

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
State of Washington

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

Name	Title	Organization
Sigfred (Ziggy) J. Dahl	State E911 Coordinator	Washington State E911 Coordinator’s Office

**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, 2015:**

<b>PSAP Type<sup>1</sup></b>	<b>Total</b>
Primary	54
Secondary	9
<b>Total</b>	<b>63</b>

- 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, 2015:**

<b>Number of Active Telecommunicators</b>	<b>Total</b>
Full-Time	1052
Part-time	94

- 3. For the annual period ending December 31, 2015, please provide an estimate of the total cost to provide 911/E911 service in your state or jurisdiction.**

<b>Amount</b> <b>(\$)</b>	\$108,612,280*
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**3a. If an amount cannot be provided, please explain why.**

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<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 [https://c.ymcdn.com/sites/www.nena.org/resource/resmgr/Standards/NENA-ADM-000.18-2014\\_2014072.pdf](https://c.ymcdn.com/sites/www.nena.org/resource/resmgr/Standards/NENA-ADM-000.18-2014_2014072.pdf).

<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.

\*Based on 115% of statewide total E911 excise taxes collected.

**4. Please provide the total number of 911 calls your state or jurisdiction received during the period January 1, 2015 to December 31, 2015.**

Type of Service	Total 911 Calls
Wireline	999,536
Wireless	4,906,647
VoIP	360,298
Other	0
<b>Total</b>	<b>6,266,481</b>

**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 .....
- No .....

**1a. If YES, provide a citation to the legal authority for such a mechanism.**

The State of Washington and all Washington State Counties are authorized by the Revised Code of Washington (RCW) 82.14B.030 to impose an enhanced 911 excise tax on the use of switched access lines, radio access lines and voice over IP access lines.

**1b. If YES, during the annual period January 1, 2015 to December 31, 2015, did your state or jurisdiction amend, enlarge, or in any way alter the funding mechanism.**

No.

**2. Which of the following best describes the type of authority arrangement for the collection of 911/E911 fees? Check one.**

- The State collects the fees .....
- A Local Authority collects the fees .....
- A hybrid approach where two or more governing bodies  
(e.g., state and local authority) collect the fees .....

**3. Describe how the funds collected are made available to localities.**

The State and County fees are collected by the carriers and are submitted to the Department of Revenue who then deposits them into the state and counties' respective enhanced 911 accounts. The use of the fees is controlled by two mechanisms. The first is the limitations imposed by RCW 82.14B.020 and RCW 82.14B.050 that together permit a fairly broad utilization of the county tax. The second limiting factor is the requirement associated with counties receiving assistance from the State 911 Program. A definitive list of permitted uses for the funds has been directed by Washington Administrative Code (WAC) 118-66 which requires the counties to spend their local collection on those items on the list before being eligible for state assistance (in general: Counties are able to expend funds beyond call taking, on other call-taking specific functions, such as 911 hardware and software, interpretation services, etc., and remain eligible for state assistance), and also places limits on the amount that will be considered for reimbursement for many items. The funding collected from the 911 excise taxes is less than the total funding required to operate Enhanced 911 in Washington State. The remaining support comes from other local government sources.

**D. Description of State or Jurisdictional Authority That Determines How 911/E911 Fees are Spent**

1. Indicate which entities in your state have the authority to approve the expenditure of funds collected for 911 or E911 purposes.		
Jurisdiction	Authority to Approve Expenditure of Funds (Check one)	
	Yes	No
State	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Local (e.g., county, city, municipality)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
1b. Please briefly describe any limitations on the approval authority per jurisdiction (e.g., limited to fees collected by the entity, limited to wireline or wireless service, etc.)		
<p>Washington State Counties are given certain latitude in the use of the locally collected 911 funds to the degree that they must commit to expenditures in support of 911 equal to the amount that the tax generates. The rules promulgated by the State E911 Program for the use of county funds before being eligible for state assistance provides definitive control over the use of the funds in all 39 counties. For clarity, a statement identifying the appropriate use of both the state and local funds needs to take into account both the restrictions and the latitude of the enabling statutes. For the 39 counties the state provides assistance to, it is absolutely clear that the excise taxes collected are used in direct support of E911 activities. The latitude provided the counties permits them some discretion in the use of the funds, but it is clear that in each case the fiscal commitment of local government to E911 activities exceeds the local excise tax collection.</p>		

2. Has your state established a funding mechanism that mandates *how* collected funds can be used? *Check one.*

- Yes .....
- No .....

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

A definitive list of permitted uses for E911 excise tax funds is specified by Washington Administrative Code (WAC) 118-66 which requires the counties to spend their local collection on

those items on the list before being eligible for state assistance, and also places limits on the amount that will be considered for reimbursement for many items.

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

**E. Description of Uses of Collected 911/E911 Fees**

- 1. 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.**

RCW 38.52.520 specifies the duties of the State of Washington E911 Coordinator’s Office. Broadly, these duties include: Coordinating and facilitating the implementation and operation of enhanced 911 emergency communication systems throughout the state; Considering the base needs of individual counties for specific assistance, specify rules defining the purposes for which available state enhanced 911 funding may be expended, Efforts to modernize their (counties) existing enhanced 911 emergency communications systems; and Enhanced 911 operational costs. RCW 38.52.540 further specifies that “Moneys in the (state E911 fund) account must be used only to support the statewide coordination and management of the enhanced 911 system, for the implementation of wireless enhanced 911 statewide, for the modernization of enhanced 911 emergency communications systems statewide, and to help supplement, within available funds, the operational costs of the system, including adequate funding of counties to enable implementation of wireless enhanced 911 service and reimbursement of radio communications service companies for costs incurred in providing wireless enhanced 911 service pursuant to negotiated contracts between the counties or their agents and the radio communications service companies”. Additionally, “the state enhanced 911 coordinator, with the advice and assistance of the enhanced 911 advisory committee, is authorized to enter into statewide agreements to improve the efficiency of enhanced 911 services for all counties and shall specify by rule the additional purposes for which moneys, if available, may be expended from this account”.

During calendar year 2015, the State of Washington expended funds to provide the statewide Emergency Services IP Network (ESInet), county 911 operational and equipment replacement/modernization costs, statewide training programs for telecommunicators, statewide 911 planning and collaboration, a third-party cybersecurity assessment of the statewide 911 system, and contracted legal assistance in the solicitation of a new statewide NG911 network.

Operational funding provides assistance to qualifying local jurisdictions for the operation of county and state primary PSAPs including: Salary and benefit support for telecommunicators, county 911 coordinators, MSAG, Mapping/GIS, Information Technology, and public education; PSAP call-taking hardware / software maintenance; and modernization/replacement of authorized PSAP equipment to NG911 standard.

Statewide training programs include: Telecommunicator training (basic and advanced), PSAP supervisor, Telecommunicator Emergency Response Team (TERT), Certified training officer (CTO) program, and TTY/TDD/Text-to-911 instruction; Funding to counties to support local telecommunicator training programs, county 911 coordinator training and national conference participation, and CTO trainer salary reimbursement.

**2. Please identify the allowed uses of the collected funds. *Check all that apply.***

Type of Cost	Yes	No
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<b>Operating Costs</b>	Lease, purchase, maintenance of customer premises equipment (CPE) (hardware and software)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	Lease, purchase, maintenance of computer aided dispatch (CAD) equipment (hardware and software)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	Lease, purchase, maintenance of building/facility	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>Personnel Costs</b>	Telecommunicators' Salaries	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	Training of Telecommunicators	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>Administrative Costs</b>	Program Administration	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	Travel Expenses	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>Dispatch Costs</b>	Reimbursement to other law enforcement entities providing dispatch	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	Lease, purchase, maintenance of Radio Dispatch Networks	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>Grant Programs</b>		<input checked="" type="checkbox"/> If YES, see 2a.	<input type="checkbox"/>
<b>2a. During the annual period ending December 31, 2015, describe the grants that your state paid for through the use of collected 911/E911 fees and the purpose of the grant.</b>			
The state provides operational funding grants to smaller counties that do not collect sufficient local 911 excise tax revenues to support a basic level 911 program. These grants provide for salaries, equipment, maintenance, and training funds.			

**F. Description of 911/E911 Fees Collected**

<b>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.</b>		
<b>Service Type</b>	<b>Fee/Charge Imposed</b>	<b>Jurisdiction Receiving Remittance</b>

		<i>(e.g., state, county, local authority, or a combination)</i>
Wireline	\$.25 state / \$.70 county per month	Combination of state and county
Wireless	\$.25 state / \$.70 county per month	Combination of state and county
Prepaid Wireless	\$.25 state / \$.70 county per retail transaction	Combination of state and county
Voice Over Internet Protocol (VoIP)	\$.25 state / \$.70 county per month	Combination of state and county
Other		

2. For the annual period ending December 31, 2015, please report the total amount collected pursuant to the assessed fees or charges described in Question F 1.

Service Type	Total Amount Collected (\$)
Wireline	State = \$4,000,070 Counties= \$11,395,554
Wireless	State = \$15,382,384 Counties = \$42,511,827
Prepaid Wireless	State = \$2,551,640 Counties = \$6,905,032
Voice Over Internet Protocol (VoIP)	State = \$3,079,479 Counties = \$8,616,974
Other	n/a
<b>Total</b>	State = \$25,016,074 Counties = \$69,429,387 Combined Total = \$94,445,461

2a. If an amount cannot be provided, please explain why.

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**3. Please identify any other sources of 911/E911 funding.**

PSAP customer agency user fees / local government general funds.
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Question	Yes	No
<p><b>4. For the annual period ending December 31, 2015, 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.</b></p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p><b>4a. If YES, please describe the federal, state or local funds and amounts that were combined with 911/E911 fees.</b></p>		
<p>While the exact amount is unknown, all local PSAP jurisdictions contribute additional local funds to augment State and Local E911 excise taxes, in covering the costs of 911 statewide. It is estimated that on average statewide 15% of the actual cost of providing Washington State approved 911 activities comes from these local sources. In many cases this comes from local government general use funds or individual agency user fees. In addition, Washington State Patrol operates 4 Primary and 4 Secondary PSAPs using some funding from their direct budget.</p>		

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	20%
Local 911 Fees	65%
General Fund - State	0%
General Fund - County	15%
Federal Grants	0%
State Grants	0%

**G. Description of Diversion or Transfer of 911/E911 Fees for Other Uses**

Question	Yes	No
<p><b>1. In the annual period ending December 31, 2015, were funds collected for 911 or E911 purposes in your state or jurisdiction made available or used solely for the purposes designated by the funding mechanism? <i>Check one.</i></b></p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p><b>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 911 or E911 funds were made available or used.</b></p>		
<p><b>Amount of Funds (\$)</b></p>	<p><b>Identify the non-related purpose(s) for which the 911/E911 funds were used. <i>(Add lines as necessary)</i></b></p>	
<p>*</p>	<p>Washington State Law sets forth the purposes for which Washington's 911 excise tax funds may be expended. The Revised Code of Washington (RCW) and the Washington Administrative Code (WAC) when taken as a whole create a de facto line between "Call-taking" and "Dispatch". State 911 dedicated funds are to be used only in support of call-taking functions (said differently, to get the 911 call from the call-maker to the call-taker) whereas; "County 911 dedicated funds" are allowed to support specific "dispatching" functions.</p> <p>With regard to state 911 dedicated funds, RCW chapter 38.52.540 specifies: "(1) The enhanced 911 account is created in the state treasury. All receipts from the state enhanced 911 excise taxes imposed by RCW 82.14B.030 must be deposited into the account. Moneys in the account must be used only to support the statewide coordination and management of the enhanced 911 system, for the implementation of wireless enhanced 911 statewide, for the modernization of enhanced 911 emergency communications systems statewide, and to help supplement, within available funds, the operational costs of the system, including adequate funding of counties to enable implementation of wireless enhanced 911 service and reimbursement of radio communications service companies for costs incurred in providing wireless enhanced 911 service pursuant to negotiated contracts between the counties or their agents and the radio communications service companies. <b><u>For the 2013-2015 and the 2015-2017 fiscal biennia, the account may be used for a criminal history system upgrade in the Washington state patrol and for activities and programs in the military department.</u></b> A county must show just cause, including but not limited to a true and accurate accounting of the funds expended, for any inability to provide</p>	

	<p>reimbursement to radio communications service companies of costs incurred in providing enhanced 911 service. (2) Funds generated by the enhanced 911 excise tax imposed by RCW 82.14B.030(5) may not be distributed to any county that has not imposed the maximum county enhanced 911 excise tax allowed under RCW 82.14B.030(1). Funds generated by the enhanced 911 excise tax imposed by RCW 82.14B.030(6) may not be distributed to any county that has not imposed the maximum county enhanced 911 excise tax allowed under RCW 82.14B.030(2). (3) <b>The state enhanced 911 coordinator, with the advice and assistance of the enhanced 911 advisory committee, is authorized to enter into statewide agreements to improve the efficiency of enhanced 911 services for all counties and shall specify by rule the <u>additional purposes</u> for which moneys, if available, may be expended from this account.</b></p> <p>During calendar year 2015, no state enhanced 911 excise taxes were expended for any other purpose than that prescribed by RCW 38.52.540.</p>
\$5,882,974	In support of the Washington Military Department activities and programs.
\$134,211	In support of the Washington State Patrol upgrades to the state criminal history system.

**H. Oversight and Auditing of Collection and Use of 911/E911 Fees**

Question	Yes	No
<p><b>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.</b></p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p><b>1a. If YES, provide a description of the mechanisms or procedures and any enforcement or other corrective actions undertaken in connection with such auditing authority, for the annual period ending December 31, 2015. (Enter "None" if no actions were taken.)</b></p>		
<p>The State E911 Coordinator's Office through its county grant programs, regularly audits uses of county and state 911 excise tax funds, as they are the basis for the award amounts of the grants. Additionally, the Office of the State Auditor conducts routine audits of all entities, including the use of 911 funds.</p> <p>No actions were taken during calendar year 2015. Minor errors in grants accounting were corrected during the course of the year.</p>		

Question	Yes	No
<p><b>2. Does your state have the authority to audit service providers to ensure that the amount of 911/E911 fees collected from subscribers matches the service provider's number of subscribers? Check one.</b></p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p><b>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, 2015. (Enter "None" if no actions were taken.)</b></p>		
<p>The Washington Department of Revenue conducts periodic audits of service provider excise tax collections for accuracy. No reported actions were taken during this period.</p>		

**I. Description of Next Generation 911 Services and Expenditures**

Question	Yes	No
<b>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.</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>1a. If YES, in the space below, please cite any specific legal authority:</b>		
<p>Washington Administrative Code 118-66-030 (25) includes “modernization to next generation 9-1-1 systems” as part of the “Enhanced 9-1-1 emergency communications system”. Additionally, WAC 118-66-050 (3) (ii) lists “NG9-1-1 network” as an authorized expense.</p>		

Question	Yes	No
<b>2. In the annual period ending December 31, 2015, has your state or jurisdiction expended funds on Next Generation 911 programs? Check one.</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>2a. If YES, in the space below, please enter the dollar amount that has been expended.</b>		
<b>Amount</b> <b>(\$)</b>	<p>The state expended <b>\$15,037,422</b> on Next Generation 911 programs in the annual period ending December 31, 2015. No data available on individual county NG911 program expenditures made from locally collected 911 excise tax funds.</p>	

3. For the annual period ending December 31, 2015, please describe the type and number of NG911 Emergency Service IP Network(s) (ESInets) that operated within your state.					
Type of ESInet	Yes	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	<input checked="" type="checkbox"/>	<input type="checkbox"/>	63	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Local (e.g., county) ESInet	<input type="checkbox"/>	<input checked="" type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
c. Regional ESInets	<input checked="" type="checkbox"/>	<input type="checkbox"/>	[If more than one Regional ESInet is in operation, in the space below, provide the total PSAPs operating on each ESInet]	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Name of Regional ESInet: <b>U.S. Navy</b>			1	<input checked="" type="checkbox"/>	<input type="checkbox"/>

4. Please provide a description of any NG911 projects completed or underway during the annual period ending December 31, 2015.

Washington State continued to replace analog 911 telephone equipment in the state's 54 primary PSAPs with NG911 phone systems. A total of 10 primary PSAPs were upgraded during the calendar year. In 2015, the State of Washington continued with a third-party cybersecurity assessment of the state-wide ESInet, and began solicitation of a new ESInet for Washington State.

Question	Total PSAPs Accepting Texts
<b>5. During the annual period ending December 31, 2015, how many PSAPs within your state implemented text-to-911 and are accepting texts?</b>	6
Question	Estimated Number of PSAPs that will Become Text Capable
<b>6. In the next annual period ending December 31, 2016, how many PSAPs do you anticipate will become text capable?</b>	Estimated a total of 23 PSAPs will become text capable in 2016.

**J. Description of Cybersecurity Expenditures**

Question	Check the appropriate box		If Yes, Amount Expended (\$)
<b>1. During the annual period ending December 31, 2015, did your state expend funds on cybersecurity programs for PSAPs?</b>	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	\$153,356

Question	Total PSAPs
<b>2. During the annual period ending December 31, 2015, how many PSAPs in your state either implemented a cybersecurity program or participated in a regional or state-run cybersecurity program?</b>	54

Question	Yes	No	Unknown
<b>3. Does your state or jurisdiction adhere to the National Institute of Standards and Technology <i>Framework for Improving Critical Infrastructure Cybersecurity</i> (February 2014) for networks supporting one or more PSAPs in your state or jurisdiction?</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**K. Measuring Effective Utilization of 911/E911 Fees**

- 1. 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.**

Washington State is, and has been, a national leader at the forefront of the 911 technology evolution. Since 1998, Washington State has dedicated hundreds of millions of state taxpayer dollars for the provision and enhancement of the statewide 911 system. In 2009, Washington State built the first, and most comprehensive, state-wide Emergency Services IP network (ESInet) in the nation. In 2011, the state legislature approved an increase to the state and county 911 excise tax rates for the express purpose of evolving to Next Generation 911 on a state-wide basis. In the period from 2012 through 2015 alone, the Washington State E911 Coordination Office has expended \$46,304,261 on NG911 modernization from state coffers. This number does not include the millions of dollars in dedicated county 911 excise tax funds dedicated to this same purpose.

Washington State is far into the process of completing a statewide, standards-based, all-IP emergency communications enterprise which will allow for voice and other evolving communications (i.e. Text and photos) between any 911 caller and the appropriate Public Safety Answering Point (PSAP).

Our statewide NG911 enterprise is continuing to enhance the existing E/NG911 system to create an even faster, more flexible, resilient, geodiverse and scalable system which will allow us to match pace with the evolving communications technologies used by our citizens.

The vision for Washington's Statewide NG911 enterprise is to enable citizens in need of emergency assistance to transmit photos or other forms of data/applications to our PSAPs in addition to the traditional voice call or sending a text message. This could include photos of an accident scene, video from an emergency incident, or medical information, all of which will greatly aid our 911 professionals in getting the assistance a caller needs expeditiously.

Moreover, when complete Washington State's 911 enterprise will have the tools needed for more effective and efficient response, and an increased ability to interoperate with other 911 centers in the event of a major disaster.

Lastly, on the topic of "diversion" of 911 funds and the notion of withholding potential federal assistance funds from states who have "diverted" funds, we strongly endorse rewarding states who are funding their 911 programs as opposed to using a "punishment" model. To paraphrase a fellow state 911 administrator, 'We support using a carrot rather than an orange stick'.

We believe it important to look at a state's expenditures (and results) rather than merely looking at whether or not a state made a decision to repurpose any funds at some time in the past.

Using "diversion" as the sole criteria for eligibility of potential federal grants ignores the fact that a state with a rapidly advancing 911 enterprise might be deemed ineligible (regardless of the total dollars invested in modernization towards NG911, or where that state is in progress towards true NG911 capability), whereas a state which has chosen not to dedicate much, or any, state taxpayer funds for 911 would be rewarded with federal assistance so long as they hadn't 'diverted'.

What we need is the tools to encourage our local and state legislators to *further* invest in 911, rather than a threat of future ineligibility of potential federal funds.