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To: Representative Henry Yanez
From: Jim Valentine & Lisa Hall
Re: SB 636

The Michigan Communication Directors Association (MCDA/911) is opposed to Senate Bill 636 and we are asking you to consider our concerns which are State level oversight, citizen choice, access and service reliability for emergencies and affordability.

The MCDA believes the decision and authorization to allow telephone companies to discontinue landline service should be decided at the state level (i.e. the MPSC) and not at the federal level (i.e. FCC) to maintain local knowledge, control and accountability. It is important that the MPSC be allowed to take action and file complaints. The current bill allows only citizens to initiate complaint or investigation.

This bill removes the citizen's ability to chose what is the safest, most reliable option for telephone service in their home for emergency use. Many factors come into play when looking at if there is a replacement that is 'comparable' and 'reliable'.

A landline provides a layer of security and safety over wireless and VOIP systems. There are some areas and citizens that are reliant on landline service and the security and access it provides.

Rural areas pose wireless coverage concerns. Will the FCC and the providers look at an area closely enough before deeming wireless an option for replacement? Will they ensure that the coverage is excellent in each area, works inside each home, there are no dead spots and there aren't any broken conversations before they call it comparable and reliable to a landline? Just because an area shows on a map to have wireless coverage does not mean it's good coverage or even fair coverage. There are many citizens keeping their landlines based on the type of wireless coverage in their area. Particularly the rural population, the elderly and residents with known medical conditions. Because a landline provides the exact location of the caller, caller information and number on a 911 call, these are more reliable for homes with small children, residents with medical problems, speech impairments and language barriers. With a landline, if a resident calls 911 and can't speak or doesn't know or can't remember the address, the 911 dispatchers already have the location at their fingertips. With a wireless call, the 911 dispatcher would only have the latitude and longitude of the area the caller is calling from. If the caller is inside a house or building, it would take a door to door response to locate the caller. This could be time that cannot be spared in a life threatening situation. This is also dependant on the technology the phone the caller is using is capable of.

Many choose to maintain their landline based on the fact that there are small children in the home. The landline is always 'on', always 'charged', always 'unlocked', easy to use and if they can't speak or can't remember their address - the landline provides this information to the 911 dispatcher. Some choose to keep the landline so that there is reliable access for babysitters or in home health care. Again, always charged, on and able to provide location information. Those residents with medical concerns are keeping landlines for reliability, use of alarms, medical alerts and sometimes equipment. Some choose to maintain the landline technology because it is easy to use, easy to see and easy to understand. (senior population)

Severe weather and disasters have a great impact on telephone service. Power outages especially ones that are long term pose problems for having charged cellular phones. They pose problems for internet connections and power to computers that feed VOIP systems.

VOIP phone systems are capable of providing location information to 911 Centers on 911 calls if they offer that service. These systems are reliant on the customer for inputting the location information and keeping it up to date. These systems can be technically challenging. Some of these systems charge extra for the ability to dial 911 and to have it display location information. Some of these systems don't dial the local 911 agency directly. For these systems, the 911 call goes to a call Center usually in another State and they attempt to determine what area the call is in and then transfer the call to the local 911 center on a non emergency seven digit number.

We appreciate that technology is making changes and impacts on the telephone industry. However, the safety and reliability of our new options does not match what the landline provides yet. And we have citizens in this state that are relying on these landlines as their lifelines.

The Executive Board of the MCDA welcomes and encourages members of the House of Representatives to contact them or their local 911 Manager for additional information and to answer any questions concerning SB 636.