

# Mid-America Regional Council 9-1-1 POLICY GOVERNING INTERGRATION OF WIRELESS 9-1-1 SERVICE WITH EXISTING SERVICE IN THE MARC 9-1-1 SERVICE AREA

## I. INTRODUCTION

- A. **Purpose:** The purpose of this policy is to govern integration of wireless 9-1-1 service by wireless service providers with the existing MARC system in the MARC 9-1-1 service area.
- B. **Applicability:** The terms of this policy apply to all wireless service providers and local exchange carriers in the MARC 9-1-1 service area.
- C. **Definitions:**
  - 1. “9-1-1 Coordinating Committee” means the policy board created by the Interlocal Cooperation Agreement signed by the participants in the Kansas City regional 9-1-1 system, or any subcommittee of the policy board.
  - 2. “ALI/SR” means the Automatic Location Identification/Selective Routing systems chosen by MARC.
  - 3. “Confidential Information” means any information permitted to be maintained as a closed record under the Revised Statutes of the State of Missouri or the Kansas Statutes.
  - 4. “Local Exchange Carriers” (LEC) means a Telecommunications Carrier (TC) under the state/local Public Utilities Act that provides local exchange telecommunications services. Also known as Incumbent Local Exchange Carriers (ILECs), Alternative Local Exchange Carriers (ALECs), Competitive Local Exchange Carriers (CLECs), Competitive Access Providers (CAPs), Certified Local Exchange Carriers (CLECs), and Local Service Providers (LSPs).
  - 5. “MARC” means the Mid-America Regional Council.
  - 6. “MARC 9-1-1 service area” means the eight (8) county Kansas City metropolitan area composed of Cass, Clay, Jackson, Platte and Ray Counties in Missouri and Johnson, Leavenworth and Wyandotte Counties in Kansas.

7. “MARC 9-1-1 system” means the network, database, and customer premises equipment owned and operated by MARC and/or the MARC 9-1-1 system participants and used to provide 9-1-1 service in the MARC service area.
8. “MARC 9-1-1 systems participants” means the governmental entities within the MARC 9-1-1 service area contributing to the cost of the MARC 9-1-1 system.
9. “PSAP” means a public safety answering point, the location at which 9-1-1 calls are initially answered.
10. “Wireless service provider” means a provider of commercial mobile service pursuant to Section 332(d) of the Federal Telecommunications Act of 1996 (47 U.S.C. Section 151 et seq).

## II. CONFIDENTIALITY

### A. *Confidential Information*

There may be information that comes into the possession of MARC and/or MARC 9-1-1 system participants that is confidential. MARC and MARC 9-1-1 system participants will use their best efforts to keep confidential information as closed, confidential records to the extent permitted by law. All 9-1-1 Coordinating Committee members and MARC personnel will be instructed to not disclose any confidential information that comes into their possession or knowledge, and all 9-1-1 Coordinating member and MARC personnel will sign a copy of this policy regarding confidentiality, indicating their knowledge and adherence to this policy and all procedures and protocols contained herein. Any provisions of this policy notwithstanding, MARC and/or MARC 9-1-1 system participants will handle confidential information in accordance with applicable federal, state and local law.

### B. *Procedures*

1. Transmittal and Receipt of Confidential Information.
  - a. Authorized Personnel. The 9-1-1 Manager for MARC shall designate MARC personnel who are authorized to open and conduct initial screening of information marked confidential. Authorizations shall be periodically reviewed and updated as necessary.
  - b. Transmittal of Confidential Information. All confidential information transmitted to MARC whether by postal

mail, electronic mail, facsimile transmission or other transmission, must be explicitly and clearly identified as “confidential” and must be addressed to authorized MARC personnel. Information that is not clearly marked as confidential and/or not addressed to authorized MARC personnel may not be treated as confidential information

- c. Receipt of Confidential Information. All unauthorized MARC personnel will be instructed to verbally and in writing to forward, unopened, all transmissions marked confidential to authorized personnel. All MARC personnel will also be directed orally and in writing that should any correspondence marked confidential come into their possession, the confidential correspondence is to be unread, uncopied, replaced within its original packaging, and immediately forward to authorized MARC personnel.
2. Initial Screening: Authorized MARC personnel will conduct an initial screening to separate confidential information from non-confidential information. Only information meeting the definition of confidential information will remain a closed record. The authorized MARC personnel responsible for screening confidential correspondence will preserve all confidential information as a closed record and process it in accordance with this policy. All other correspondence will be processed in routine fashion and will not be kept as a confidential, closed record.
3. Viewing. Only authorized MARC personnel will be allowed to review, inspect, or otherwise view confidential information in the possession of MARC.
4. Storage. All confidential information will be prominently marked “Confidential/Closed Record” and “Access by Authorized Personnel Only.” All confidential information will be stored separately from other information. All confidential information will be securely kept either in the MARC offices or MARC’s storage room.
5. MARC 9-1-1 System Participants. Any confidential information received by members or employees of MARC 9-1-1 system participants will be handled in substantial compliance with this policy. MARC 9-1-1 system participants will report to MARC any unauthorized or unorthodox access to confidential information, including a detailed description of the incident; identification of the information disclosed; and/or those persons who accessed the

confidential information. This information shall be reported to MARC as soon as practicable after any member or employee of a MARC 9-1-1 system participant becomes aware that confidential information has been subject to unauthorized or unorthodox access.

### **III. DIVISION OF RESPONSIBILITIES AND COST ALLOCATION**

#### *A. Connection and Cost Allocation*

Within the MARC 9-1-1 service area all wireless service providers and local exchange carriers must connect to the MARC 9-1-1 ALI/SR. The Wireless Telecommunications Bureau of the Federal Communications Commission has ruled that the demarcation point for allocating costs between wireless service providers and PSAPs is the input to a 9-1-1 ALI/SR. Therefore, all wireless carriers are responsible for the costs of all hardware and software components and functionalities to the point of the MARC 9-1-1 ALI/SR. In accordance with the ruling by the Wireless Communications Bureau of the Federal Communications Commission, wireless service providers cannot require additional technical or operational stipulations or cost recovery agreements from MARC or the MARC 9-1-1 system participants. Wireless service providers have the option of incorporating any such costs into their basic cost structure.

*B. Information to be Provided by Wireless Service Providers.* Wireless service providers must provide the telephone number of the originator of a 9-1-1 call, the location of the cell site or base station receiving a 9-1-1 call from any mobile handset accessing their systems, and the X/Y coordinate of the location of the originator of the 9-1-1 call, within FCC accuracy requirements. Information provided must be in a format compliant with NENA standards and must be usable by the 9-1-1 Selective Router. The costs associated with development and maintenance of a system to deliver this information is the responsibility of the wireless service providers.

*C. Responsibilities of MARC and the MARC 9-1-1 System Participants.* The MARC 9-1-1 System will receive and utilize data elements associated with the wireless 9-1-1 service. Costs associated with existing MARC 9-1-1 system components and functionalities beyond the input to the MARC 9-1-1 ALI/SR, including the MARC 9-1-1 ALI/SR itself and the trunks between the MARC 9-1-1 ALI/SR and the PSAP customer premises equipment is the responsibility of MARC and the MARC 9-1-1 system participants.

#### IV. POINT OF CONTACT

- A. *PSAP Communications.* MARC is an agent of local governments throughout the region and responsible for coordination of 9-1-1 service. Administrative issues involving the delivery of 9-1-1 service in the region will be coordinated by MARC. Wireline and Wireless service providers should not be contact PSAPS directly regarding the offering of 9-1-1 services nor the administration of such services
- B. *Automatic Location Identification/Selective Routing System.* The wireless service providers, local exchange carriers and the 9-1-1 service provider will be integrated into existing Automatic Location Identification/Selective Routing (ALI/SR) systems. This may be accomplished through a variety of technology choices as determined by the 9-1-1 Coordinating Committee.
- C. *Directing Traffic to the ALI/SR.* The wireless service providers and local exchange carriers are responsible for directing 9-1-1 traffic to the MARC 9-1-1 selective router. The policy of the regional 9-1-1 system is that new services and features will not degrade the quality of the existing MARC 9-1-1 system as determined by the 9-1-1 Coordinating Committee. Wireless service providers and local exchange carriers connecting with the MARC 9-1-1 system must agree to adhere to all existing administrative and operational policies adopted by the 9-1-1 Coordinating Committee.