

## STATE OF MICHIGAN DEPARTMENT OF STATE POLICE

RICK SNYDER GOVERNOR Lansing

COL. KRISTE KIBBEY ETUE

July 31, 2015

Rear Admiral David Simpson (Ret.)
Public Safety and Homeland Security Bureau
Federal Communications Commission
445 12th Street SW
Washington DC, 20554

RE: New and Emerging Technologies Improvement Act of 2008

Dear Rear Admiral Simpson (Ret.):

Please accept the filing from the Michigan State Police as response to the Federal Communications Commission's request in regard to the NET 911 Act.

The Michigan Emergency 911 Services Enabling Act provides for funding of 911 services in Michigan. Two funding mechanisms, a State of Michigan 911 charge and individual county 911 surcharges, are currently being collected by all communications providers serving Michigan customers on all devices. A fee for prepaid wireless customers is also collected at the retail point of sale. In addition, landline carriers collect a technical surcharge to cover their costs for providing 911 call routing to 911 dispatch centers.

If you need further information regarding the State of Michigan's 911 funding system, please do not hesitate to contact me at (517) 243-2075.

Sincerely yours,

Harriet Miller-Brown State 911 Administrator



Approved by OMB 3060-1122 Expires: March 31, 2018

Estimated time per response: 10-55

hours

### Annual Collection of Information

Related to the Collection and Use of 911 and E911 Fees by States and Other Jurisdictions

Pursuant to OMB authorization 3060-1122, the FCC's Public Safety and Homeland Security Bureau seeks the following specific information in order to fulfill the Commission's obligations under Section 6(f)(2) of the NET 911 Act:

### A. Filing Information

#### 1. Name of State or Jurisdiction

State or Jurisdiction	
Michigan	

### 2. Name, Title and Organization of Individual Filing Report

Name	Title	Organization
Harriet Miller-Brown	State 911 Administrator	Michigan State Police



#### B. Overview of State or Jurisdiction 911 System

1. Please provide the total number of active Public Safety Answering Points (PSAPs) in your state or jurisdiction that receive funding derived from the collection of 911/E911 fees during the annual period ending December 31, 2014:

PSAP Type <sup>1</sup>	Total	
Primary	148	
Secondary	0*	
Total	* There are five (5) secondary PSAPs in the State of Michigan, however, they are all operated by private EMS services and receive no direct funding through the fees and surcharges included in this report.	

2. Please provide the total number of active telecommunicators<sup>2</sup> in your state or jurisdiction that were funded through the collection of 911 and E911 fees during the annual period ending December 31, 2014:

The figures below represent an estimated number of active telecommunicators in Michigan as of July 22, 2015. The numbers are provided to the State 911 Office through the telecommunicator training tracking system via the entries by dispatch centers. If subsequent changes are made to the staffing numbers, the centers are responsible for contacting the State

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<sup>&</sup>lt;sup>1</sup> A Primary PSAP is one to which 911 calls are routed directly from the 911 Control office. A secondary PSAP is one to which 911 calls are transferred from a Primary PSAP. *See* National Emergency Number Association, Master Glossary of 9-1-1 Terminology (*Master Glossary*), July 29, 2014, at 118, 126, available at <a href="https://c.ymcdn.com/sites/www.nena.org/resource/resmgr/Standards/NENA-ADM-000.18-2014">https://c.ymcdn.com/sites/www.nena.org/resource/resmgr/Standards/NENA-ADM-000.18-2014</a> 2014072.pdf

<sup>&</sup>lt;sup>2</sup> A telecommunicator, also known as a call taker or a dispatcher, is a person employed by a PSAP who is qualified to answer incoming emergency telephone calls and/or who provides for the appropriate emergency response either directly or through communication with the appropriate PSAP. *See Master Glossary* at 137.



911 Administrator's Office in order for the updates to be processed into the system. Additionally, the tracking application system does not specify the funding source used to the cover wages for said FTEs. Wages for 911 Telecommunicators are an allowable expenditure of both State local 911 funds in Michigan.

Number of Active Telecommunicators	Total
Full-Time	1,949 Full time
Part-time	279 Part Time

3. For the annual period ending December 31, 2014, please provide an estimate of the total cost to provide 911/E911 service in your state or jurisdiction.

Amount	\$207,167,178.44
(\$)	Please see note in section 3a below

### 3a. If an amount cannot be provided, please explain why.

The amount provided to question 3 above is the total of the following:

- 1) Revenue reported by the PSAPs for 911 purposes. This includes the following: funding resources of \$198,505,685.96 for PSAPs approximately included:
  - State 911 Fee Distribution Received: \$22,986,774.39
  - Local 911 Fee Received: \$60,606,236.97
  - Millage Receipts: \$31,958,730.33
  - General Fund Monies: \$72,910,563.50
  - Other Receipts: \$10,043,380.77
- 2) The total reported\* technical costs for network collections by landline telephone companies for 911 network and delivery costs in 2014 was \$7,295,111.00
- 3) \$1,366,381.48 for calendar year 2014 for the cost of wireless 911 delivery was reimbursed to landline service providers (AT&T, Frontier, and PFN) under the Michigan Public Service Commission's Docket U-14000.



\* Crawford, Delta, and Manistee Counties did not report.

4. Please provide the total number of 911 calls your state or jurisdiction received during the period January 1, 2014 to December 31, 2014.

Type of Service	Total 911 Calls
Wireline	1,444,579
Wireless	4,159,576
VoIP	286,004
Other (texts)	113
Total	5,890,272*

<sup>\*</sup>not every PSAP reported their call volume numbers

### C. Description of Authority Enabling Establishment of 911/E911 Funding Mechanisms

1.	Has your State, or any political subdivision, Indian tribe, village or regional corporation therein
	as defined by Section 6(f)(1) of the NET 911 Act, established a funding mechanism designated
	for or imposed for the purposes of 911 or E911 support or implementation (please include a
	citation to the legal authority for such mechanism)? Check one.

•	Yes	X
	No	

### 1a. If yes, provide a citation to the legal authority for such a mechanism.

The Michigan Emergency 911 Service Enabling Act (Act 32 of 1986, as amended<sup>1</sup>) provides funding in the following ways:

- Michigan's state 911 charge is currently \$0.19 per communications device per month. After 2010, any changes to the State 911 surcharge or the distribution percentages shall be made by the legislature. MCL 484.1401a.
- Sellers of prepaid wireless communications devices are mandated to remit 1.92% per retail transaction, collected from their customer, to the Michigan Department of treasury. MCL 484.1401c.
- Each of the 83 Michigan counties has the ability to assess a county-wide surcharge on all communications devices billed to an address in the county. In 2014, sixty-six counties collected 911 surcharges ranging from \$0.20 to \$3.00 under MCL 484.1401b or MCL 484.1401e.
- Communications providers are able to recover their costs through a 911 technical charge of



up to \$0.80 a month on customer bills. MCL 484.1401d.

 $^{1} \\ \text{http://www.legislature.mi.gov/(S(q5k4ixaztjatoo2szbcdyhye))/printDocument.aspx?objectName=mcl-Act-32-of-1986\&version=txt} \\$ 

-	es, during the annual period January 1 - December 31, 2014, did your state or jurisdiction enlarge, or in any way alter the funding mechanism.
	ch of the following best describes the type of authority arrangement for the collection of /E911 fees? Check one.
	■ The State collects the fees
	■ A Local Authority collects the fees
	<ul> <li>A hybrid approach where two or more governing bodies</li> </ul>
	(e.g., state and local authority) collect the fees X
•	ribe how the funds collected are made available to localities.  For State collected Funds:  Michigan counties received 82.5% of the total Michigan state 911 charge and the prepaid device 911 charge, remitted based on MCL 484.1401(a) and 401(b). The full distribution of the State 911 Funds is listed at section E below.  Michigan PSAPs also receive 6% of the total Michigan state 911 charge and the prepaid device 911 charge under MCL 464.1408 (4) (c) for the purposes of training PSAP personnel.
•	For County collected Funds:  Communications providers remit county 911 surcharge monies directly to the respective Michigan counties imposing the surcharge.



## D. <u>Description of State or Jurisdictional Authority That Determines How 911/E911 Fees are Spent</u>

1. Indicate which entities in your state have the authority to approve the expenditure of funds collected for 911 or E911 purposes.			
Authority to Approve Expenditure of Funds (Check one)			
Yes	No		
х			
X			
oproval authority per juris vireless service, etc.)	diction ( <i>e.g.,</i> limited to		
The Michigan State 911 Committee has issued a list of Allowable Wireless and Wireline 911 Surcharge Expenditures. In accordance with P.A. 379 or 2008, any changes made to the document language must be transmitted to the Michigan Legislature, MCL 484.1401(b)(14). The use limitations contained in the list applies to both the State fees and local 911 surcharges.			
ofAllowable_14259_7.pdf	)		
MCL 484.1401b permits that a local (countywide) 911 surcharge may be assessed by the county board of commissioners in an amount not to exceed \$0.42 per month. Additional surcharge not to exceed a total of \$3.00 may be assessed on a countywide basis if approved by voters in that county under a ballot proposal.			
2. Has your state established a funding mechanism that mandates how collected funds can be used? Check one.  Yes			
	Authority to Expenditur (Check Yes  X  X  Deproval authority per jurist vireless service, etc.)  of Allowable Wireless and any changes made to the control of Allowable 14259 7.pdf  1 surcharge may be assess per month. Additional sur its if approved by voters in the control of that mandates how collections.  In that mandates how collections with the control of the		



2a. If you checked YES, provide a legal citation to the funding mechanism of any such criteria.

The Michigan State 911 Committee has developed a list of Allowable Wireless and Wireline 911 Surcharge Expenditures. In accordance with P.A. 379 of 2008, any changes made to the document language must be transmitted to the Michigan Legislature, MCL 484.1401(b)(14). (http://www.michigan.gov/documents/ListingofAllowable 14259 7.pdf?20150501092037)

2b. If you checked NO, describe how your state or jurisdiction decides how collected funds can bused.				

#### **Description of Uses of Collected 911/E911 Fees**

 Provide a statement identifying with specificity all activities, programs, and organizations for whose benefit your state, or political subdivision thereof, has obligated or expended funds collected for 911 or E911 purposes and how these activities, programs, and organizations support 911 and E911 services or enhancements of such services.

Under MCL 484.1408(4) Statutory distribution of the State 911 fee is distributed as follows:

- o 82.5% goes to the counties to fund 911 operations.
- 7.75% is used to pay the 911 service providers for the delivery of wireless calls to the PSAPs under MPSC Docket U-14000. Treasury also receives \$150,000 annually from this portion for its administration of the fund.
- o 6% is for PSAP training funds.
- o 1.88% funds the Michigan State Police PSAPs.
- o 1.87% funds the State 911 Office.

MCL 484.1406 (1) Further states, "[T]he funds collected and expended under this act shall be expended exclusively for 9-1-1 services and in compliance with the rules promulgated under section 413."

MCL484.1408 (4) (a) also authorizes the State 911 Committee to require re-payment of the use of funds considered unreasonable or unnecessary. " ... Money received by a county under this subdivision shall only be used for 9-1-1 services as allowed under this act. Money expended under this subdivision for a purpose considered unnecessary or unreasonable by the committee or the auditor general shall be repaid to the fund."



2. Please identify the allowed uses of the collected funds. Check all that apply.			
	Type of Cost	Yes	No
	Lease, purchase, maintenance of customer premises equipment (CPE) (hardware and software)	х	
Operating Costs	Lease, purchase, maintenance of computer aided dispatch (CAD) equipment (hardware and software)	Х	
	Lease, purchase, maintenance of building/facility	х	
Personnel Costs	Telecommunicators' Salaries	х	
	Training of Telecommunicators	х	
Administrative Costs	Program Administration	х	
	Travel Expenses	х	
Dispatch Costs	Reimbursement to other law enforcement entities providing dispatch	х	
	Lease, purchase, maintenance of Radio Dispatch Networks	х	
Grant Programs		If Yes, see 2a.	X
2a. During the annual period ending December 31, 2014, describe the grants that your state paid for through the use of collected 911/E911 fees and the purpose of the grant.			
N/A			



### E. Description of 911/E911 Fees Collected

1. Please describe the amount of the fees or charges imposed for the implementation and support of 911 and E911 services. Please distinguish between state and local fees for each service type.

Service Type	Fee/Charge Imposed	Jurisdiction Receiving Remittance (e.g., state, county, local authority, or a combination)
Wireline	\$.19 (state)	State
	\$0.20 to \$3.00 (local)	Local (varies by county)
Wireless	\$.19 (state) \$0.20 to \$3.00 (local)	State  Local (varies by county)
Prepaid Wireless	1.92% (state)	State only - Point of Sale for minutes purchased
Voice Over Internet Protocol (VoIP)	\$.19 (state) \$0.20 to \$3.00 (local)	State  Local (varies by county)
Other	N/A	N/A

<sup>\*</sup>local surcharge varies by county.



2. For the annual period ending December 31, 2014, please report the total amount collected pursuant to the assessed fees or charges described in Question F 1.

Service Type	Total Amount Collected (\$) <u>State</u>
Wireline	\$20,460,912.31**
Wireless	Included in wireline figure above
Prepaid Wireless	\$7,865,741.41
Voice Over Internet Protocol	Included in wireline figure above
Other	N/A
Total	\$28,326,653.72

<sup>\*\*</sup>Includes Wireline, Wireless, and VoIP state fees only (does not include local surcharges).

Service Type	Total Amount Collected (\$) <u>County</u>
Wireline	\$60,606,236.97**
Wireless	Included in wireline figure above
Prepaid Wireless	N/A
Voice Over Internet Protocol	Included in wireline figure above
Other	N/A
Total	\$60,606,236.97

<sup>\*\*</sup>Includes Wireline, Wireless, and VoIP county 911 surcharges (does not include state 911 fees).



2a. If an amount cannot be provided, please explain why.		
3. Please identify any other sources of 911/E911 funding.		
Local property tax mileage, government general funds, and revenues from and fees charged back to local public safety entities for dispatching services.		ch as tower rental
Question	Yes	No
4. For the annual period ending December 31, 2014, were any 911/E911 fees that were collected by your state or jurisdiction combined with any federal, state or local funds, grants, special collections, or general budget appropriations that were designated to support 911/E911/NG911 services? Check one.		
4a. If Yes, please describe the federal, state or local funds and am 911/E911 fees.	ounts that were co	embined with
General funds, millage collections, and fees are used to support PS, financial support of these funding sources totals about 58%, the broaden are used to support of these funding sources totals.	_	
<ul> <li>State 911 Fee Distribution - 12%</li> <li>Local 911 Surcharges Received - 30%</li> <li>Millage Receipts - 16%</li> <li>General Fund Monies - 37%</li> <li>Other Receipts - 5%</li> </ul>		
A full list of the funding sources for each Michigan county can be fo	ound at:	
http://www.michigan.gov/documents/msp/2014 Annual Report 09 7.pdf?20150723151852	to_the_Michigan_L	_egislature_4644



5. Please provide an estimate of the proportional contribution from each funding source towards the total cost to support 911 in your state or jurisdiction.	Percent
State 911 Fees	12%
Local 911 Fees	30%
General Fund - State	0%
General Fund - County	37%
Federal Grants	0%
State Grants	0%
Voter-Approved Property Tax Assessments (Millages)	16%
Other	5%



## F. <u>Description of Diversion or Transfer of 911/E911 Fees for Other Uses</u>

	Yes	No			
1. In the annual period e collected for 911 or E9 jurisdiction made avail designated by the fun Question 5? Check on	X				
1a. If No, please identify what amount of funds collected for 911 or E911 purposes were made available or used for any purposes other than the ones designated by the funding mechanism or used for purposes otherwise unrelated to 911 or E911 implementation or support, including any funds transferred, loaned, or otherwise used for the state's general fund. Along with identifying the amount, please include a statement identifying the non-related purposes for which the collected 91 or E911 funds were made available or used.					
Amount of Funds (\$)	Amount of Funds (\$)  Identify the non-related purpose(s) for which the 911/E911 funds were used. (Add lines as necessary)				



## G. Oversight and Auditing of Collection and Use of 911/E911 Fees

Question	Yes	No		
1. Has your state established any oversight or auditing mechanisms or procedures to determine whether collected funds have been made available or used for the purposes designated by the funding mechanism or otherwise used to implement or support 911? Check one.	X			
1a. If yes, provide a description of the mechanisms or procedures corrective actions undertaken in connection with such auditing at ending December 31, 2014. (Enter "None" if no actions were taken	uthority, for the an			
State 911 Fund: In accordance with MCL 484.1407 (5) the State Off an annual audit of the State 911 Fund.	ice of the Auditor G	General performs		
Local 911 Funds: Independent local audit and annual reporting pro as set out in MCL 484.1406 (2)-(4).	cess to State 911 Co	ommittee (SNC)		
Additionally, counties are subject to the review process established by the SNC. The SNC targets to review approximately 10% (eight) of the counties each year. Reviews consist of at least one on-site visit, evaluation of PSAP(s) best practices, policies and procedures, facility security /readiness, and proper 911 fund use (going back through the current year, plus two). In 2014 the following counties were reviewed:				
Baraga				
Bay				
Houghton				
Keweenaw				
Lake				
Marquette				
Ontonagon				
Schoolcraft				
Copies of each review are attached as supplemental information for	or this report.			



Question	Yes	No		
2. Does your state have the authority to audit service providers to ensure that the amount of 911/E911 fees collected form subscribers matches the service provider's number of subscribers? Check one.		X		
2a. If yes, provide a description of any auditing or enforcement or other corrective actions undertaken in connection with such auditing authority, for the annual period ending December 31, 2014. (Enter "None" if no actions were taken.)				

### H. <u>Description of Next Generation 911 Services and Expenditures</u>

Question	Yes	No
1. Does your state or jurisdiction classify expenditures on Next Generation 911 as within the scope of permissible expenditures of funds for 911 or E911 purposes? Check one.	X	

### 1a. If yes, in the space below, please cite any specific legal authority:

**For State 911 Funds**: MCL 484.1401a (4) The initial state 9-1-1 charge shall be 19 cents and shall be effective July 1, 2008. The state 9-1-1 charge shall reflect the actual costs of operating, maintaining, upgrading, and other reasonable and necessary expenditures for the 9-1-1 system in this state. The state 9-1-1 charge may be reviewed and adjusted as provided under subsection (5).

**For County 911 Funds**: MCL 484.1401b (3) The charge assessed under this section and section 401e shall not exceed the amount necessary and reasonable to implement, maintain, and operate the 9-1-1 system in the county.

While not explicit as allowable in our the language of the State's Allowable and Disallowable list for State and County 911 funds, NG911 projects and services are considered as equal projects to landline or wireless 911 systems.



	Question	Yes	No	
•	period ending December 31, 2014, has your state expended funds on Next Generation 911 ock one.	X		
2a. If yes, in the space below, please enter the dollar amount that has been expended.				
Amount (\$)	\$177,286.72 for the delivery of wireless calls throug on PFN is provided at section H 4 on page 15 below	•	rk (further info	

<ol> <li>For the annual period ending December 31, 2014, please describe the type and number of NG911 Emergency Service IP Network(s) (ESInets) that operated within your state.</li> </ol>					
Type of ESInet	Yes	No	No  If Yes, Enter Total PSAPs Operating on the ESInet	If Yes, does the type of ESInet interconnect with other state, regional or local ESInets?	
				Yes	No
a. A single, state-wide ESInet		X			
b. Local ( <i>e.g.</i> , county)  ESInet		X			
c. Regional ESInets	X		[If more than one Regional ESInet is in operation, in the		X



	space below, provide the total PSAPs operating on each ESInet]	
Name of Regional ESInet: Upper Peninsula 911 Authority	8	X

4. Please provide a description of any NG911 projects completed or underway during the annual period ending December 31, 2014.

The Upper Peninsula 911 Project which supports the eight PSAPS serving all 15 counties of Michigan's Upper Peninsula. More detailed information can be found at:

http://www.upcap.org/programs\_services/911.html

Question		Total PSAPs Accepting Texts		
5.	During the annual period ending December 31, 2014, how many PSAPs within your state implemented text-to-911 and are accepting texts?	2*		
	Question	Estimated Number of PSAPs that will Become Text Capable		
6.	In the next annual period ending December 31, 2015, how many PSAPs do you anticipate will become text capable?	15*		

<sup>\*</sup> In Michigan, as a best practice, text-to-911 is usually deployed on a county-by-county basis and in the greater metropolitan areas usually one PSAP will provide service for the entire county. For example, Oakland County Sheriff Dept is a single PSAP that answers and relays text-to-911 for 21 PSAPs in Oakland and Macomb County Sheriff Dept. PSAP that answers and relays text-to-911 for 10 PSAPs



## I. <u>Description of Cybersecurity Expenditures</u>

Question	Check the appropriate box		If Yes, Amount Expended (\$)	
1. During the annual period ending December 31, 2014, did your state expend funds on cybersecurity programs for PSAPs?	Yes	No	The state of Michigan estimated aggregate spend for Cyber Security in 2014 was \$22,871,649. This spend represents multiple categories across multiple centralized Information Technology programs for the state. The estimated spend is comprised of actual costs and estimated costs for program resources required for specific security functions. Included within this amount are cyber expenditures for centralized cyber related infrastructure and services that are used to support three state of Michigan State Police operated PSAPS in Negaunee, Gaylord, Detroit. The state of Michigan is a member of the Multi-State Information Sharing and Analysis Center and supports NIST guidelines for implementing cyber security with State of Michigan services.	

Question Total PSAPs
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Question	Yes	No	Unknown
3. Does your state or jurisdiction adhere to the National Institute of Standards and Technology Framework for Improving Critical Infrastructure Cybersecurity (February 2014) for networks supporting one or more PSAPs in your state or jurisdiction?			

### J. Measuring Effective Utilization of 911/E911 Fees

 Please provide an assessment of the effects achieved from the expenditure of state 911/E911 or NG911 funds, including any criteria your state or jurisdiction uses to measure the effectiveness of the use of 911/E911 fees and charges. If your state conducts annual or other periodic assessments, please provide an electronic copy (e.g., Word, PDF) of the latest such report upon submission of this questionnaire to the FCC or provide links to online versions of such reports in the space below.

Each year, the State 911 Committee collects data and submits a report to the Michigan Legislature with the following minimal criteria:

- A. The extent of emergency 911 service implementation in the state.
- B. The actual 911 service costs incurred by PSAPs and counties.
- C. The state 911 charge required under MCL 484.1401a and a recommendation of any changes in the state 911 charge amount, or in the distribution percentages under MCL484.1408.
- A description of any commercial applications developed as a result of implementing the 911enabling act.
- E. The charges allowed under MCL 484.1401a, 1401b, 1401c,1401d, and 1401e, and a detailed record of expenditures by each county relating to the 911 enabling act.

That report exceeds the statutory reporting of data to provide a comprehensive status report on Michigan's 911 system. The full 2015 Report can be found at: www.michigan.gov/snc