

CITY OF CAMBRIDGE

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EMERGENCY COMMUNICATIONS DEPARTMENT

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Mary Cottrell
Secretary
Department of Telecommunications and Energy
One South Station, 2nd Floor
Boston, MA. 02110

RE: D.T.E. 03-24: Reply 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 reply 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

Reply Comments

1. Cambridge supports the proposed wording change voted by the SETB Standards committee that is reflected in the SETB comment letter of April 22, 2003 from Paul Fahey to Mary Cottrell.

We believe it is vital that the SETB have the authority to make expenditures for the 911 Program during the interim surcharge period that are necessary to the operation of the 911 Program whether or not they have been made in the past (i.e., customarily"). Especially in a time of heightened domestic security we should be careful to assure reasonable flexibility to insure that the 911 Program is able to adapt to the changing nature of emergencies that may occur in our communities.

2. We attach revised notes that accompanied the oral testimony of George Fosque at the April 30 DTE Hearing. The handout information has been expanded to include more specific cost information on in-service and pre-service training needs.

Outline of Oral Comments by George Fosque, Emergency Communications and 911 Director, City of Cambridge

1. Introduction

- ?? Cambridge operates one of the larger consolidated (police, fire, and EMS) 911 Centers (called a "PSAP") in the state
- ?? Have second largest number of telephone lines in the state (250,000 access lines compared with Boston at 1,000,000)
- ?? Receive 50,000+ 911 and other Emergency calls and alarms each year; generate 125,000 police, fire and EMS dispatches
- ?? Staff the Center with from 4 to 7 ETD's (our title for 911 Operators) plus a Communications Supervisor each shift
- ?? Since the early 1990's, Cambridge has made a major investment in developing the technology, staff skills, and services provided by its 911 Center

2. Observations on the Status of 911 and 911 Operators in Massachusetts

- ?? 911 is one of the most important services provided by localities to their citizens. It is a local, municipal program operated by local police, fire, and communications agencies.
- ?? In the last 10 years, non-sworn specialized personnel have largely replaced police officers and firefighters as 911 Operators/Dispatchers in many of the 265+ 911 Centers in the state. For example, in 265+ PSAPs in January of 2003 there were 1750+ full time non-sworn dispatchers compared to 300 full time sworn dispatchers. See the MCSA survey at www.ma911.org.
- ?? Technology has taken over the 911 Center; Cambridge personnel operate 12 different major technical systems
- ?? Call Handling Protocols have developed as the standard of care in other states and are gradually being developed in Mass. Two examples are the SETB "Silent Call" protocol and the Emergency Medical Dispatch used by Cambridge and some other centers
- ?? Almost all 911 Centers are staffed at the minimum, with little or no capacity for non-line functions such as training or staff development. In Cambridge, we are not able to pay for any in-service training because we operate 50-75% above our OT budget due to staff shortages of various types
- ?? Dispatcher jobs are shift-working, lower pay, high-stress, multi-tasking, inside, and often require mandatory OT

- ?? Turnover is a major issue ranging from 15%/year up to 50%/year in some centers
- ?? In sum: in our state the “profession” of 911 Operator is still largely in its infancy. Compare to the development of EMTs into a profession over the last 30 years.

3. Comments on the Wireline 911 Funding Regulations

- ?? General support for the regulations as drafted except for certain areas
- ?? 911 is far more than telephone switches, ALI databases, circuits, and telephone devices. Need to redress the imbalance between spending on telephone equipment versus spending on the development of dispatcher skills and call-processing equipment and materials in local PSAPs
- ?? Given the constraints of Directory Assistance funding of wireline 911, the 911 Program have done a good job of insuring that when callers dial 911 the phone starts to ring reliably on local PSAPs. The fund has done less well at insuring that localities are properly supported with training, equipment, and supplies necessary to handling 911 calls once they are answered.
- ?? See Cambridge comments on 03-24 for detail: three major areas are described below

4. Support for Adequate Pre-Service Training and Certification of newly hired 911 Operators

- ?? We must insure that every 911 Operator is properly prepared and certified to answer and process 911 calls
- ?? Approximately 300 new full-time 911 operators are hired each year across the state; they currently are required to receive only 16 hours of training which is currently focused mostly on two topics: how to operate the 911 phone device (“APU”) and how to operate the TTD keyboard system so that calls from hearing-impaired persons are handled properly.
- ?? Over the last two years, the MCSA and the SETB have developed and now sponsor a 5-week Dispatch Academy that bundles 15+ mini-courses and delivers 7 certifications for each graduate.
- ?? The Academy is far undersubscribed; less than ¼ of newly hired dispatchers are able to attend. This is because localities cannot afford to pay their personnel while they are not sitting in a chair in the local 911 center. In general, only the wealthier communities have been able to send their dispatchers to the

Dispatch Academy.

- ?? The fund must support the prudent and reasonable costs of full participation in the Dispatch Academy by paying for new dispatchers to attend. If 300 dispatchers attend 200 hours of Academy training at an average of \$15/hr each (whether reimbursed to trainees or localities), the training support costs to the 911 program would be approximately \$900,000 each year. This is a very modest amount to pay to assure, over time, that all 911 operators have the skills and certifications required to answer and process 911 calls according to state standards.

5. Support for Adequate In-Service Training and Continuing Education of 911 Operators

- ?? Currently 911 operators/dispatchers are required to receive no in-service training each year. Many actually receive no in-service training at all and have received little or no training over many years of service as dispatchers
- ?? Contrast this with the 40 hours of yearly in-service training that every police officer receives, and the greater amount of yearly in-service training received by every firefighter and EMT.
- ?? Standards must be set for in-service training for dispatchers and funds provided for the prudent and reasonable costs of participation in this training. Only thoughtfully developed and state-approved in-service training can develop the hundreds of skills needed to handle any and all of the state's emergency events. Examples of skills that need development include: ability to handle suicidal callers, ability to question callers about domestic violence events; changing use of Emergency Medical Dispatch cards; supporting fire companies at the scene of a hazmat; managing a hostage or barricaded suspect situation; coordinating mutual-aid for a mass casualty event; understanding communications interoperability; operating 911 TTD devices; using on-call language interpretation services for 911 callers; activating the town Emergency Operations Center; liability of police dispatchers; managing dispatcher stress; etc.
- ?? The fund must support the prudent and reasonable costs of full participation in in-service training by paying for current dispatchers to attend. If the state's 2000 dispatchers attended 16 hours of In-Service training at an average of \$15/hr, the costs would be approximately \$500,000 each year to insure participation.

6. Continued Support for PSAP Equipment and Materials Sufficient to Process 911 Calls

- ?? PSAPs need to continue to receive the equipment and supplies provided through the 911 program
- ?? Additional 911 call-handling related equipment needs to be provided. Here are three examples of equipment or services that need to be continued or provided under SETB standards
 - Headsets – allow 911 operators to clearly hear callers and speak clearly back to them. Cost: about \$50/each in quantity: maximum of \$50,000 to insure that headsets are available to all PSAPs
 - EMD card sets – provide life-saving instructions to 911 callers. Cost: Maximum of \$500 per set. Usually one set is kept at each 911 phone position. There are approximately 770 phone positions (“APU”) among the state’s 265+ PSAPs. This cost would be a one-time expense of \$385,000.
 - Language Line service – allow non-English-speaking 911 callers to receive 911 service. Costs vary on service arrangements. If a master contract was negotiated on behalf of PSAPs that do not have this service provided in another way, the cost might be less than \$50,000/year.

7. Questions

End of oral presentation.