

Adams, Ron

From: Moskowitz, Lloyd [lmoskowitz@gcps.org]
Sent: Tuesday, April 26, 2011 3:38 PM
To: SVC_ITS.911comments
Subject: 911 Standards Suggestions

Suggest the inclusion in yellow:

8 2.2 Official Definitions.

9 2.2.1 Public Safety Answering Point (PSAP). As defined in GS 62A-40(18): The Public Safety
10 Agency that receives an incoming 911 call and dispatches appropriate Public Safety Agencies to respond
11 to the call, **or routes the call to an appropriate Secondary PSAP**. See 47 CFR 20.18(b) for basic 911 services, defined
as:

Question the section in red, since Secondary PSAPs do not currently receive funding.

16 3.1 General.

17 3.1.1 Any Primary Public Safety Answering Point, Backup Public Safety Answering Point, or
18 **Secondary Public Safety Answering Point** that receives funding from the NC 911 Board is required to
19 comply with all NC 911 Board Standards.

Suggest red verbiage be changed to yellow:

20 3.1.2 All equipment, software, and services used in the **daily normal** operation of the Public Safety Answering
21 Point shall be kept in working order at all times.

Would minimum of 2 Telecommunicators and **/or Supervisors** must be available....

6 6.3.2 After January 1, 2013 a minimum of two (2) Telecommunicators must be available at all times 24
7 hours per day, 7 days per week, 52 weeks per year to immediately receive and process emergency calls.

Lloyd Moskowitz - Director

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Adams, Ron

From: Doug Workman [Doug.Workman@townofcary.org]
Sent: Thursday, April 28, 2011 9:27 AM
To: SVC_ITS.911comments
Subject: Cary 911 Standards Concerns

3.1.4.3.1 The plan shall include the ability to reroute incoming emergency call traffic to the backup center
4 and to process and dispatch emergency calls at that backup center. **Are they expecting an automatic reroute?**

6 3.1.5 The Public Safety Answering Point shall be capable of continuous operation long enough to
7 enable the transfer of operations to the Backup Public Safety Answering Point in the event of an
8 emergency in the Public Safety Answering Point or in the building that houses the Public Safety
9 Answering Point. **If a tornado hits your primary building or equipment it may take a short amount of time to get everything transferred and get
personnel to the other locations. Also, let's say you have a complete failure in your backup equipment. You may not have that continuous operation.**

18 3.1.10 Damage Control Plan. There shall be a management approved, written, dated, and annually tested
19 damage control plan that is part of the CEMP. **I think Damage Control should be defined in the definitions section.**

20 3.1.11 Penetrations into the Public Safety Answering Point shall be limited to those necessary for the
21 operation of the center. **Is this really needed in the standards? This should be governed by the director of the center.**

29 5.1.1: **Our systems are maintained by an employee of TS.**

9 5.1.4 All equipment shall be accessible to the PSAP for the purpose of maintenance. **If a PSAP is using a hosted solution for any system and they
have a maintenance contract with the provider, why does the PSAP need accessibility to the equipment?**

13 5.2.1 Telecommunicators and Supervisors shall be certified in the knowledge, skills, and abilities
14 related to their job-related function. **If you are going to say certified, you should define what certified means.**

31 5.3.3 Where communications systems, computer systems, staff, or facilities are used for both
32 emergency and non-emergency functions, the non-emergency use shall not degrade or delay emergency
33 use of those resources. **In my opinion this is too vague. How can you tell if an agency is complying with this?**

13 5.4.2 The Public Safety Answering Point is required to provide pre-arrival medical protocols as set
14 forth by the North Carolina Office of Emergency Services, Health and Human Services in the initial call
15 reception or by the responsible EMS provider on behalf of the primary answering point. **I thought this was removed? The ability to perform EMD
is governed by the Medical Director and not the PSAP itself. If the medical director pulls the PSAPs ability to perform EMD, then we would not
meet this standard at no fault of ours.**

16 5.4.3 For law enforcement purposes, the PSAP shall determine time frames allowed for completion of
17 dispatch. **If you're not going to set a specific time, then why have it as a standard?**

5.4.4.1 The PSAP shall transfer calls for services as follows: **Should the standards identify when a call should be transferred? Misroute, EMS, etc?**

28 5.4.6 An indication of the status of all emergency response units shall be available to appropriate
29 Telecommunicators at all times. **How will this be accomplished with mutual aid calls between agencies that have separate systems?**

30 5.4.7 Records of the dispatch of emergency response units to call for services shall be maintained and
31 shall identify the following: **How will we get all the required info from mutual aid units responding?**

12 5.4.10 Standard operating procedures shall include but not be limited to the following: **Some of these are vague.**

22 5.4.11 Every Public Safety Answering Point shall have a comprehensive regional emergency
23 communications plan as part of the CEMP. **What does the standard want to see in a comprehensive regional emergency communications plan?
That is too broad to and can be interpreted in many different ways.**

13 5.5.2 All timekeeping devices in the Public Safety Answering Point shall be maintained within ± 5
14 seconds of the main recordkeeping device clock. **This is going to require us to spend some funding to attach systems to one time source.**

25 6.3.1 At least two 911 call delivery paths with diverse routes arranged so that no single incident
26 interrupts both routes shall be provided to each Public Safety Answering Point. **We have to have the Backup site to make this happen.**

2 8.4.1 The CAD system should have the capability to allow emergency call data exchange between the
3 CAD system and other CAD systems. **What is the defined data? This is vendor specific. They may have problems getting agencies to comply.**

4 8.4.2 The CAD system should have the capability to allow data exchange between the CAD system and
5 other systems. **Again, what kind of data?**

26 8.6.4 Under all conditions, the CAD system response time should not exceed 2 seconds... **How will this be measured? Venders are unable to provide this data.**

27 8.6.5 The CAD system shall be available and fully functional 99.95% of the time... **Again, this is vender specific and our vender is unable to provide this type of report for our CAD. How will this be measured?**

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Adams, Ron

From: Robinson, Rob L. [Rob.Robinson@rowancountync.gov]
Sent: Thursday, April 28, 2011 5:08 PM
To: SVC_ITS.911comments
Subject: 9-1-1 Standards

I would just like to go on record as saying I am not complaining just making my voice heard. I am under no way shape or form against a Standard. In fact, I think this will be one of the most important documents to come out of the 9-1-1 Board in years. I applaud the Board and the Committee for their hard work on this project.

I do however have serious concerns about Section 8 of this document as it is written.

First you are coping a standard that was written years ago from NFPA standards that has never worked. Has anyone on the committee actually investigated this to determine if ANY county in the state does this?

My first question to the committee is "Translate this section and explain "exactly" how you see this applying to a 9-1-1 Center and what do they have to do to meet these requirements?"

From my experience over the years with ISO ratings, this is an area where they said "no one every gets right" and that no one has....I have even went as far as to contact Jeff Parker with Motorola and they are saying no one does this and if it "could" be done it would be very expensive. SEE BELOW.

Robbie:

Per our telco conversation regarding the proposed North Carolina 911 Board Operating Standards DRAFT section 8, derived from NFPA 1221 ;

Short answer;

No, Link verification of conventional analog (4w/2w) telco circuits is not available as standard feature on any of the Motorola Dispatch products.

Trunking circuits and some ASTRO digital link verification are normally monitored via the trunked system network management system in trunked radio systems.

Longer answer:

Conventional Analog:

Depending on system configuration i.e. remote base , repeater, simulcast this functionality in analog could be possible, but could get complex, especially in simulcast system design with comparators, digital encryption etc...

In theory, guard/status tones could be used for conventional analog circuits, but notching out the guard/status tone frequency at both ends of the radio circuit and for recording logging could pose an ongoing issue with the dispatcher/field user hearing tone bleed through if the system is not properly adjusted..

Also, variations in telco services from the various service providers could cause numerous false alarms and dispatcher frustration.

Digital conventional (ASTRO):

Digital circuits could be easier to monitor using the various loopback tests, that most modems utilize, but again may require the circuit be out of service during the test....

Most digital modems/CSU's have alarm indicators/contacts to indicate link status

If I remember correctly Analog microwave in the past used a pilot tone to verify link connectivity. Most microwave equipment contain external alarm contacts to connect to alarm monitoring equipment.

You could then employ system monitoring hardware such as MOSCAD to detect any analog/digital alarms outputs and route them to a BIM AUX I/O to be displayed on the console position or MOSCAD graphic work station.

The Motorola series of dispatch consoles have internal diagnostic trouble shooting tests that can be run within the dispatch hardware, however the demark point would be at the connection point of any external remote links.

In the trunking world, most links (T1's E1's,DS0's etc.) are monitored via the system network management hardware and error displayed on the network monitoring terminal.

Of course monitoring any links does not ensure that the dispatch has been broadcast over the air , the best way to verify that the dispatch has been transmitted is via a off air monitor receivers or logging recorder.

Hope this helps;

Any questions please feel free to contact me.

Regards

Jeff Parker

Sr. Staff Engineer

Government and Public Safety Engineering

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Although I do praise the committee for it's hard work in preparing this document I would also like to say that I hope the group has done it's homework on all these standards. Anything in this document I hope has been thoroughly researched to determine it can be done, and that vendors are available to make it happen. I would like to also hope the committee would be able to explain to the PSAP EXACTLY how such Standards can be met, along with what options are acceptable.

Again I am 100% behind Standards, just not Standards that are not fully researched, validated, confirmed, and that offer assistance in accomplishing. It is easy to put things down on paper, it is much harder to make them reality!!! And unless I am missing something, this is my point on Section 8. If I am wrong please explain. If not, then this was nothing more than a previous standard that was written, copied and pasted and re-

worded. Standards should be written based on what has been tested and proven to accomplish the goal. I don't feel that is what is going on in Section 8.

Again, thanks for all you are doing!

Rob Robinson, ENP

Director

Rowan County Telecommunications

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Taylor, Richard

From: Bryan, Melonie [mtbryan@pittcountync.gov]
Sent: Wednesday, May 04, 2011 5:45 PM
To: Todd McGee; Taylor, Richard
Cc: Lee, Noel; Tyson, Sam
Subject: FW: NC 911 Board seeking comments on standards for 911 services

Our Communications Manager (Sam Tyson) and our Emergency Management Director (Noel Lee) have reviewed the specifications and have a few areas of concern. While they both agree the standards are not unrealistic, working out of an old building does create limitations such as:

Power requirements - Section 4 I am not sure we have room for a four hour UPS and could actually require another back-up generator.
Security - Section 5.4 The parking distance requirement may not be possible.
Audible alerts or trouble signals - Section 8 Should be addressed by the new radio system but radio system will not be upgraded for 6 months or more.
CAD System - Section 9 Back up system availability

If you need greater detail for your purposes, Sam's email is sjtyson@pittcountync.gov and Noel's is nlee@pittcountync.gov.

MB

Melonie Bryan
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Chief Financial Officer
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From: Todd McGee [<mailto:todd.mcgee@ncacc.org>]
Sent: Tuesday, May 03, 2011 1:49 PM
To: County Managers
Subject: NC 911 Board seeking comments on standards for 911 services

Managers,

We are forwarding this e-mail below from Richard Taylor, the executive director of the N.C. 911 Board. Please contact him if you have any questions.

The North Carolina 911 Board Standards Committee is close to completing their current task of developing operating standards for Primary PSAPs that receive funding from the 911 Board in North Carolina. Prior to making its recommendation to the North Carolina 911 Board, the Standards Committee will conduct a final public meeting for the express purpose of soliciting comments from interested persons on the proposed recommendations.

The next scheduled meeting of the committee is Friday, May 6, 2011 at 10 a.m. in the City Council Chamber of the Raleigh Municipal Building, Avery C. Upchurch Government Complex, 222 W. Hargett Street, Raleigh. Parking is available

in the Raleigh Municipal Deck, which is immediately adjacent to the Municipal Building. The parking deck can be accessed from either McDowell Street from the south and east, and Morgan Street from the north and west.

If you wish to speak (whether in person or via teleconference), please notify me at richard.taylor@nc.gov so you can be added to the list.

If you are unable to attend the meeting in person, teleconference capabilities will be available, again notify me for teleconference connection information.

Also, if you are unable to be present for the meeting in person or via teleconference, written comments are encouraged and will be accepted at the email address: 911comments@its.nc.gov

The current draft of the proposed standards can be found on the 911 Board website at https://www.nc911.nc.gov/pdf/Draft_Operating_Standards.pdf. If you have any questions, please let me know.

Thanks,
Richard Taylor
Executive Director
North Carolina 911 Board
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Todd McGee
Communications Director
North Carolina Association of County Commissioners
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Adams, Ron

From: Alleghany County Manager [manageralc@skybest.com]
Sent: Tuesday, May 03, 2011 4:14 PM
To: SVC_ITS.911comments
Subject: Comments on draft operating standards for E911

Alleghany County has several concerns regarding the proposed "Draft North Carolina 911 Board Operating Standards".

The 1st concern is in regards to the Backup Public Safety Answering Point. Section 3.1.1 states that Backup Public Safety Answering Points are required to comply with all NC 911 Board Standards. My real concern is having to meet the physical requirements of the structure as stipulated in the document. Some examples of my concerns are the backup power requirements, independent HVAC requirements, bullet resistant windows and the means to prevent unauthorized vehicles from approaching the building housing the backup system to a distance of no less that 82 feet. Many of these requirements are going to be difficult to accomplish in our existing PSAPs (especially the 82 feet). Alleghany County does not have existing space that could be modified to meet all of these requirements. If some relief is not given on these requirements for a backup facility then these new Operating Standards are basically requiring us to build a new facility for a back up system that will be rarely used (if at all).

The 2nd major concern is section 6.3.2 requiring a minimum of (2) dispatchers to be available at all times 24 hours per day, 7 days per week, 52 weeks per year to immediately receive and process emergency calls. Alleghany County currently generally has two dispatchers during the day and one at night. Requiring additional staff will be a financial burden on Alleghany County. We feel that we are appropriately staffed at this time.

Finally I also have a concern regarding the physical requirements of the primary PSAP. Section 5.2.2 requiring an independent HVAC system for PSAPs seems to be an overkill. If our current HVAC setup is appropriately heating and cooling the PSAP, then why make us add an additional system when it is not needed? Although I believe our current PSAP could meet most of the other requirements with modifications, the 82 feet vehicle prevention requirement would be difficult to accomplish. Due to our current configuration of our parking lot, we probably could come up with a suitable solution with less distance. If there is not a way to waive this distance requirement, then this provision could cause us to move our primary PSAP. This causes the same issues as above with our backup system. Since we do not have another location available, we would have to build another PSAP.

All of these requirements should have an appeal process that could allow for exceptions.

Thank you for the opportunity to submit my concerns. If there are any questions, please feel free to call or contact me.

Sincerely,
Don Adams
Alleghany Count Manager
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Adams, Ron

From: stpaulsadmin@nc.rr.com
Sent: Tuesday, May 03, 2011 4:28 PM
To: SVC_ITS.911comments
Subject: 911 Funding--from a Small Rural Town's Perspective

The deprivation of funding for small towns, particularly in larger counties, by labeling them "Secondary" PSAPs only marginalizes already impoverished rural towns, while subsidizing the larger centers in County seats.

I am quite certain that many people will die due to inadequate equipment (that small towns do not have the resources to buy) but this does not seem to concern you. Nor do I think you are concerned about public safety as a primary concern.

Therefore, it seems to me that this in part about using taxpayer dollars to buy your (those of you on the Board who are in the telecommunications industry) equipment, as new 911 centers open.

Stuart Turille
Administrator
St. Pauls

Adams, Ron

From: Major Almey Gray [almeyg@darenc.com]
Sent: Wednesday, May 04, 2011 11:28 AM
To: SVC_ITS.911comments
Cc: Robert L. Outten; Dave Clawson; Robert Gately; Talmadge Willis; Lora Nock; Sheriff Doug Doughtie; Chief Deputy Steve Hoggard; Captain Jeff Deringer; Captain Charlie Nieman; Barefoot, Ronnie; Amy Elkins; Beth Edens; Debbie Remaley; Eileen Mckenna; Erin Putnam; Holly Butler; Jessica Phillips; Joel Ballance; Kimberly Twiddy; Lacy Chronister; Merry Kocian; Nancy Stieh; Neries Sullivan; Pam Meekins; Rebecca Cook; Regina Etheridge; Jessica Reynolds; Richard Lewis; Sara Finch; Shelley Mills; Sherian Swindell; Suzanne Odom; Suzie Ashley; Talmadge Willis
Subject: Proposed 911 Legislation Concerns and Comments from Dare County
Importance: High

[Comments, Concerns from Dare County:](#)

Introduction:

Dare Central Communications is under the Dare County Sheriff's Office and we are located on the second floor of the Dare County Detention Center. Emergency Management is also located with us on the second floor. We are in a Category 5 building, as we are located on the eastern-most coast of North Carolina. We are blessed to have this facility and we are in a new Communications Center within this building that we just moved into in November with the latest equipment, grounding, UPS, generators, ect. We just finished building out a P25 Trunked 800 mhz Motorola Astro Public Safety Radio System for all EMS, Fire, Law Enforcement and Ocean Rescue in Dare County. We did try to build another building for Communications and Emergency Management. This was with the land and other resources, parking lots, ect., donated. The cost to Dare County was still 4 million dollars just for the building, not including the equipment for the Communication Center. Will 911 Grant money buy the land and build the building that our hurricane building codes require, as well as pay for the equipment and utilities to meet the mandated provisions proposed by legislation. We are one of the more blessed counties in North Carolina, but even we cannot meet the requirements below, without significant costs for land, building, and equipment. How could the poorer, smaller counties? Under 3.1.4 below-legislation mandates a backup center (which we agree we need) but do not believe it should be mandated, with such stringent parameters that no one could afford, unless, in fact they did consolidate counties (in our area) and for geographical, political and staffing reasons, we find unrealistic. Dare County has staffing for 24 telecommunicators (one is administrative assistant, one is Systems Administrator, and one is Assistant Director/Training Office). We staff for (5) telecommunicators on three shifts and (6) telecommunicators on one shift. No county around Dare even comes close. We have 19 fire departments, (1) large Sheriff's Office, (6) local police departments, National Park Service, County EMS and (6) Ocean Rescue entities that we dispatch in season. How do you staff for "peak workload" the 300,000 that are in Dare County from Memorial Day until Labor Day and have the space and equipment to meet that demand along with another county or two, (Tyrrell, Washington, Hyde, Currituck)? We are on 800 mhz and only Hyde is on 800 mhz and they are on the States VIPER System.

29 3.1.4 Each Public Safety Answering Point shall maintain a Backup Public Safety Answering Point or
30 have an arrangement for backup provided by another Public Safety Answering Point. Agencies are
31 **encouraged to pool resources and create regional backup centers.**

32 3.1.4.1 The Backup Public Safety Answering Point shall be capable, when staffed, of performing the
33 emergency functions performed at the primary Public Safety Answering Point.

Well you say we can apply for a Grant from the 911 Board, but your mandates for construction, everything from how the power should be run (we have no control over Virginia Power), to closing of air intakes, to blast proof buildings and bullet proof glass, are the wishes of someone that does not have to worry about how to pay for these things.

As a condition for receipt of a grant from the North Carolina 9-1-1 Board for any type of new construction or for a renovation of an existing structure and/or facility incorporated into the construction agreement(s) shall be the following requirements.

5.1.1 The requirements in Section 4 Construction, shall apply only to new construction and construction renovations funded by the North Carolina 911 Board. Existing Public Safety Answering Point facilities are encouraged to meet these standards, but are not required to meet these standards.

We are located in a detention facility now, with Emergency Management- a public office, with parking just outside our building. If we were a new building- under these guidelines- we would have to be "blast proof." Again, land is a premium in Dare County. Unless you have a designated parking lot for your employees with key card or some type of security access, you would have to have someone employed to screen and allow the public near or into the building.

5.4.6 Means shall be provided to prevent unauthorized vehicles from approaching the building housing the Public Safety Answering Point to a distance of no less than 82 ft (25 m).

5.4.7 As an alternative to prevent unauthorized vehicles, unauthorized vehicles shall be permitted to approach closer than 82 ft (25 m) if the building has been designed to be blast resistant.

Under Operating Procedures: The service rendered should be evaluated by the people they serve, who pay the taxes. We have OSSI/Sungard CAD. If we have the capability of determining the information below- I don't need my Systems Administrator wasting his time determining if we are in compliance- although I know that we are, just to prove it to someone. He has many other more important things to do with his time.

6.4.1 Ninety (90) percent of emergency calls received on emergency lines shall be answered within ten (10) seconds, and ninety-five (95) percent of emergency calls received on emergency lines shall be answered within twenty (20) seconds.

6.4.1.1 Compliance with 5.4.1 shall be evaluated monthly using data from the previous month.

You write of the requirement for a "Comprehensive Regional Emergency Communications Plan." What is the "region." In Dare County we are very familiar with Emergency Management plans. Jessica Phillips, Administrative Assistant in Communications and Emergency Management has never heard of a "Comprehensive Regional (?) Emergency Communications Plan. We have many plans, which we practice regularly- do we need another one?"

6.4.11 Every Public Safety Answering Point shall have a comprehensive regional emergency communications plan as part of the CEMP.

7.3 Circuits/Trunks:

7.3.1 At least two 911 call delivery paths with diverse routes arranged so that no single incident interrupts both routes shall be provided to each Public Safety Answering Point.

Who will mandate this to CenturyLink and test it so that it works? 911 lines are cut several times a year in various places in Dare County from someone digging? We are fortunate if we just lose and exchange, but if fiber optic is involved with lose everything as fiber loss is in both directions. This has been an ongoing issues for years. CenturyLink needs to determine a solution and they need to be mandated to ensure there is no loss of 911 trunks. We have no authority over CenturyLink or any utility for that matter.

7.4.1 Public Safety Answering Points shall maintain a written plan as part of the Comprehensive Emergency Management Plan (CEMP) for rerouting incoming calls on 911 emergency lines when the center is unable to accept such calls.

Audible as well as visual actuators "located at a constantly attended location." The only place like that is the 911 Communications Room. Don't they have enough audible (911 and administrative line ringing) actuators and visual indicators (CAD) to tend to, and now we have Emergency Buttons on all of our officers new 800 radios going off accidentally?

8.3.1 Trouble signals shall actuate an audible device and a visual signal located at a constantly attended location.

8.3.2 The audible alert trouble signals from the fault and failure monitoring mechanism shall be distinct from the audible alert emergency alarm signals.

(2) Detected faults and failures in the radio communications system shall cause audible or visual indications to be provided within the Public Safety Answering Point.

Is a secondary CAD (OSSI/Sungard) simply as a backup- going to be an allowed expense for Dare County 911? Where do we install it?

9.2 Secondary Method.

9.2.1 A secondary method shall be provided and shall be available for use in the event of a failure of the CAD system.

9.4 Emergency Call Data Exchange.

9.4.1 The CAD system should have the capability to allow emergency call data exchange between the CAD system and other CAD systems.

9.4.2 The CAD system should have the capability to allow data exchange between the CAD system and other systems.

Talmage Willis is my Systems Administrator. He has been in Dare County Communication 22 years. He says that he is not familiar with a system that does what you mandate below. At one time we had CAD system with a two servers that were linked to a "cluster" which turned out to be a good name for it, because it was nothing but problems and we had to separate it.

9.8 Redundancy

9.8.1 The failure of any single component shall not disable the entire system.

9.8.1.1 The Computer Aided Dispatch system shall provide switchover in case of failure of the required system component(s).

9.8.1.2 Manual intervention by Telecommunicators or others shall not be required.

9.8.1.3 Notwithstanding automatic switchover, the Computer Aided Dispatch system shall provide the capability to manually initiate switchover.

9.8.1.4 Computer Aided Dispatch Systems that utilize server and workstation configuration shall accomplish automatic switch over by having a duplicate server available with access to all the data necessary and required to restart at the point where the primary server stopped.

Who, what system does this? Again, I repeat on more audible and visual alarms.

9.8.2 Monitoring for Integrity

9.8.2.1 The system shall continuously monitor the Computer Aided Dispatch interfaces for equipment failures, device exceptions, and time-outs.

9.8.2.2 The system shall, upon detection of faults or failures, send an appropriate message consisting of visual and audible indications.

We are not familiar with these kinds of records or record keeping equipment.

11.1.1 Complete records to ensure operational capability of all 911 system functions shall be maintained for a minimum of three years.

More time, more manpower, who will fund it?? We can't afford the telecommunicators we are supposed to have according to NFPA 1221 standards.

11.5.1 Call and dispatch performance statistics shall be compiled and maintained.

24 11.5.2 Statistical analysis of emergency call and dispatch performance measurements shall be done
25 monthly and compiled over a one (1) year period.

Finally: Again, if time and manpower were not an issue...

11.6 Maintenance Records.

5 11.6.1 Records of maintenance, both routine and emergency, shall be kept for all emergency call
6 receiving equipment and emergency call dispatching equipment.

7 11.6.2 All maintenance records shall include the date, time, nature of maintenance, and repairer's name
8 and affiliation.

Conclusion: This legislation would limit PSAPs to large consolidated centers, which is probably the intent, and take all local control away from the tax payers and those who they elect, to ensure their safety is utmost priority.

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Adams, Ron

From: Tyson, Sam [sjtyson@pittcountync.gov]
Sent: Wednesday, May 04, 2011 12:34 PM
To: SVC_ITS.911comments
Subject: Comments

We have enough alarms (telephone lines ringing, generator alarms, telephone system, and fire alarm) without having to keep adding more to the communications room.

We have enjoyed our CAD system designed and written in house, we can make some changes to our system. It does not talk to other CAD systems, you will require us to talk with other CAD systems to allow data exchange.

Monitoring for Integrity - I am not familiar with anything that let me know of failures or exceptions.

Security - A building that can withstand a blast, have bullet proof glass, or restrict access to no closer than 82 ft. Is this the entire building or just the Communications Center?

Sam Tyson
Communications Manager
Pitt County

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Gates County Emergency Management

Emergency Management
Fire Marshal
E-911



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Gatesville, NC 27938

Director - Billy Winn Office 252-357-5569 Fax 252-357-4131 bwinn@gatescountync.gov

To: NC 911 Board
From : Gates County 911
Date: May 4, 2011
Re: Proposed Requirements

Gates County is a quaint, rural , often overlooked, County in Northeast NC that provides 911 service to approximately 11,000 citizens on a daily basis. Gates County is a bedroom community for workers in southeast Virginia, meaning most of our workforce travels out of County actually out of State to make a living. There is very little industry outside of agriculture therefore our tax base is limited to homeowner's property taxes. Although our 911 center is not state of the art, not fully animated with bells and whistles, lights and cameras, It works for us and by my accounts that is what matters, providing the service to the citizens of Gates County. There are many things that the proposed requirements would burden Gates County but first of all we only staff one dispatcher per shift. Centers from bigger towns or metro areas are blessed with 4,5,6,25 dispatchers per shift but cursed with the need to have that many to handle the 911 call volumes. We have times when our staff is taxed and we have addressed those issues with policies and procedures. We feel like we are handling our 911 center the best way for our citizens. There are often times when the 911 phones or the administration lines don't ring for an entire 12 hour shift. The proposed minimum staffing requirements would burden Gates County with a \$300,000 annually recurring employment bill, for employees that we don't need but are required to have to continue receiving funds from the 911 board. It has been suggested to the point of disgust that "the small centers should just consolidate". Gates County was part of a consolidated 911 center for 15 years. I said was, because it didn't work. I truly believe that a consolidated, regional system has some merit on paper and I believe that the technology is available for something like that to succeed at some level. However I do not believe that it should be the responsibility of this Board to deny small counties, that are functioning successfully, access to fees collected from their taxpayers because our centers do not fit into some "template of success". I urge you to consider the plight of all of the Counties in North Carolina before any decisions are made that would force tax burdens down to our citizens.



Adams, Ron

From: Melvin Proctor [melvinp@cityofkm.com]
Sent: Thursday, May 05, 2011 11:16 AM
To: SVC_ITS.911comments
Subject: New Dispatch Center Rules

Good Morning,

I'll make this short. In reference to the rule 24hours 7 days a week, 365 days a year, I think it would be better to have a study by each PSAP with regards to the call volume and then if the call volume and time standard is not being met, then there should be a requirement for the 2 dispatch rule. I have monitored the call volume and checked the time standards in the new rules and found that were are compliant now without 2 dispatchers on duty all the time. I think this requirement places too much a burden on smaller PSAPS and can be better managed by the times standards in the new rules and by the administration of the PSAPS.

Thank You for allowing me to voice my concerns,
Chief Melvin Proctor
Kings Mountain Police Department

Adams, Ron

From: David McNeill [david.mcneill@transylvaniacounty.org]
Sent: Thursday, May 05, 2011 2:44 PM
To: SVC_ITS.911comments
Cc: Artie Wilson
Subject: Comments on Draft Operating Standards

To: North Carolina 911 Board Members

From: David McNeill, Transylvania County Operations Manager

Kevin Shook, Transylvania County 911 Communications Director

Subject: Comments on Draft Operating Standards

We have reviewed the draft dated April 14, 2011 and would like to submit the following comments for your consideration.

1. Overall, we are in support of a minimum standard for operating a PSAP. However, the document as written exceeds what we believe to be the minimum needs for some local governments and will create a financial burden unless the Board agrees to include grant funds to assist counties in achieving the standards. Specifically, we take issue with some of the building construction requirements outlined in the document (5.4.6, 5.4.7, 5.2.3, 5.3.4, 5.4.5.1, 5.4.5.2). We believe the construction requirements will make new construction and remodel cost prohibitive and in some cases exceeds what we believe to be reasonable measures to ensure the security of the facility.
2. While we believe that pre-arrival medical instruction are important, the requirement to force local governments to implement this program will create initial and on going costs that in our case will be difficult to achieve in the current economic climate. This requirement must include a mechanism from the 911 Board to assist in funding this requirement. It is also important to note that the implementation date of July 2012 leaves very little time to review options available to provide this service, incorporate medical direction, and train staff. It is also important to note that many local governments are in the later stages of the next fiscal year budget process and does not have funding included to meet this standard. This means that the 911 Board will need to provide the funding in order for us to meet the deadline of July 2012.
3. In general, it would be helpful to local governments if the implementation was phased in to allow us to plan for and implement the standard without creating undue hardship in man power and funding.
4. The standard requires writing several plans. We would like for the 911 Board to provide guides or sample plans that can be used by local governments when writing the plan so we can ensure that we meet the intent of the 911 Board. The 911 board may also consider workshops that educate local providers on the content needed in each plan.

We would like to thank the Board for its work and willingness to hear our concerns on this issue.

Adams, Ron

From: Reid, Wesley [Wesley.Reid@greensboro-nc.gov]
Sent: Thursday, May 05, 2011 5:01 PM
To: SVC_ITS.911comments
Subject: comments for the board - Thanks!

Could you please provide definitions for the three items below in the general definition section of the document. Is the Emergency Fire Plan a Fire Evacuation plan? What is a Damage Control Plan?

3.1.9.1 **Emergency Fire Plan.** There shall be a local management approved, written, dated, and annually tested emergency fire plan that is part of the CEMP.

22 3.1.9.2 **Damage Control Plan.** There shall be a local management approved, written, dated, and annually tested damage control plan that is part of the CEMP.

24 3.1.9.3 **Backup Plan.** There shall be a local management approved, written, dated, and annually tested backup Public Safety Answering Point plan that is part of the CEMP and approved by the NC 911 Board

Can you please replace or explain the word “penetrations” below with this standard. Do you mean unauthorized personnel or something else?

3.1.10 **Penetrations** into the Public Safety Answering Point shall be limited to those necessary for the operation of the center.

The Construction language is in Section 5.

5.1.1 The requirements in Section 4 Construction, shall apply only to new construction and construction renovations funded by the North Carolina 911 Board. Existing Public Safety Answering Point facilities are encouraged to meet these standards, but are not required to meet these standards.

Wesley

Wesley Reid, Director
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Adams, Ron

From: Julia Conley [juliac@wspd.org]
Sent: Thursday, May 05, 2011 6:19 PM
To: SVC_ITS.911comments
Cc: Doris Kinard; Ronnie Abernathy; Scott Cunningham; Tommy Leonard
Subject: Concerns - Draft Operational Standards 4/14/2011 version

Our Winston-Salem PSAP has concerns about some of the items within NC 911 Board Draft of Proposed Operating Standards and the ability to meet these standards by the compliance date of 7/1/2012. We appreciate all of the work that has gone into developing these proposed standards and we fully recognize the need for standards. We have the following comments and concerns:

Page 4:

17 **3.1.1** Any Primary Public Safety Answering Point, Backup Public Safety Answering Point, or
18 Secondary Public Safety Answering Point that receives funding from the NC 911 Board is required to
19 comply with all NC 911 Board Standards.

*****We request that the document be revised to allow 911 funds to be received by PSAPs when compliance is in progress, but the PSAP has not fully met the conditions. This has been implied verbally at the 911 Board meetings, but having it in writing as a process with remedial steps is requested. Please clarify that PSAPs will continue to receive 911 funds when out of compliance, if corrective actions are being taken.**

29 **3.1.4** Each Public Safety Answering Point shall maintain a Backup Public Safety Answering Point or
30 have an arrangement for backup provided by another Public Safety Answering Point. Agencies are
31 encouraged to pool resources and create regional backup centers.

32 **3.1.4.1** The Backup Public Safety Answering Point shall be capable, when staffed, of performing the
33 emergency functions performed at the primary Public Safety Answering Point.

*****Our PSAP has an arrangement for backup at another facility. However, it will not accommodate our full staffing needs. We are concerned about fully meeting this standard by 7/1/2012 and request that this compliance date be extended.**

Page 6:

23 **4.5.7 Isolated** Grounding System. Telecommunications equipment, two-way radio systems, computers,
24 and other electronic equipment determined to be essential to the operation of the Public Safety Answering
25 Point shall be connected to an **isolated** grounding system.

***** Recommend that **isolated** ground be changed to **dedicated** ground.**

Page 7

23 **5.1.1** The requirements in **Section 4 Construction**, shall apply only to new construction and

*****Typo - this is now Section 5 Construction**

Page 12

15 **6.3.5** Telecommunicators shall not be assigned any duties prohibiting them from immediately receiving
16 and processing emergency calls for service in accordance with the time frame specified in the Operating
17 Procedures.

*****A clarification may be needed here that this excludes tasks associated with communications center operations. The important point is are there enough telecommunicators on duty to handle the call workload. Our telecommunicators monitor burglar alarms for police facilities from within the Communications Center. Monitoring of equipment may be part of normal operations. Also, telecommunicators in our PSAP rotate positions and when assigned to dispatch channels may not be available to answer 911 call due to dispatch responsibilities in an emergency. However, we will always have telecommunicators specifically assigned as calltakers.**

Page 18

17 **9.4.1** The CAD system should have the capability to allow emergency call data exchange between the
18 CAD system and other CAD systems.

19 **9.4.2** The CAD system should have the capability to allow data exchange between the CAD system and
20 other systems.

***** What specific other systems? The above standards require development work from our CAD vendors, if different vendors and CAD systems. If PSAPs have the same CAD software, this will be more attainable. We can not conform to this standard at this time and even with the same software, different PSAPs can be configured very differently. We are concerned about fully meeting these two standards by 7/1/2012 and request that this compliance date be extended.**

Thanks for your consideration of these issues.

Julia

Julia B. Conley
IT Director
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Adams, Ron

From: Steen, Bryan [bsteen@co.burke.nc.us.mailstreet.com]
Sent: Thursday, May 05, 2011 10:12 PM
To: SVC_ITS.911comments
Cc: Hugh.Blackwell@ncleg.net; Mitch.Gillespie@ncleg.net; Bryan.Holloway@ncleg.net; Warren.Daniel@ncleg.net; Don.East@ncleg.net; Sen. Richard Stevens; citymanager@ci.morganton.nc.us; Darlene Bullins
Subject: Comments / Concerns related to DRAFT 911 Board Operating Standards- Version 04/14/2011

After notification from the NCACC on Tuesday afternoon, 05-03-2011, I've only had a short amount of time to review the Draft Operating Standards that are being considered for adoption / implementation. As you know, you are asking for review and comments during budget development season for all counties and cities and I don't believe two and a half days notice provides a reasonable opportunity for managers to make an adequate review of potential standards that could have a significant impact on future budgets.

Therefore, I request you allow an additional ninety days for review and comments so managers can complete development and adoption of the FY 2011-12 budget before adoption of the proposed standards. There are a lot of "shall[s]" in the draft standards and I am concerned about there budget impact as well as potential setup for law suits.

You may also want to review the draft for what may be mistakes:

Page 7, line 23, 5.1.1, "The requirements in Section 4 Construction, shall apply only to new construction and construction funded by the North Carolina 911 Board."

Section 5 of the draft pertains to "Construction" while Section 4 regards "Power."

In Section 6.4 Operating Procedures on Page 12, line 22, 6.4.1.1 states, "Compliance with 5.4.1 shall be evaluated monthly using data from the previous month."

I'm not sure of what is being addressed here, but Page 8, line 15, 5.4.1 states, "The Public Safety Answering Point and other buildings that house essential operating equipment shall be protected against damage from vandalism, terrorism and civil disturbances."

Again, I ask that the Board extend the comment period for an additional ninety days so managers can have sufficient time to make a reasonable review of the proposed standards and offer informed comments before the adoption of standards that may have a significant impact on budgets that are already under exceptional stress.

Thank you for the opportunity to make very superficial comments on an important matter.

Bryan Steen
Burke County Manager
Phone (828) 439-4340
Fax (828) 438-2782

Adams, Ron

From: Doug Workman [Doug.Workman@townofcary.org]
Sent: Friday, May 06, 2011 8:28 AM
To: SVC_ITS.911comments
Subject: Updated Concerns - Cary

3.1.3.2 The Telecommunicators shall be trained and capable of using the alternate means in the event of failure of the primary communications system. **How will this be measured?**

3.1.4.3.1 The plan shall include the ability to reroute incoming emergency call traffic to the backup center 4 and to process and dispatch emergency calls at that backup center. **Are they expecting an automatic reroute?**

6 3.1.5 The Public Safety Answering Point shall be capable of continuous operation long enough to
7 enable the transfer of operations to the Backup Public Safety Answering Point in the event of an
8 emergency in the Public Safety Answering Point or in the building that houses the Public Safety
9 Answering Point. **If a tornado hits your primary building or equipment it may take a short amount of time to get everything transferred and get personnel to the other locations. Also, let's say you have a complete failure in your backup equipment. You may not have that continuous operation.**

18 3.1.10 Damage Control Plan. There shall be a management approved, written, dated, and annually tested
19 damage control plan that is part of the CEMP. **I think Damage Control should be defined in the definitions section.**

20 3.1.11 Penetrations into the Public Safety Answering Point shall be limited to those necessary for the
21 operation of the center. **Is this really needed in the standards? This should be governed by the director of the center.**

Section 4 Power **Some of these items will need to be budgeted for and will not be available until 2012-2013 budget. When will this standard go into affect?**

4.5.3.2 An engine-driven generator installation or equivalent designed for continuous operation, where a person specifically trained in its operation is on duty at all times. **Does this mean when it is in operation or do you expect someone to be on duty at all times. What does on duty mean? Someone working at the center or agency or someone to call in case of issues?**

5.1.1 The requirements in Section 4 Construction, shall apply only to new construction and construction renovations funded by the North Carolina 911 Board. Existing Public Safety Answering Point facilities are encouraged to meet these standards, but are not required to meet these standards. **Should this not read "Section 5"?**

5.2.2 HVAC systems shall be independent systems that serve only the Public Safety Answering Point. **I am not sure why this has to be a standard? Why does a PSAP have to budget for it's own HVAC and not be a part of the Public Safety Building like most are already?**

5.2.5 Backup HVAC systems shall be provided for the operations room and other spaces housing
4 electronic equipment essential to the operation of the Public Safety Answering Point. **Why is this necessary? If you have a backup center, you could re-locate until your unit is back in service.**

5.3.2 The alarm system shall be monitored in the operations room. **I don't know of many locations that monitor these alarms. Ours is monitored by an alarm company.**

5.4.1 The Public Safety Answering Point and other buildings that house essential operating equipment shall be protected against damage from vandalism, terrorism, and civil disturbances. **How can we mandate this? There is no way we can protect from being vadalized.**

5.6.2 Emergency Lighting. The Public Safety Answering Point shall be equipped with emergency lighting that shall illuminate automatically immediately upon failure of normal lighting power. **If you are requiring someone to have a generator or backup power, why do you need this standard?**

6.1.3 Where maintenance is provided by an organization or person other than an employee of the PSAP complete written records of all installation, maintenance, test, and extension of the system shall be forwarded to the responsible employee of the PSAP. **Why? This could lead to a lot of records to be maintained by the PSAP.**

6.1.5 All equipment shall be accessible to the PSAP for the purpose of maintenance. **If a PSAP is using a hosted solution for any system and they have a maintenance contract with the provider, why does the PSAP need accessibility to the equipment?**

6.2.1 Telecommunicators and Supervisors shall be certified in the knowledge, skills, and abilities related to their job function. **If you are going to say certified, you should define what certified means.**

6.2.2 Telecommunicators and Supervisors shall have knowledge of the function of all communications equipment and systems in the Public Safety Answering Point. **How will this be measured?**

6.2.5 Telecommunicators and Supervisors shall receive training to maintain the skill level appropriate to their position. **Who determines how much training this is and how it is received?**

6.2.6 Telecommunicators and Supervisors shall be trained in TDD/TTY procedures, with training provided at a minimum of once per year as part of the Annual Training. **What type of training is mandated? Is a simple review of the procedure via in service type training good?**

6.3.3 Where communications systems, computer systems, staff, or facilities are used for both emergency and non-emergency functions, the non-emergency use shall not degrade or delay emergency use of those resources. **In my opinion this is too vague. How can you tell if an agency is complying with this?**

6.4.1.1 Compliance with 5.4.1 shall be evaluated monthly using data from the previous month. **Should this not read "Compliance with 6.4.1"**

6.4.2 The Public Safety Answering Point is required to provide pre-arrival medical protocols as set forth by the North Carolina Office of Emergency Services, Health and Human Services in the initial call reception or by the responsible EMS provider on behalf of the primary answering point. **I thought this was removed? The ability to perform EMD is governed by the Medical Director and not the PSAP itself. If the medical director pulls the PSAPs ability to perform EMD, then we would not meet this standard at no fault of ours.**

6.4.3 For law enforcement purposes, the PSAP shall determine time frames allowed for completion of dispatch. **If you're not going to set a specific time, then why have it as a standard?**

6.4.4.1 The PSAP shall transfer calls for services as follows: **Should the standards identify when a call should be transferred? Misroute, EMS, etc?**

6.4.6 An indication of the status of all emergency response units shall be available to appropriate Telecommunicators at all times. **How will this be accomplished with mutual aid calls between agencies that have separate systems?**

6.4.7 Records of the dispatch of emergency response units to call for services shall be maintained and shall identify the following: **How will we get all the required info from mutual aid units responding?**

6.4.10 Standard operating procedures shall include but not be limited to the following:

- All standardized procedures that the Telecommunicator is expected to perform without direct supervision. **This is very vague.**
- Time limit for acknowledgment by units that have been dispatched. **Will there be a time limit set for this and how is a PSAP going to mandate when officers acknowledge a dispatch?**

6.4.11 Every Public Safety Answering Point shall have a comprehensive regional emergency communications plan as part of the CEMP. **What does the standard want to see in a comprehensive regional emergency communications plan? That is too broad to and can be interpreted in many different ways.**

6.5.2 All timekeeping devices in the Public Safety Answering Point shall be maintained within ± 5 seconds of the main recordkeeping device clock. **This is going to require us to spend some funding to attach systems to one time source.**

7.3.1 At least two 911 call delivery paths with diverse routes arranged so that no single incident interrupts both routes shall be provided to each Public Safety Answering Point. **We have to have the Backup site to make this happen.**

9.4.1 The CAD system should have the capability to allow emergency call data exchange between the CAD system and other CAD systems. **What is the defined data? This is vendor specific. They may have problems getting agencies to comply.**

9.4.2 The CAD system should have the capability to allow data exchange between the CAD system and other systems. **Again, what kind of data?**

9.6.4 Under all conditions, the CAD system response time should not exceed 2 seconds... **How will this be measured? Venders are unable to provide this data.**

9.6.5 The CAD system shall be available and fully functional 99.95% of the time... **Again, this is vendor specific and our vender is unable to provide this type of report for our CAD. How will this be measured?**

10.1.1 Tests and inspections of all systems shall be made at the regular intervals. **How will this be reported?**

Doug Workman
Emergency Communications Center Supervisor
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May 5, 2011

To: Richard Taylor, Executive Director North Carolina 911 Board
From: Jim Soukup, Emergency Communications Director City/County of Durham
Re: Comments regarding State Operating Standards

Richard,

The Draft Operating Standards for North Carolina is a well-written document and hopefully one that will be implemented with few changes. Durham's comments for clarification are as follows:

1. Section 1.3 Application – Item 17: Would this apply to answering points in which 911 calls are transferred to? In Durham, we transfer 911 calls that are law enforcement related to the Durham S.O. Communication Center. Does this result in the Durham S.O being required to meet these standards although they receive no funding from the State 911 Board?

1.3 Application.

17 These standards shall apply to emergency 911 systems that include, but are not limited to, dispatching 18 systems, telephone systems, and public reporting systems that provide the following functions:

2. Section 6.4 Operation Procedures 6.4.1 – Item 19: The NENA standard is all calls should be answered within ten seconds or less during the busiest hour. We think this is sufficient and is the accepted national standard. The way this is worded all calls would have to be answered within 9 seconds or less. It is recommended at a minimum to add the phrase or less to both time requirements in this section and requested to adopt the NENA standard for ten seconds or less during the busiest time only rather than a 24-hour periods.

6.4.1 Ninety (90) percent of emergency calls received on emergency lines shall be answered within ten 20 (10) seconds, and ninety-five (95) percent of emergency calls received on emergency lines shall be 21 answered within twenty (20) seconds.

3. Section 6.4 Operating Procedures 6.4.1.1 – Item 22: What is the method to be used to evaluate compliance. If a PSAP has a major event(s) during the month such as the tornadoes that recently impacted the area which could result in non-compliance with 6.4.1 does a PSAP lose

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funding for the following month? What is the intention and period for compliance with 6.4.1 should a PSAP fail to comply for one month, quarter or longer period?

6.4.1.1 Compliance with 5.4.1 shall be evaluated monthly using data from the previous month.

Thank you for consideration with these issues. Please do not hesitate to contact me should you have questions or concerns.

Sincerely,

Jim Soukup
Emergency Communications Director City/County of Durham
Telephone: 919-560-4191