



February 24, 2020



Honorable Governor Mike Dunleavy
Governor, State of Alaska
Office of the Governor
P.O. Box 110001
Juneau, AK 99811-0001



Re: Proposed 2021 DPS Anchorage Emergency Communication Center Project

Dear Governor Dunleavy,



The purpose of this correspondence is to provide information and transparency regarding the Department of Public Safety's initiative to move 9-1-1 service and emergency law enforcement dispatching from Southcentral and Southeast Alaska into a consolidated emergency communications center located in Anchorage. Approaching your office with decades of subject matter expertise, experience and front line exposure to public safety and emergency communications from across the state, the Kenai Borough, City of Wasilla, City of Houston, Matanuska Susitna Borough Emergency Services, Ketchikan Gateway Borough, and City of Ketchikan bring forward a collaborative list of concerns pertaining to safety, technology issues, and fiscal impact. This consolidation project will have an enormous negative impact on *safety to responders, safety to the public, emergency communications as a whole*, as well as the impacts to the State's budgets moving forward at a time of historic fiscal challenges.



SAFETY ISSUES



- **Diminished First Responder Communications:** The proposed change heavily risks diminished communications between response agencies, which is the number one cited failure in line of duty death investigations for police, fire and EMS rescuers. Resources on the same scene that can see each other will be unable to communicate in a timely manner if they are unable to do a face-to-face discussion. Incidents like these can be active assailant situations, mass casualty calls, hazmat calls, and railroad emergencies where the noise may restrict the ability to verbally communicate.
- **Delay of Definitive Patient Care:** The proposed change risks delay of definitive patient care for the public in the most at-risk communities for mass casualty and complex calls – the densely populated areas of Southcentral and Southeast Alaska.



- **Underestimated Staffing Needs:** The proposed change woefully underestimates the staffing needs of a dispatch center. The proposed dispatch center would be staffed with only 2 on-duty telecommunicators available 24-hours a day with a floating 3rd telecommunicator being available at times. The initiative's goal is to take the hundreds of thousands of calls currently answered by Matcom (which by itself has a minimum staffing of 5 on duty 24-hours a day), Anchorage, Kenai Peninsula, Ketchikan, and any other 9-1-1 center currently contracted by DPS and handle this volume with less staffing than any one of those dispatch centers, let alone the combined complement. Additionally, these two staffed positions would be tasked with fielding the one million plus push to talk transmissions over DPS ALMR radio systems while simultaneously juggling those emergency and non-emergency phone calls, updating records management systems for DPS, and providing judicial service and other administrative support after hours, on weekends, and holidays. This raises enormous concerns for the workload being placed on the telecommunicators, combined with the obvious risk to both public and first responders who may be calling for help and not receiving adequate attention while the telecommunicators are fielding radio traffic while on the phone and updating records management systems.
- **Lack of Medical Director Oversight:** The project summary indicates that the telecommunicators will be processing calls through Emergency Medical Dispatch and Emergency Fire Dispatch protocols. With a lack of a medical director with State oversight, the question is forced of who will be covering not only the responsibility, but the enormous liability for properly authoring, authorizing, installing, training, use and misuse of these protocols? What will these telecommunicators be doing with the medical emergency, CPR instruction, or bleed control in a rural community that has no emergency medical service provider? How would medical direction be given to an entry-level telecommunicator on when to cease CPR instructions because no emergency services will be responding?

Most importantly in the interest of emergency telecommunicators health and well-being, what toll will these traumatic calls with no emergency response capability ultimately take on the telecommunicators mentally? As it stands today, recent studies have shown an overwhelming mental health impact on emergency telecommunicators with approximately 73% suffering from anxiety and another 49% suffering from depression. The structure and direction of this project seems it will only continue to bog down and negatively impact these current findings.

- **Continued Diminished Communications:** Local municipally operated 9-1-1 centers would remain as the primary answering point for emergency calls, and would continue dispatching Fire/EMS after gathering information from the caller, at which point, when law enforcement is also needed (which happens very frequently), the caller would then be transferred to the DPS center. This would undoubtedly result in a safety issue and communication gap if information were to change after the caller was transferred, but prior to other emergency responders arriving. Local responders essentially lose access to that timely sharing of information. It also removes the regional knowledge that a local dispatch center would have,

- **Lack of Emergency Response Resources:** While this initiative to provide 9-1-1 services to the rural areas of Alaska is reasonable and the need undisputed, these areas would still be without the resources needed for a public safety response. Providing enhanced 9-1-1 service comes with a public perception that the caller will receive an emergency response. A centralized DPS center does not improve response times for the Alaska State Troopers. What would an Anchorage based emergency telecommunicator do with an urgent, high-priority call from a rural community that will have no response? Additionally, does the staffing model allow for that telecommunicator to be tied up on that call for an extended period attempting to give bleeding control, childbirth instructions, or CPR protocol while their one other partner in the room attempts to get a first response while fielding other emergency calls?
- **Non-Compliance with NIMS Standards:** The proposed change is not compliant with the National Incident Management System (NIMS). According to the most recent standard for NIMS and the Incident Command System (ICS), "Leadership at the incident level and in EOCs facilitates communication through the development and use of a common communications plan...Integrated communications provide and maintain contact among and between incident resources, enable connectivity between various levels of government, achieve situational awareness, and facilitate information sharing (source: National Incident Management System, 3rd edition, FEMA. [October 2017])

TECHNOLOGY ISSUES

- **Substantial Increased Risk of Failure:** Safety as it relates to potential failures in the telecommunications network – as it pertains to a 1,500 mile "network-loop" consisting of multiple layers of technology provided by multiple telecommunications providers required to 'transport' a 911 call from Southeast-to-Anchorage-to-Ketchikan for ultimate dispatch is one of several primary concerns in this initiative. In the Southeast, Ketchikan dispatch, for example, currently dispatches Ketchikan based Alaska State Troopers. While this call is currently transferred from a Ketchikan dispatcher to an AST dispatcher at the Ketchikan post, it is the best possible solution as it involves a maximum of approximately 20 'route miles' of fiber optic cable, supported by an advanced all-IP network, all under the control of one company (KPU Telecommunications). This methodology ensures immediate response and a focused timely resolution should any aspect of the dispatch-network fail.
 - DPS's initiative intends to relocate the dispatch function to Anchorage. Regardless of any timing delays in relying upon a system that transfers 911 calls to Anchorage, another concern is the additional technology and network topology that is being placed in the middle of the 911 call transaction (roughly 1,500 miles roundtrip).
 - The concerns are obvious in this scenario – DPS would be inserting the technical vagaries and risk of relying upon a network consisting of an additional 1,500 route miles and multiple layers of electronics owned and operated by a variety of

companies, none of which is controlled or operated locally, and all of which have failed in the past.

- The various past outages were not anomalies. The various outages represent 'the way things are' when complex networks (spanning thousands of miles) operated by multiple companies (traversing thousands of miles of mountain top, submarine and other challenging conditions) are tasked with interconnecting and operating 24/7 without fail. All 'works', but it never consistently works without fail.
- The concern cannot be stressed enough relative to the risk of off-island network outages delaying or preventing the completion of 911 calls and related attempts to dispatch a local Trooper.

- **Current Network Failures:** As recent as December 28, 2019, a serious network issue became relevant in Southeast Alaska wherein 911 calls from cell phones were failing to complete, and wherein 911 calls from cell phones to the local Ketchikan PSAP either contained incorrect telephone number information, or no telephone information at all. In short, cell phone calls to the local PSAP did not contain name, number or address information. After an hours-long troubleshooting with ACS, the company confirmed their network was 'OK' and that the network failure must be a result of issues in the lower 48. It was determined a fiber line for CenturyLink had been severed which ultimately resulted in a nearly 24-hour outage to 911 services for mobile callers spanning from Southeast and all the way up through Anchorage. These issues are prevalent, and they are ultimately unavoidable. As much as the State would like to think they can control the private telco providers in the state, this is a grossly misguided mentality; aside from the fact the State may think they would have any kind of oversight or control over providers nationally.

- **Lack of Oversight on Technological Installation, Costs & Maintenance:** Acquisition, installation, licensing, programming and implementation of radio networks, telephone networks, dispatch equipment and software, ALMR, microwave technology, CAMA phone trunk lines, databases, etc... are all areas which would undoubtedly fall on the State's Office of Information Technology (OIT). This department seems ill-prepared to absorb an additional project workload that will be ongoing annually from this initiative forward. A major concern as evidenced in the State of Alaska FY2021 Governor's Operating Budget: "Information systems: Significant reductions in experienced programming staff due to turnover and low compensation has resulted in knowledge gaps which is expected to continue throughout FY2020. Increased risks in managing legacy technologies with Alaska Public Safety Information System (APSIN) and other back office process automation software will continue to limit efforts to modernize the department..... technical staff within the department lack processes to work within the OIT structure."

- With the Department of Public Safety requesting excess of \$800,000 for personnel costs, it begs the question of status on the capitol project overall. Has the 911 phone system

been purchased, configured, and integrated with surrounding communities? Has the system proven itself to meet all needs and functionality for providing caller street addresses in communities where no addressing systems exist? What is the overall cost associated with radio equipment, phone equipment, CAD purchase and installation, ARMS, telephone demarcation equipment, and aside from all of this, what is the annual cost associated with maintenance and upgrades moving forward?

LOCATION/ADDRESSING ISSUES

- **Absence of Current Addressing and Geographic Information Systems:**

DPS's initiative is to bring "Enhanced 911 to communities that don't currently have this service".

- Enhanced 911 is defined by providing selective routing of 911 calls based on the caller's location. Selective routing requires the addition of three components to those required for basic 911:
- A Master Street Address Guide, the translation of the address of the caller to an Emergency Service Zone, and Selective Routing Database which can translate the street address to the proper Emergency Service Zone – in essence, routing to the correct 911 center based on caller's location
- The Master Street Address Guide includes all street addresses assigned through the local Geographic Information System. Unfortunately, every single unincorporated or "Rural" areas which DPS is pursuing to provide Enhanced 911 service to currently does not, and have never had, any sort of organized addressing or GIS information. This portion of the project alone would require construction, translation, and ongoing maintenance, with additional quality control of submitted databases of subscribers, working with data provided by villages, cities, and telephone companies in all areas of the proposed system. None of these aspects have been started, solved, or vetted. It seems evident that this initiative directed at DPS is to build and turn on, only then problem solve after the fact while people's safety and lives are unquestionably at risk.

- **Ongoing maintenance and Costs for GIS:** Compiling, constructing, translating, validating, and maintaining all these databases which currently do not exist will undoubtedly take years and potentially millions of currently unbudgeted funding combined with integration of these databases into a brand new and totally separate 9-1-1 call handling system.

FISCAL IMPACT ISSUES

- **Grossly Underestimated Costs:** DPS has repeatedly underestimated or misrepresented the costs associated with an emergency communications center. There are inherent costs relating to personnel, equipment maintenance, software upgrades, equipment replacement and other operational necessities that are continuous and will inevitably rise annually. To imply there will

be a cost SAVINGS is unrealistic. The scope of work DPS claims they are going to provide is absolutely not possible with the number of positions they have forecast to staff this new center.

- Were this initiative to move forward, it would be of great wisdom to conduct an in-depth analysis of the full, long-term, real costs associated with the new Anchorage based emergency communications center prior to any additional funding being appropriated or spent.
- **Fiscal Impact on Local Companies:** Local telephone providers will be forced by DPS initiative to provide technological transport over the course of a thousand plus miles to a demarcation point in Anchorage. These circuits can run upwards of \$8,000 a month which could bankrupt some of the locally owned and operated providers. Aside from this, many of the local providers have had zero communications from the DPS sponsored project managers other than a brief press release in January of 2020.
- **Current Funding Struggles:** According to Commissioner Price's testimony to the House Finance Sub Committee in early February 2020, DPS has expended approximately 50% of their allocated \$3.5 Million and are approximately 60% complete with the "engineering phase" – or putting ideas on paper. Associated costs which will undoubtedly soar over budget for the State include
 - Increased Staffing – as the current staffing model will undoubtedly fail
 - Build/Create new dispatch center in Anchorage
 - Develop, implement, purchase, consolidate
 - New Software
 - New Hardware
 - Dispatcher Terminals
 - Building Maintenance Costs
 - Technology costs which increase annually
 - Integration with surrounding municipal PSAPs

It can be easily assumed that the annual operating budget for this emergency communications center will exceed \$3.5 Million each year, not as a one-time startup cost followed by \$870,000 annually for staffing as is being projected.
- **Economic Stimulation Shifts from Rural to Urban Communities:** Current contract fees being paid to local jurisdictions to encourage wider economic development of those municipalities would be spent solely in the Anchorage and Fairbanks areas which have strong economies. The move could devastate the ability of some agencies to maintain the high level of success and safety that is currently performed daily. Many dispatch centers would lose several employment positions resulting in more burden on those that remain and a less diverse economic investment in public safety statewide. Although DPS is encouraging that the current dispatch employees

would receive opportunity to move to Anchorage, this is directly contradicted by DPS response to Representative LeBon dated January 25, 2020: *"The cost savings are found primarily in the marginal costs of local-agency provided services and recruitment of entry-level dispatchers. Local agency services to DPS come at a higher cost due to several factors; ... DPS has already experienced attrition of existing Emergency Services Dispatcher positions, so that their replacements will likely be entry level employees starting at a lower salary level."*

It is accurate to say that the proposal, as currently drafted, could result in a more efficient 9-1-1 system for DPS in remote areas of Alaska, but that efficiency will come at the enormous cost of dispatch capabilities for local municipalities and a cost to safety, risk, and potentially life. Emergency services and their activation MUST be built for resiliency, not efficiency, if we are to provide an adequate service that our residents expect and deserve. This proposal, a carryover from Governor Walker administration, mainly focused on cutting service, and being an apparent knee-jerk reaction capitol project thrown onto DPS with inadequate foundation, must be terminated and replaced with a proposal that bolsters local dispatch centers with increased cooperation, improved reliability, and insulated resilience to disaster and failure.

Public Safety is always best handled at the lowest level of government possible. Between the MatSu, Kenai, and Southeast areas, these local 9-1-1 centers currently operate in the most effective, efficient, and life-saving manner possible as it is within their own community that they are providing service and obtaining funding. To disrupt and divide this service would not only be irresponsible, but could dangerously affect each community's emergency response in the worst way.

Combined opposition to the construction and implementation of the Anchorage Emergency Communications Center under the management of the Department of Public Safety has been resounded from the Mayors of the City of Wasilla, City of Houston, Kenai Peninsula Borough, MatSu Borough Emergency Services, Ketchikan Gateway Borough, City of Ketchikan, Matcom Public Safety Dispatch, and Soldotna Public Safety Communications Center. State representatives and Senators for their respective communities are also disheartened to hear of these proceedings on behalf of their constituents. Combined professional experience and subject matter expertise of this level must be heavily weighed and valued on a matter that will negatively affect the emergency call processing for hundreds of thousands of people.

Thank you for your time and attention to this matter.

Sincerely,


For Ketchikan Borough Mayor Pierce

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Ketchikan Borough Mayor Dial


City of Wasilla Mayor Cottle


City of Houston Mayor Thompson


Matcom Dispatch Manager Butcher


Houston Fire Dept Chief Hartley


Ketchikan City Public Utility Manager


Wasilla Police Dept Chief Smith


Mat-Su Borough Emergency Services Director Barkley

¹ The Ketchikan Gateway Borough issued a media release on November 29, 2019, highlighting the need to retain AST services in Ketchikan. A resolution voicing concern over the proposed consolidation of dispatch services is scheduled for consideration by the Borough Assembly on March 9, 2020.