve instructive. Cambridge has established a six-month, three-part certification and training program for all newly hired ETDs. The pre-service program consists first of the 5-week SETB-MCSA sponsored Dispatch Academy (in which 7 basic certifications are received), followed by a 2-week local Cambridge pre-service course, followed by a 16-week formal OJT program operated under national (APCO) guidelines. During the OJT phase, Cambridge ETDs must achieve three local certifications in Call Taking, Emergency Medical Dispatch, and rather Basic Police or Fire Dispatch. This

type of certification-based classroom and structured OJT training is essential to the proper operation of our state's 911 Program.

3. Unlike all other public safety professionals, 911 Operators are not currently required to take any training or continuing education courses during their entire careers; this must change if the Massachusetts 911 Program is to be successful. Accordingly, we request that an in-service training program be developed and supported by 911 Program funds.

There are approximately 1574 persons in the state who work full-time as non-sworn 911 Operators, 593 who work part-time as non-sworn 911 Operators, 179 non-sworn 911 Operator Supervisors (virtually all of whom work as line 911 operators either on a frequent or occasional basis), 272 sworn police officers or firefighters who work full-time as 911 Operators, and a large number (over 2000) of additional sworn personnel who fill-in as 911 Operators on an occasional or part-time basis. None of these individuals, except sworn police officers who must take 40-hours of in-service training each year, are required to engage in any in-service training of any kind.

In almost all PSAPs, including Cambridge, there is little or no ability to pay the costs of 911 Operator in-service training because of very limited training budgets and the need to back-fill on overtime behind any 911 Operator that is sent to training.

Developing 911 Operator ability to give lifesaving instructions to callers with a choking child, to gather critical information from a victim of domestic violence, to skillfully handle a suicidal caller, to understand how to deal with a mentally unstable caller, to properly assess the danger of a hazardous materials leak, or to assure scene safety at a bank robbery are all critical skills that PSAPs wish to develop more among their 911 operator staff.

The state 911 Program needs to set specific skill standards and related funding support for in-service training of 911 Operators, so that they can build and maintain their skills and knowledge sufficient to meet caller needs. We will provide further information on various approaches to improving in-service training for 911 Operators at the oral comments opportunity.

4. Cambridge requests that 911 wireline funds continue to support reasonable and customary, as well as necessary, costs for the provision of PSAP equipment used for the receipt and processing of 911 calls.

Since 1996, the Massachusetts 911 Program has placed various equipment in the Cambridge Emergency Communications and 911 Center (also called a "PSAP"). For example, the program has provided 911 telephone answering units ("APU"), instant call playback units, TTY keyboards, audio tape loggers, headsets, call detail printers, CAD interface units, some other equipment and supplies that contribute to the successful daily operation of the Cambridge 911 Center.

We wish to continue to receive this equipment and supplies under SETB program standards as well as have the ability to receive future replacement and other equipment and supplies sufficient and necessary to meet 911 Program goals.