

NC Police Chief's Objections to the Rules

Brandon,

I will pass this on to Laura and Richard.

I am not sure we are in a position to do anything about them now until we get to the Public Hearing portion of the Rules process.

Thanks, Dave

Dave Corn

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From: Brandon Zuidema [<mailto:bzuidema@garnernc.gov>]
Sent: Thursday, June 18, 2015 6:27 PM
To: Corn, David A
Subject: RE: NC 911 Board Standards Committee Meeting

David –

I wanted to follow-up to let you (and whomever it would be appropriate to share it with) that there are some concerns from Chiefs that operate PSAPs related to some the language in the rules. The following is a summary of those concerns; in general, we feel that there are some specifics that do not work from a “one size fits all” approach that is not practical.

I'd like to talk through these at the meeting if possible.

09 NCAC 06C.020 – Telecommunicator Qualifications and Training

(b)(1) There shall be sufficient telecommunicators available to effect the prompt receipt and processing of emergency 911 calls needed to meet this Rule.

- Related to PSAP 911 Call Operating Procedures, this language essentially mandates staffing levels without providing funding for doing so.
- While this is certainly a reasonable goal for most if not all PSAPs, there will be a myriad of factors that could influence the ability to answer calls 90% of the time in under 10 seconds as required in the rules.

(b)(3) Telecommunicators shall not be assigned any duties prohibiting them from immediately receiving and processing emergency 911 calls for service in accordance with the time frame specified in the Operating Procedures.

- This seems subjective in terms of defining what type of duties might be referred to
- Many PSAPs have their staff monitoring cameras, greeting visitors, etc. I don't believe it is realistic to use this language. Perhaps something more along the line of ensuring that receiving and processing 911 calls is the employee's primary responsibility and/or they have the ability to set aside or forego any other assigned duties in order to immediately receive and process 911 calls?

09 NCAC 06C.020 – PSAP 911 Call Operating Procedures

(a)(1) Ninety (90) percent of emergency 911 calls received on emergency lines shall be answered within ten (10) seconds, and ninety-five (95) percent of emergency 911 calls received on emergency lines shall be answered within twenty (20) seconds. Compliance with (d)(1) shall be evaluated monthly using data from the previous month.

- This essentially mandates personnel without providing funding. This will not always be possible (or practical) for a variety of reasons, including emergent or standing staffing issues. Focusing strictly on these performance measures can result in officer safety issues if PSAPs are required to focus on answering 911 calls over all other responsibilities. While this is a reasonable goal, there will be cases where it needs to be at the discretion of the PSAP director.
- I would suggest we consider “should” versus “shall” or some similar language that indicates that this is a goal but is not always attainable given funding, vacancies, etc.
- What is (d)(1) that this refers to?

09 NCAC 06C.0207 – PSAP Operations and Management

(a)(8) At least one supervisor or lead qualified and trained as a telecommunicator shall be available to respond immediately at all times 24 hours per day, 7 days per week, 52 weeks per year

- Could we clarify the definition of “immediately”? Would a police supervisor with appropriate training/background meet this standard? I don't believe it's practical (or necessary) to have it be someone on site.

09 NCAC 06C.0208 – PSAP Facilities

(a)(7) PSAPs shall be designed to accommodate the staffing level necessary to operate the center as required by the Rules set herein.

(a)(8) The design of the PSAP shall be based on the number of personnel needed to handle peak workloads as required by the Rules set herein

- There is some question regarding the interpretation of this in terms of providing equipment for positions that may not be staffed by a given PSAP. We would prefer language indicating the PSAP being designed to provide adequate / necessary equipment for all personnel on-duty.