

Jerry Keathley, President
National Emergency Number Association
Kentucky Chapter
4265 Dixie Hwy
Dry Ridge, KY 41035
Phone: 859-428-1212

RECEIVED

OCT 02 2009

PUBLIC SERVICE
COMMISSION

October 2, 2009

Executive Director
Public Service Commission
211 Sower Blvd.
Frankfort, KY 40602

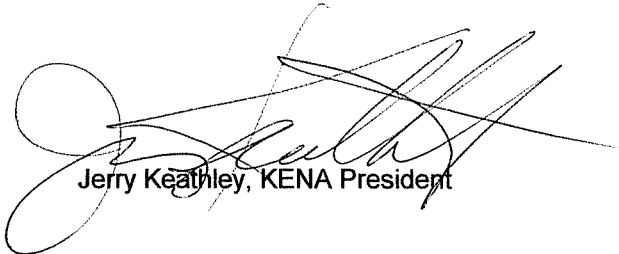
RE: Case NO. 2009-00100 TracFone Wireless

Dear Sir/Madam:

I am writing in regards to the above referenced Case involving TracFone Wireless and I respectfully request this case be denied. I am a Kentucky Certified 9-1-1 Telecommunicator with eighteen (18) years of experience in the field and I am the current President of the National Emergency Number Association Kentucky Chapter (KENA) representing 9-1-1 Professionals from across the Commonwealth. Many things about the TracFone request concern me and I feel these concerns need to be addressed by TracFone before they are allowed to move forward on any such request. TracFone requests to be designated as an Eligible Telecommunication Carrier (ETC) to receive low-income federal universal service support for services offered throughout the Commonwealth of Kentucky, yet they are not a registered business in the Commonwealth and provide no assistance to the Telecommunication Relay Service (TRS) fund or the Telecommunication Access Program (TAP) fund. TracFone Wireless does not support the Kentucky 9-1-1 Public Safety Answering Point (PSAP), yet predicts it will sell more than 150,000 phones for Kentucky Lifeline Customers, who are 9-1-1 customers. Although I support programs that allow low-income access to 9-1-1 across the Commonwealth, the companies who provide such services must support all of the Commonwealth's 9-1-1 programs, including funding of PSAP's in order to make these programs successful. Multiple wireless companies operate within the Commonwealth and support 9-1-1 funding to PSAP's and carry the costs, when companies such as TracFone, do not participate in 9-1-1 partnerships by providing funds.

Also of note is the common practice of wireless carriers providing services to low-income families to sell them a simple wireless phone to use for emergencies. These phones, when used to call 9-1-1, fail to provide 9-1-1 operators with information necessary to provide emergency services to the caller. Phase II Wireless provides 9-1-1 operators with Automatic Number Identification (ANI) and Automatic Location Information (ALI) providing GPS Coordinates of the handset which allow the operator to map the caller's location and send emergency services to an area when the call is silent or abandoned by hangup. When minutes on wireless phones expire they may still be used to access 9-1-1 centers and are referred to as non-initialized wireless phones. When call takers receive non-initialized calls, ANI/ALI information is missing or incomplete. If allowed to proceed, Tracfone will soon place 150,000 or more non-initialized phones into the field and place even more of a burden on our 9-1-1 centers as they answer these calls. Callers who use non-initialized phones do not know that their location and information will not be provided automatically, which gives them a false sense of security in an emergency. And when silent or hangup calls are received, these PSAP's are forced to tie up all their emergency services in an attempt to provide some response to these calls.

Thank you for your attention to this matter.


Jerry Keathley, KENA President