

Comments in Support of Michigan House Bill 4683

As Submitted to the Senate Committee on Energy and Technology

Background

- Michigan State University has been installing telephone systems that are E911 compliant since 2004, several years before the legislature amended the Emergency 9-1-1 Service Enabling Act of 1986 to require E911 for MLTS owners.
- New systems or upgrades in 68 buildings since 2004 are compliant. Many existing systems in 88 additional buildings do not support required E911 technology.
- We are committed to accessible E911 and emergency communications for our students, faculty and staff. However, modern communication systems are complex, capital intensive and take time to properly design, procure and deploy.

Comments on Existing Legislation

- PA32, Chapter IV, Section 484.1405 directed the Michigan Public Service Commission to draft rules starting in 2007. Rules were not officially promulgated until October 20th, 2011, less than 3 months from the December 31st, 2011 compliance deadline.
- Certain technologies require more capital expense to ensure compliance and development of reliable tracking methods and tools is in a nascent stage, especially given the intense shift to mobile devices and applications.
- We believe that the legislature intended the 2007 legislation to provide adequate notice to system owners such that they could allocate funds and convert systems.
- The state 911 advisory committee recommended a 7 year implementation of E911 for MLTS owners in its 2006 report to the legislature.
- Very few MLTS owners are aware of these impending rules and the potential legal liability for non-compliance.
- Many MLTS owners, including MSU, simply cannot meet a December 31st, 2011 deadline given time intervals and resources required.

Proposed Solution

- We do not believe that E911 compliance efforts should be abandoned. We support the effort and its many merits and will continue to participate in the process.
- **Michigan State University supports Michigan House Bill 4683 as passed unanimously by the House of Representatives, and as introduced in the Senate.**



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