



4. The Board's activities are funded by a 9-1-1 surcharge of 70¢ per month on each CMRS connection (cell phone) in the state.
5. Surcharges remitted to the Board are deposited into the statutorily created CMRS fund and sub-funds, one of which is a grant fund.
6. The Board utilizes those funds in a grant program that typically operates on an annual cycle awarding grants to local government applicants for 9-1-1 projects.
7. The Board assisted in the initiation, support and expansion of LFUCG's Central Kentucky Network through the awarding of grant funds (Exhibit A).
8. Grant requests often are made to replace 9-1-1 equipment that is analog, past life expectancy and in some instances in danger of failing. Approval of grant requests in the 2013 and 2014 cycles of this type were conditioned upon joining an AT&T Network, Cincinnati Bell Network or the Central Kentucky Network.
9. Three or more grants were made to local governments/PSAPs which expressed the desire to join CKN, though AT&T was currently delivering 9-1-1 landline calls for some (or all) of their citizens in their jurisdiction.
10. AT&T referenced Laurel County in their petition; other included Whitley County/City of Corbin and Bluegrass 9-1-1 (Garrard and Lincoln Counties).
11. AT&T has refused or not cooperated with the expressed desire or specific request of the local governments (PSAPs) to have the 9-1-1 calls in their jurisdiction delivered to CKN for routing. The delay, confusion and uncertainty associated with the position taken by AT&T preclude a timely completion of the projects, creating a danger to public safety and 9-1-1 services, should equipment failure occur.

12. The CMRS Board expressed concern to AT&T on the circumstance in Laurel County (Exhibit B).
13. The modernization of 9-1-1 services, described as Next Generation 9-1-1, will replace the underlying technology for delivering 9-1-1 calls (currently analog and voice only) with an IP based statewide network which will use digital technology which can accommodate voice, video, text and data communications to PSAPs.
14. Such modernization will change this existing routing technology and delivery of 9-1-1 calls and by extension, may make such things as the traditional method for delivering calls and inter-connection agreements obsolete.
15. The Board will have a role to play in the aftermath of the PSC decision in this matter, regardless of the decision made.

Therefore the Board respectfully requests that the PSC resolve the matter so as to provide guidance to all parties involved, not only for the CMRS Board grant program, but more importantly, to resolve the matter with an understanding on its affect on implementation of Next Generation 9-1-1 in the state and whether there may be national implications to the decision, as well. To that end the Board would request that the PSC seek input and guidance from the Federal Communications Commission.

Respectfully Submitted,

By: \_\_\_\_\_

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**FILING NOTICE AND CERTIFICATE**

I certify that this Response is a true and accurate copy of the document(s) to be filed in paper medium with the Public Service Commission (which include a cover letter serving as the required Read 1<sup>st</sup> document) within two (2) business days; that the electronic submission of these documents to the Commission was performed on August 26<sup>th</sup>, 2015; and that there are currently no parties that have been excised from participation by electronic service.

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ATTORNEY FOR KENTUCKY CMRS  
BOARD



