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Chairman Dean Burch of the Federal Communications Commission.

"We consider the staff report to be a timely and worthwhile contribution in an area of vital importance. Its comprehensive treatment of the subject, including pending Congressional bills, as well as the California Law directing the implementation of '911' in that state by 1982, should make the Report valuable to the regulatory commissions of other states in their determination of the appropriate 911 public policy within their own jurisdictions.

"The fact that it is a local telephone service certainly makes 911 a matter of substantial concern to the state regulatory commissions, and we welcome the contribution of the PSC Staff."

James M. McCraney, Chief Communications Engineer,
California Public Utilities Commission

"As noted in your report, California now has a requirement to provide '911' in all political subdivisions by the end of 1982. As a result there is a growing interest in getting the program on the track and our Communications Branch staff will no doubt be very much involved in the near future...we plan to use this (report) as our bible in pursuing the '911' problems in the future."

Kermit E. Hill, City Manager, City of Rochester, New York.

"After a review of your report '911' Emergency Telephone Number, we are proud to endorse such a report which expresses our desires for emergency service requests on a statewide basis."

There were a few negative comments on the overall effectiveness of "911" service:

Neil Ellson, Secretary, East Aurora Fire Control
Mutual Aid Chiefs.

"If '911' were to be put in effect (in the area) seven (7) other exchanges would be involved, three (3) of them in other counties with no direct communication with East Aurora Fire Control Central Alarm office. This would result in greatly reduced first alarm services to the residents of our fire districts. We will repeat again, a greater loss of property and lives can be the only result of '911' in our area."

John J. Komar, Town Supervisor, Orangetown, New York.

"Since there are now fourteen (14) Police Departments in the County of Rockland, the calls going to one central office would be delayed, the main dispatcher would have to take down the data and then transmit this to the proper Police Department. It has been found that in these transmissions, which are duplications, some information is lost and certainly time is wasted."

Arnold E. White, Mayor, East Rockaway, New York.

"We work on two or three minute service, and I doubt that we have ever been more than five minutes from the time of call until our ambulance is in front of any home in this mile square village. No Nassau County Police or hospital ambulance can compete with this service."

"We are not too happy with this '911' number or anything that might break down due to involved mechanical operations. '911' may be an advantage in some areas, but not necessarily in all areas."

Comments of this sort are not new to the Communications Division. They reflect the sincere reservations of public safety agencies regarding the use of "911" and its effect on their overall performance in protecting the public. It is evident that in measuring the effectiveness of emergency response, these public safety agencies consider the critical time period to

STATE OF NEW YORK
PUBLIC SERVICE COMMISSION

September 7, 1973

TO: THE COMMISSION

FROM: COMMUNICATIONS DIVISION

SUBJECT: Proposal for the provision of Universal Emergency
Telephone Number "911" by telephone companies -
Case 26443

On May 15, 1973, the Communications Division submitted a report entitled "'911' - A Staff Regulatory Viewpoint of the Universal Emergency Telephone Number" to the Commission for its consideration. By notice issued May 23, 1973, the Commission distributed approximately 300 copies of the report to interested parties and requested comments, particularly in regard to the report's Conclusion and Proposal for New York State, by August 1, 1973. Nearly 100 copies of the report were subsequently requested, including those requested by A.T.&T. Company for distribution to their affiliated companies.

To date, comments have been received from a member of the United States Congress, the Chairman of the Federal Communications Commission, nine New York State Telephone Companies, a state regulatory agency, three New York State municipalities, and two members of firefighting organizations.

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All comments received have been considered, resulting in minor revisions to the Division's Proposal. Justification for these revisions is shown, and the Communications Division requests the Commission's concurrence and adoption of its Proposal as revised, at this time.

COMMENTS OF A GENERAL NATURE

Comments on the general content of the staff report were received from:

Congressman J. Edward Roush of Indiana, the principal proponent in Congress of the National use of "911" as the single number to be dialed in an emergency.

"I found the report's content very thorough. I was especially pleased with one of your conclusions, it is something I have mentioned to AT&T, namely your encouragement that 'every 911 call originated within the State of New York completes to an emergency report center or in the interim, a telephone company operator.'

"I know there is hesitation to advertise '911' too much for fear people will call '911' where it is not connected. Your recommendation fits mine exactly; make sure that '911' everywhere connects at least to an operator while we are in the process of securing '911' as the emergency number everywhere.

"I wish you every success and hope that the state of New York will undertake efforts to make this number state-wide."

be that between the receipt of an emergency call and the arrival of emergency assistance at the scene. This was discussed at some length in the report, pages 39 to 42, with the conclusion that "total response time then, would more properly include the time interval between detection (of the need for assistance) and notification (of the assistance agency), where the use of the "911" emergency number has a significant effect."

Staff remains convinced that overall response time is reduced with "911" service, and thus conveys a real benefit to the public

COMMENTS ON THE DIVISION'S PROPOSAL

The Communications Division's Proposal for New York State suggested action that would ensure that every "911" call originated within the State of New York completes to an emergency report center or, in the interim, a telephone company operator. A number of comments were directed toward specific areas of the Proposal, including objectives numbered 2, 3, 4, 6 and 15. There were no substantive comments on the objectives which are not hereafter discussed. (The Proposal as originally proposed is submitted with this memorandum as Attachment I.)

OBJECTIVE #2

2. No other digit of code shall be used as a prefix to "911".

Proposing a solution to the problem of the non-coincidence of telephone central office and jurisdictional boundaries, Mr. Stuart Dean, a volunteer fire chief, commented on objective #2 of the Proposal:

"...expand 911' to a four-digit number. For example, using the map shown on page 33 of the report, callers in Community 'A', Central Office District 'a', would dial '9-1-1-1', callers in 'A' - 'b' would dial '9-1-1-2'...etc. Calls... would be routed directly by equipment responsive to the fourth digit. This, of course, would require the correct number to be displayed on each and every telephone, a major task, but not impossible to accomplish. Also, if the public can be taught '911', it can also be taught to look at the telephone instrument to verify the fourth digit."

Over and above the technical difficulties of the solution proposed by Mr. Dean, any expansion of the number "911" to four-digits would diminish the effectiveness of the emergency number. There would be more than a single emergency number used in the area, making the appropriate number more difficult to remember and use. In addition, this solution would apply to only one segment of emergency service. A subscriber may well be in one jurisdiction for fire assistance, and another for police aid. For these reasons no revision of this objective is recommended.

OBJECTIVE #3

3. All trunk groups carrying emergency traffic shall be engineered to the probability that only one call in a hundred will encounter all trunks busy.

The comment submitted by the Chenango & Unadilla Telephone Corporation in regard to the design of trunk groups carrying emergency traffic as stated in objective #3 of the Proposal, is representative of the comments offered by five other New York State telephone companies on the same subject:

"The required engineering of trunk groups carrying '911' traffic to the probability that only one in a hundred will encounter an 'all trunks busy' condition is impractical and unmanageable for several reasons including:

- a. Inability to predict traffic volumes generated during emergency conditions.
- b. Control of circuit volumes being beyond the control of the telephone company and resting with the central receiving agency - usually by way of foreign exchange lines."

It was not intended that the provision of trunking facilities to conform to this objective would be based on data for non-recurring emergency traffic volumes, or artificially inflated traffic volumes resulting from abuse of the network. It was intended however, to set an objective level of performance in "overflows" of emergency calls which all companies would strive to attain during "normal" heavy volume periods.

To the extent that quantities of circuits are affected by 1) the number of answering personnel available, 2) the extent of the delay in answer and, 3) the holding time of emergency calls, the control of circuit quantities does rest with the receiving agency rather than the telephone company. It is expected that the aforementioned variables, among others, will be considered in the formulation of any agreement between telephone company and receiving agency for the provision of "911" service in accordance with objective #16 of the Proposal.

To the extent that public safety agency performance in servicing emergency calls does not attain the levels agreed upon by company and agency, there may be an adverse affect on company performance in regard to objective #3.

The objective therefore should be revised as follows:

3. All trunk groups carrying emergency traffic shall be engineered to the probability that only one call in one hundred will encounter all trunks busy during normal busy period conditions, provided that the answer performance of the public safety agency is in accordance with prior agency-company agreements.

OBJECTIVE #4

4. Any seven-digit numbers replaced by "911" shall be operator intercepted, for at least one year;

Commenting on the operator intercept of seven-digit numbers replaced by "911" as stated in objective #4 of the Proposal, the General Telephone Company of Upstate New York, Inc. stated:

"Many small offices are not equipped with operator intercept capabilities and the cost of providing the necessary central office equipment and outside plant facilities for this service would be excessive. The widespread and extensive publicity associated with "911" implementation should preclude the necessity for live intercept.

"It is recommended that this proposal be modified to provide for operator intercept where available and recorded intercept at other locations."

While the Rochester Telephone Corporation suggested:

"...that recommendation #4 be modified to provide for agency interception of calls to seven-digit numbers replaced by '911'."

The intent of this particular objective is to ensure that any call placed to a "vacant" seven-digit emergency number will be answered by an individual with the capability of forwarding the request for emergency aid. The intent of the objective cannot be satisfied with recorded intercept but can be accommodated with either the telephone company operator or agency intercept method. Therefore, objective #4 is revised to reflect both acceptable methods. The proposed wording is as follows:

4. Any seven-digit numbers replaced by "911" shall be intercepted by either a telephone company assistance or a public safety agency operator for at least one year;

OBJECTIVE #6

The normal routing for calls overflowing "911" emergency report center trunks will be to a telephone company assistance operator.

The Rochester Telephone Corporation suggested that objective #6 of the Proposal, relating to the routing of "911" overflows to telephone company operators, should include "...provision for direct access from the operator to the emergency report centers."

While there is merit to this suggestion, telephone companies would not be required to provide what would essentially be a private line service from their operators to the emergency report center, to service the one call in a hundred routed to overflow in normal peak periods. The telephone company assistance operator would still have the capability of forwarding the call via "911" with a .99 probability of completion.

Telephone companies would not be prohibited by objective #6, however, from providing this direct access if they so desired.

OBJECTIVE #15

Five telephone companies, all members of the Continental Telephone System in New York State, commented identically on objective #15 of the Proposal which would restrict the provision of "911" service to only those report centers where law enforcement was a participant:

"Any refusal to provide 911 service to central receiving agencies not encompassing law enforcement would seem to be beyond the discretionary power of a serving telephone company."

Previous experience has shown that "911", when implemented, will be used by the public as an "all emergency" telephone number rather than an emergency number solely for police, fire or ambulance assistance.

Because police emergencies account for a great majority of the requests for emergency aid, any "911" report center without a participating law enforcement agency may experience unanticipated emergency traffic volumes, through misdirected calls. The resultant delays in servicing requests for emergency aid, should this occur, would at best diminish public confidence in an emergency report system that would otherwise be effective.

Although the Communications Division suggests that this objective remain part of the Proposal, current federal legislation, if passed, may require that "911" be provided for emergency medical services with or without the participation of law enforcement agencies.

Senate Bill S.504, the Emergency Medical Services Act of 1973, contains a provision for a central communications system utilizing the universal emergency number "911". The bill, passed by the Senate and the House, was vetoed by the President.

On August 2, the Senate overrode the President's veto by 77 to 16, 15 votes more than the required two-thirds majority. The House has scheduled its vote on the veto for September 12.

Should this bill become law, telephone companies may be required to prepare for "911" service without the participation of law enforcement agencies, in apparent conflict with objective #15. Should this occur, relief from the provisions of this objective could be considered, the basis for such consideration being provided in paragraph two of the Proposal.

ROUTING TO "OPERATOR" IN NON-SERVICE AREAS . .

All responding telephone companies commented on that portion of the Proposal which suggests a schedule for the provision of facilities by telephone companies that would allow them to route "911" calls originated in an area where emergency report centers do not exist, to a telephone company assistance operator:

Chenango & Unadilla, Iroquois, Red Hook, Southern Counties and Western Counties telephone companies:

"The routing of all 911 calls to an operator, regardless of the availability of a central receiving agency, serves only as a replacement for the existing less complicated service, long available to the public and listed in its directories - 'in an emergency dial "0" (Operator).' Most importantly we question the wisdom of forcing major office modifications to accomplish this end."

Empire Telephone Corporation:

"... pending solution of the political and jurisdictional problems involved, it is premature and injudicious to set a specific time by which telephone companies are required to be 'ready' unless the public safety agencies are similarly required to be ready. The objective of telephone company timely readiness can be achieved by the simple requirement that 911 be preserved as an unassigned facility, or so established at the first opportunity in the reasonable growth and expansion of the existing facilities."

General Telephone Company of Upstate New York:

"It is not uncommon to find common control offices intermixed with progressive control offices in EAS networks. The connection of '911' to assistance operators for portions of such areas (common control offices) could result in confusion to the public and should not be required

"In addition, the requirement for implementation in all other central offices by 1/1/78 does not provide adequate time for the orderly and economical completion of this project. A minimum five-year period from the date of adoption of rules for completion of such a program, which would cost this Company in excess of \$400,000 for central office rearrangements and changes, would be far more reasonable.

"It is recommended that the requirement for early implementation in common control offices be eliminated and that the proposal for complete implementation not be earlier than 1980."

New York Telephone Company:

"Our present approach of scheduling '911' modifications is to do the necessary conversions on a next job basis - that is, at the next time we are working in an office to perform some other necessary central office modification. This policy seems all the more prudent considering our concern, and that of the Commission, for the level of our construction expenditures. This concern suggests strongly that forced construction outlays associated with non-revenue producing services ought to be scheduled in consort with normal equipment modifications "

Rochester Telephone Corporation:

"We are apprehensive that the interim plan will end up being the final '911' service, with telephone companies then being required to furnish equipment or make modifications to improve the service. We are definitely opposed to the prospect of permanently taking over the function of relaying emergency calls.

"However, with the growing awareness of '911' as an emergency number in the state and nationwide, and in the absence of an emergency report center, we recognize a responsibility to provide transients or inadvertent users of this number access either to a recording informing the caller that '911' is not in service and directing him to call the operator or directly to an operator who can assist in the dispatch of emergency services. In order that this be limited to transients and inadvertent users we would not contemplate providing this service if '911' was locally publicized."

A two year interval for the completion of this portion of the Proposal was chosen for all common control central offices, and in those progressive control central offices where no major modifications are required, by virtue of the fact that the majority of telephone central offices will have some equipment installation activity taking place within them at some time during this period. This would permit the modifications necessary, usually of a minor nature in such offices, to be made in conjunction with installation work required for normal growth.

In all other central offices it may be necessary to change the telephone numbers of existing subscribers in order to make the "911" code available. In addition, many of these remaining offices are small, and may not have relief jobs scheduled within a two or three year period. The four year

interval proposed, until January 1, 1978, would permit an orderly schedule for changing numbers, intercepting those numbers for a substantial period of time, and would provide an opportunity to make the necessary physical rearrangements in an orderly and efficient manner. These requirements cannot be fulfilled if the procedure is delayed until the public safety agencies are ready, as suggested by Empire.

The Proposal therefore, does not advocate company expenditures in advance of normal relief schedules, the interpretation of the New York Telephone Company, but merely sets the dates by which central offices with relief scheduled within these time intervals will be arranged to receive "911" calls. Where normal activity for growth or modifications in any central office falls beyond the suggested time interval, as suggested by the General Telephone Company of Upstate New York, application for relief from the Proposal could be considered.

In addition the Proposal states:

"This program is intended as an interim step taken while awaiting statewide provision of service through emergency report centers. It therefore should not include (but would not prohibit) publicizing '911' as the number to call in an emergency..."

Where emergency report centers do not exist, it is unlikely that "911" would replace the existing method of dialing "OPERATOR", or cause confusion in EAS free calling areas, without local publicity promoting "911" use.

CENTRAL OFFICE MODIFICATIONS

The five member telephone companies of the Continental System, commenting on that portion of the Proposal which suggested that telephone companies provide the central office modifications, additions, and inter-office trunking necessary for "911" service without charge to the served agencies, stated:

"Absorption of all the costs associated with office rearrangements and modifications for the provision of 911 is contrary to present Continental policy - we have held that the cost could be more fairly allocated to those benefiting, through payment of the charges actually incurred by the requesting agency."

Although they do not agree with this portion of the Division's Proposal, they indicate no real difficulty if it were adopted:

"The reversal of this policy would obviously present no great obstacle to the serving companies - it would however change our rate philosophy by transferring the recovery of these governmental initiated costs from tax to the telephone ratepayer."

STATE LEGISLATION

The Rochester Telephone Corporation made the following comment on the suggested use of state legislation as the means of "911" implementation in New York State:

"In the final analysis, the solution seems to lie in legislation that would mandate provision of '911' service with deadlines for implementation. It would be our hope that the Public Service Commission would play an active role in focusing public attention to this end."

The statewide use of "911" as the telephone number to be dialed in an emergency requires the cooperation and consent of every political subdivision, and every public safety agency within each subdivision, in the state of New York. This cooperation and consent could not be expected to occur in unanimity without the influence of a single authoritative body directing the actions of all participants to this end.

The State Legislature can act in this capacity, and may decide to do so with the influence and support of responsible organizations both within and outside government.

CONCLUSION

In consideration of the foregoing discussion, minor revisions to the Division's Proposal are suggested:


- A. Objective 3 and 4 should be revised to read as shown on pages 8 and 9 of this memorandum
- B. All other components of the Proposal remain unchanged

RECOMMENDATIONS

The Communications Division recommends that the Commission adopt the Proposal for New York State, as revised (included as Attachment II of this memorandum), as its policy regarding the "911" emergency telephone number, thereby:

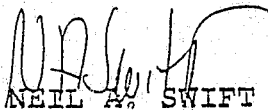
1. Adopting the objectives, as revised, as the objectives to be sought by all telephone companies in regard to the provision of "911".
2. Directing all New York State telephone companies to revise their tariffs to include the provision of "911" service to emergency report centers and to arrange their facilities, in accordance with the Proposal, so that throughout the state, "911" will become the telephone number for an operator at an emergency report center where such a facility exists, and in the event that no such facility exists in that area, that "911" will become a number for a telephone company operator who could then handle the call in the same manner as a dial "0" emergency call.
3. Supporting appropriate legislation when submitted, that is designed to stimulate development of public safety agency emergency report centers.

Respectfully submitted,



ROGER L. SUTLIFF
Chief System Planner

APPROVED:



NEIL A. SWIFT
Director of Communications Division

LAC:bvb

PROPOSAL FOR NEW YORK STATE

(AS ORIGINALLY PROPOSED)

To encourage the use of "911" as a statewide universal emergency number, the Communications Division suggests action that will ensure that every "911" call originated within the State of New York completes to an emergency report center or in the interim, a telephone company operator.

First, the following objectives are recommended by the Communications Division to be followed by New York State telephone companies in the absence of excessively burdensome influences to the contrary.

1. In all instances "911" should be a free number;
2. No other digit or code shall be used as a prefix to "911";
3. All trunk groups carrying emergency traffic shall be engineered to the probability that only one call in a hundred will encounter all trunks busy;
4. Any seven-digit numbers replaced by "911" shall be operator intercepted for at least one year;
5. The normal routing for "911" calls dialed in an area without an emergency report center shall be to a telephone company assistance operator;
6. The normal routing for calls overflowing "911" emergency report center trunks will be to a telephone company assistance operator;

7. Where "911" is implemented in a central office serving more than one jurisdiction, the telephone company need not provide selective routing of the calls of the customers in the various jurisdictions;
8. Wherever "coin-free" operation of coin telephones is planned for implementation, "911" shall be able to be dialed without the use of a coin;
9. "Called party hold" or some similar arrangement should be provided for agency trunk-lines wherever practicable;
10. All "911" emergency report center trunk-lines shall be arranged for incoming traffic only;
11. Agencies should maintain a separate seven-digit number for administrative calls;
12. "911" calls will be routed, free of charge, to no more than one emergency report center per central office;
13. The determination of the participants in a "911" system shall be the responsibility of public safety agencies;
14. The control and staffing of the emergency report center shall be the responsibility of public safety agencies;
15. No "911" service shall be provided to an emergency report center where a law enforcement agency is not a participant;
16. The telephone company shall recommend the type and quantity of trunk-lines and answering equipment to be used;

17. Agency trunk-lines and answering equipment associated with "911" will be charged to the agency at the existing tariff rates;
18. Where Selective Routing or Automatic Location Identification is employed, it shall be charged to the agency at a rate that is fully compensatory to the company;
19. Telephone companies will not bill participating agencies separately for "911" service.

Secondly, the Division suggests that all New York State telephone companies develop and implement a program to provide for the routing of "911" calls to an assistance operator in areas where "911" report centers do not exist;

- a. within two years in all common control central offices and those progressive control central offices where no major modifications are required;
- b. on a programmed basis in all other central offices so as to insure the completion of this project by 1/1/78.

This program is intended as an interim step taken while awaiting statewide provision of service through emergency report centers. It therefore should not include (but would not prohibit) publicizing "911" as the number to call in an emergency, and should not delay the provision of the service where firm orders for its implementation are received.

The Division also suggests that all New York State telephone companies provide, without charge to the served agencies, the central office modifications, additions, and interoffice trunking necessary for "911" service. This action will ensure that the cost of central office modifications for "911" will no longer be an obstacle, however small, to "911" implementation. The provision of these modifications and additions shall:

- a. include that which is necessary to direct "911" calls to no more than one receiving location per central office;
- b. not include agency trunk-lines or answering equipment, such facilities to be charged for at the existing tariff rates.

Relief from this proposal may be considered in those cases where compliance would impose a significant financial or other burden on either the telephone company or the ratepayer, and any relief granted would ordinarily be in the nature of a limited extension of the date for compliance.

It should be noted that, in addition to the previously mentioned benefits, deliberate accomplishment of the foregoing proposal will cause certain other desirable results.

For example, while the telephone companies have generally expressed willingness to provide "911" service in the face of a firm order, intervals from order to service can be in excess of 12 months. To the extent that this interval is a result of the time required to add or modify central office facilities or trunking, it will ordinarily be reduced after accomplishment of the Division's proposal.

Where conflicts exist between numbers assigned to customers, and numbers required for routing of "911" calls, the customers' number must sometimes be changed. This will also be true in the process of implementing the proposal. The difference lies in the ability to schedule the steps toward accomplishment of the proposal over a longer period of time where necessary. Proper scheduling will permit the telephone companies to provide substantial periods of intercept and call transfer service for those subscribers whose numbers must be changed, which would not always be possible when attempting to expedite provision of "911" service in the face of a firm order.

STATE LEGISLATION

Any further expansion of the "911" emergency number concept is beyond the jurisdiction of the Public Service Commission. This responsibility lies with the public, their elected representatives, and the public service agencies established to meet their needs. If these parties conclude that such expansion is desirable, legislation might be used as the means for "911" implementation in New York State.

CONCLUSION

The Communications Division is convinced that the use of "911" is beneficial to the general public, in that it eliminates the need to determine the appropriate seven-digit number to dial in an emergency, and eliminates the need to dial the "Operator" for emergency assistance.

The Division believes that every emergency call dialed with "911", throughout the state, should be answered either by an emergency report center, or telephone company operator.

The Division also believes that, in the majority of cases, the problems associated with "911" implementation can be solved, and for this reason we conclude that the statewide, and nationwide, use of "911" is a practical means of improving the effectiveness of public emergency reporting, and is therefore in the interest of public safety.

STATE OF NEW YORK
PUBLIC SERVICE COMMISSION

STATEMENT OF POLICY
ON PROVISION OF
UNIVERSAL EMERGENCY TELEPHONE NUMBER "911"
BY TELEPHONE COMPANIES
(ISSUED NOVEMBER 20, 1973)

The Commission has reviewed the development of the Universal Emergency Number "911" from its origin to its current status, identifying the regulatory considerations of its statewide, and nationwide use. In the process the Commission has examined those considerations outside the regulatory milieu, obtaining a general overview of the concept.

As a result, the Commission is convinced that the use of "911" is beneficial to the general public, in that it eliminates the need to determine the appropriate seven-digit number to dial in an emergency, and improves emergency response time in comparison with dial "0" emergency calls.

The Commission also believes that, in the majority of cases, the problems associated with "911" implementation can be solved, and for this reason it concludes that the statewide, and nationwide, use of "911" is a viable means of serving the interests of public safety.

Therefore, to encourage the use of "911" as a statewide universal emergency number, and to ensure that every "911" call originated within the State of New York completes to an emergency report center or, in the interim, a telephone company operator,

the Commission first concludes that the following objectives should be followed by New York State telephone companies in regard to the provision of "911" service in the absence of excessively burdensome influences to the contrary.

1. In all instances "911" should be a free number;
2. No other digit or code shall be used as a prefix to "911";
3. All trunk groups carrying emergency traffic shall be engineered to the probability that only one call in a hundred will encounter all trunks busy during normal busy period conditions, provided that the answer performance of the public safety agency is in accordance with prior agency-company agreements.
4. Any seven-digit numbers replaced by "911" shall be intercepted by either a telephone company assistance or a public safety agency operator for at least one year;
5. The normal routing for "911" calls dialed in an area without an emergency report center shall be to a telephone company assistance operator;
6. The normal routing for calls overflowing "911" emergency report center trunks will be to a telephone company assistance operator;
7. Where "911" is implemented in a central office serving more than one jurisdiction, the telephone company need not provide selective routing of the calls of the customers in the various jurisdictions;

8. Wherever "coin-free" operation of coin telephones is planned for implementation, "911" shall be able to be dialed without the use of a coin;
9. "Called party hold" or some similar arrangement should be provided for agency trunk-lines wherever practicable;
10. All "911" emergency report center trunk-lines shall be arranged for incoming traffic only;
11. Agencies should maintain a separate seven-digit number for administrative calls;
12. "911" calls will be routed, free of charge, to no more than one emergency report center per central office;
13. The determination of the participants in a "911" system shall be the responsibility of public safety agencies;
14. The control and staffing of the emergency report center shall be the responsibility of public safety agencies;
15. No "911" service shall be provided to an emergency report center where a law enforcement agency is not a participant;
16. The telephone company shall recommend the type and quantity of trunk-lines and answering equipment to be used;
17. Agency trunk-lines and answering equipment associated with "911" will be charged to the agency at the existing tariff rates;
18. Where Selective Routing or Automatic Location Identification is employed, it shall be charged to the agency at a rate that is fully compensatory to the company;
19. Telephone companies will not bill participating agencies separately for "911" service.

Secondly, the Commission will encourage all New York State telephone companies to develop and implement a program to provide for the routing of "911" calls, so that throughout the state "911" will become the telephone number for an operator at an emergency report center where such a facility exists, and in the event that no such facility exists in that area that "911" will become a number for a telephone company operator who could then handle the call in the same manner as a dial "0" emergency call:

- a. within two years in all common control central offices and those progressive control central offices where no major modifications are required;
- b. on a programmed basis in all other central offices so as to ensure the completion of this project by 1/1/78.

This program is intended as an interim step taken while awaiting statewide provision of service through emergency report centers. It therefore should not include (but would not prohibit) publicizing "911" as the number to call in an emergency, and should not delay the provision of the service where firm orders for its implementation are received.

The Commission will also encourage all New York State telephone companies to provide, without charge to the served agencies, the central office modifications, additions, and interoffice trunking necessary for "911" service. The provision of these modifications and additions shall:

- a. include that which is necessary to direct "911" calls to no more than one receiving location per central office;
- b. not include agency trunk-lines or answering equipment, such facilities to be charged for at the existing tariff rates.

Relief from this proposal may be considered in those cases where compliance would impose a significant financial or other burden on either the telephone company or the ratepayer, and any relief granted would ordinarily be in the nature of a limited extension of the date for compliance.

STATE LEGISLATION

Any further expansion of the "911" emergency number concept is beyond the jurisdiction of the Public Service Commission. This responsibility lies with the public, their elected representatives, and the public service agencies established to meet their needs. If these parties conclude that such expansion is desirable, responsible legislation might be used as the means for "911" implementation in New York State. Such legislation, designed to stimulate the development of public safety agency "911" emergency report centers will be supported by the Public Service Commission.

SRI INTERNATIONAL
Menlo Park, California 94025

END