

2021 WIRELINER 911 COST RECOVERY REPORT



IOWA DEPARTMENT OF
HOMELAND SECURITY AND
EMERGENCY MANAGEMENT

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Executive Summary

The Iowa Department of Homeland Security and Emergency Management (HSEMD) is pleased to present its findings on Wireline 911 Cost Recovery fees. This report and its findings were undertaken in large part because of several factors concerning wireline fees, the primary factor being a lack of insight on the amounts wireline telephone providers were charging public safety answering points (PSAPs) for the delivery of 911 calls. Other notable factors include outdated infrastructure, record keeping, and the simple passing of time exacerbated the issue, which meant in many cases the providers and the PSAPs had a hard time determining which circuits were still in use and the basis for costs being incurred.

Through a process described in the report, HSEMD received data from half of the counties in the state. In many cases the data received was challenging to organize into a useful comparison with a definitive associated cost. Additionally, many invoices seemed unnecessarily confusing. Another hurdle was the overall lack of data. Extrapolating costs for 50% of the state is not ideal when trying to determine a total statewide cost, especially when there is of a wide array of charges and costs associated with wireline 911 call delivery.

The report discusses the potential for a significant amount of additional costs that were not captured due to developments with one large, statewide telephone company that occurred after the data collection phase was completed. The telephone company had stopped its billing statewide, but began seeking reimbursement for costs again during the drafting of the document. HSEMD accounted for the missing information by providing an estimated range of total costs.

While heavily caveating the findings, HSEMD was able to estimate that total wireline cost recovery fees total between \$2.25 and \$2.70 million dollars per year. We further describe throughout this report that HSEMD had intended to absorb these costs through the wireline migration project. Given the estimated fees, it may be likely that HSEMD will be unable to take on such costs. HSEMD's ability to incur these costs year-to-year may be impossible given our existing costs during each period and the possible increases of fluctuations in the costs themselves. Options to address this are also presented within the report.

HSEMD understands this topic is technical. In order to better describe the costs referred to as "cost recovery," please see Appendix C on page 18.

HSEMD would like to thank the many PSAPs and telephone companies that participated in submitting data, as well as the Iowa Utilities Board, Iowa Communications Alliance, Iowa Communications Network (ICN), and the Iowa Attorney General's Office for helping during the early stages of this effort.

Introduction

In 2018, the Iowa Department of Homeland Security and Emergency Management was directed in [House File 2254](#) to consolidate or merge the legacy land line 911 network onto the wireless Next Generation 911 network. The consolidation was to be done as a cost-saving measure, to eliminate old technology and to alleviate costs at the local level. HSEMD contracted with the ICN on a project to aggregate local landline traffic and asked for “all-inclusive pricing.”

Through this project, it was determined the pricing provided by ICN only covered transport infrastructure and did not cover additional costs that some telephone providers had historically charged PSAPs. Legislation indicates that HSEMD is to take over or absorb the wireline costs historically paid for by the PSAPs.

Through the contract with ICN, HSEMD was able to eliminate the costs of the legacy transport network formerly provided by Lumen (previously known as CenturyLink). Once notified of a successful migration, PSAPs can disconnect those legacy circuits and alleviate those costs. However, this leaves the costs that telephone providers have been historically charging the PSAPs. In order to determine the total costs for these charges, HSEMD engaged in discussions with stakeholders and requested information to complete an analysis which is detailed in the report.

Through this analysis, HSEMD determined that there was no set standard cost being paid to the telephone companies by the PSAPs. Some telephone companies charged flat fees. Others cited National Exchange Carrier Association (NECA)

Tariffs. Some charge for mileage. Others charged for Automatic Location Information (ALI) database changes. Further hampering the full estimate of statewide wireline cost recovery costs was the FCC’s Customer Proprietary Network Information (CPNI) rules. Telephone companies were not able to directly share their costs/billing practices as HSEMD was not the customer of record. The cost-recovery bills had to be shared by the PSAPs to HSEMD for aggregation and analysis.

Many PSAPs and telephone companies did not keep accurate legacy circuit records or have knowledge of what infrastructure was actively transporting 911 calls, so this discovery was an additional hurdle. To accurately determine wireline cost recovery, HSEMD wanted to ensure the infrastructure that was being billed for was still needed.

After numerous meetings which included HSEMD, the Iowa Communications Alliance, the Iowa Utilities Board, ICN, and the Iowa Attorney General’s office, a joint letter was drafted and signed by HSEMD and the Iowa Communications Alliance and sent to the states’ 150 telephone companies (Appendix B). The letter provided background information, instructions for telephone companies and PSAPs, and a timeline to determine the statewide wireline cost recovery estimate. The letter also asked telephone providers to standardize their billing practices into similar cost categories. The document provides the analysis and information gathered from this effort.

Presentation of Findings

Background

The FCC requires that all telephone providers deliver 911 calls with dispatchable location ([47 CFR Part 9](#)), however, that regulation is currently silent on the funding relationship. In 2001, the FCC ruled that wireless carriers must ingress into the State's 911 networks at locations determined by the State. This initially included the requirement for wireless cost recovery. However, in a [second order](#) (King County Ruling) shortly afterward, the FCC removed the requirement and made wireless cost recovery optional, or as determined by the states. In its ruling, the FCC sought to clarify the demarcation point for 911 cost allocations by, "helping to eliminate a major source of disagreement between the parties."

Iowa law allows for wireless cost recovery until 2026. Currently, two wireless carriers seek wireless cost recovery. However, the State has received notice that one carrier will cease invoicing beginning in the calendar year 2022. By reimbursing costs to deliver 911 calls, counties along with HSEMD are essentially paying telephone companies for something they are required by federal law to provide.

Wireless 911 cost recovery totaled \$848,770 during 2021. It is estimated that Wireless 911 calls represent 87% of total 911 calls in Iowa. The process and eligibility for wireless cost recovery is explicitly spelled out in Iowa Code 34A.7A and is set to sunset in 2026. Approximately two thirds of states in the nation reimburse wireless cost recovery.

Wireline calls represent approximately 12% of all 911 calls in the State. Wireline 911 Cost recovery is not explicitly addressed in Iowa Code 34A.

Analysis

Through the process outlined in the report and in Appendix B, it was determined that Wireline 911 Cost re-

covery totals between 2.25-2.70 million a year. Analysis was done on the bills and billing analysis provided by PSAPs to HSEMD. This comes out to an annual average of \$22,800-\$27,300 per county.

Fifty-three counties responded to the request for information by providing bills or monthly costs analysis, including data from 107 telephone companies. Forty-six counties did not submit data, and HSEMD estimated costs for the missing data. Some of the largest counties, including Dallas, Linn and Polk, did not submit cost information.

It was also determined that several telephone companies do not charge for 911 cost recovery.

South Central Iowa Regional 911 Board (made up of Adair, Adams, Clarke, Guthrie, Madison, Taylor, and Union counties) presented the highest costs at \$23,153.45 a month (or \$3,307.63 per county).

Costs for ALI Database maintenance ranged from no costs to \$1,113.60 a month. Fifty-six out of the 107 telephone companies were documented to charge for ALI Database maintenance. ALI costs extrapolated statewide are estimated to be \$178,843.92 using the same methodology described in the report.

Any suggestion to simply remove ALI database costs as an eligible expense would have little impact. Simply removing those costs would still leave over \$2-\$2.5 million in wireline costs.

While many PSAPs and telephone companies cooperated in this process, only one telephone company in the State modified/standardized their billing practices as requested in the letter. Due to the lack of standardized billing practices, there is no way to ensure an equal comparison in our analysis. Regarding the

Presentation of Findings

standardized cost request, one additional telephone company did note they would comply with the request once HSEMD became the customer of record.

The costs most frequently documented and the ranges are listed below:

- Documented 911 Circuit costs ranged from \$.70 a month to \$4,706 a month.
- Channel Mileage amounts ranged from \$.07 a month to \$2,918.72 a month.
- Channel Mileage Termination ranged from \$11.23 a month to \$692.11 a month.
- Channel Termination costs ranged from \$34.10 a month to \$1,166.90 a month.
- Many other/miscellaneous costs were documented as well, ranging from \$1.00-\$2.00 a month to \$1,433.86 a month for various assessed fees.

Also of note and as shown in Appendix A, some telephone companies did change their rates. In some cases, this was done due to infrastructure identified as no longer being needed, and in some cases, this was an arbitrary reduction in price or a decision to waive the ALI record change fee. Conversely, one telephone company noted that they currently do not charge their local PSAP for cost recovery, but once HSEMD became the customer of record, the company would begin charging the State. It should be noted that there's nothing to prevent telephone companies from reinstating their old fee structure after lowering the costs in response to the study. In some cases, the rate change was agreed to after invoices were provided to HSEMD. Without documentation of the new rate, HSEMD kept the original rate as part of the calculation.

A number of PSAPs documented wide swings in costs from month to month, which was an additional complication in total cost calculation. In other words, the bills from the same telephone company were presented multiple months in a row, sometimes increasing 800% for one month, and then dropping back to "normal" levels. In these instances, HSEMD tried to average the amounts to come up with the overall total.

It is possible that some costs calculated through this process could be eliminated as they are no longer needed. HSEMD can advise PSAPs and telephone companies in this effort, but currently it can only be completed through collaboration between the telephone companies and the PSAPs. Disconnects must be ordered by the customer of record, in this case, the PSAP. In some instances, PSAPs are hesitant to do so, even with a reasonable assurance that no emergency calls are passing through the legacy connections.

Iowa Code 34A treats surcharge remittance attributable to a specific company as a confidential record. HSEMD is unable to provide specific details, however in some documented cases, the surcharge remitted by the telephone companies to PSAPs (which is based on the number of customers) was less than the cost to provide service. In one specific instance presented, the telephone company remitted surcharge in the amount of \$286 a month to the PSAP, while the cost paid by the same PSAP to the same telephone company for cost recovery was \$839 a month. It costs the PSAP \$839 for the telephone company's wireline 911 service which serves approximately 286 customers at a net loss of \$553 a month for the PSAP.

Additional Discussion & Variables

During this process, one wireline telephone company raised its tariff by 350%, raising some bills from \$290 to over \$1,300. The same telephone company began outreach to sell a two-year price lock to PSAPs, and then threatened price increases if the contract was not agreed to. This further demonstrates there is no standardization of costs, and telephone companies can hold PSAPs hostage with their pricing under the current arrangement. Telephone companies have to provide 911 service, but because there is no regulation, they are free to name their price with no caps, no appeal process, and no demonstration of actual costs. However, there's also currently nothing preventing a PSAP from refusing to pay for wireline cost recovery, as there is no explicit basis for wireline cost recovery within Iowa Code 34A.

Telephone companies cannot simply disconnect service because of refusal to pay. In multiple documented cases, the telephone company stopped billing all together after a PSAP refused to pay for a length of time. In another case, the telephone company admitted to not knowing how the monthly total costs they were charging came to be or what they were based on. This is a very tenuous circumstance and relationship that should be clarified. PSAPs and 911 authorities should not subsidize wireline providers when wireline 911 calls make up 12% of total 911 calls but cost 250% more than wireless 911 calls.

The issue continues to evolve weekly, if not daily, as mentioned in the Executive Summary. One telephone company serving customers throughout Iowa initially cancelled all costs associated with wireline 911 call delivery. However, after the data collection phase during the finalizing of this written report, it was found that the company had started billing PSAPs for 911 service again. HSEMD tried to account

for this in the report by providing an estimated range to incorporate the statewide charges.

Many of the invoices submitted contained information regarding what would happen if payment was not received. Most instances included discontinuance of service for lack of payment. This would violate federal regulations, and HSEMD strongly recommends telephone companies remove this language.

At an estimated cost of \$2.23-\$2.68 million, HSEMD would be unable to guarantee fully absorbing the wireline cost recovery in totality as directed by Iowa Acts 2018, House File 2254. Recent year's surplus has fluctuated between \$1.9 and \$3.5 million. The amount is currently divided up equally between PSAPs and remitted to them as an end-of-year pass-through, per Iowa Code 34A.7A. In effect, that is the amount of excess surplus not spent by the State on an annual basis. Several options to address the wireline cost recovery charges are mentioned in the following section of this report.

Along with the possible absorption of the wireline costs, there will be an additional administrative burden placed on HSEMD to process, monitor, and pay invoices from 150 telephone companies in the state. It would become a significant process should HSEMD take on these costs as currently presented.

Discussion of Options

Presented in no particular order or priority recommendation

A. Legislative change to prohibit cost recovery

[Senate File 538](#) and [House File 407](#) were introduced during the 2021 legislative session to do this. The bills would clarify language within 34A to expressly forbid wireline cost recovery to the PSAPs and would strike the provision for wireless cost recovery before the 2026 sunset in 34A.7A. This would effectively save the State and local 911 authorities a combined \$3 million per year. It should be noted, nothing in the bills would prevent service providers from making up for the loss of cost recovery through billing their customers as part of the standard customer rates. The bills did require HSEMD to provide a [fiscal note](#) to the Legislative Services Agency. HSEMD used preliminary data received (on a much smaller scale) similar to this effort to determine cost impacts. In comparing the two datasets, the limited preliminary analysis was heavily skewed by one particular county. It should be noted that the same could happen with this subsequent study since only 50% of the counties responded.

B. Legislative change to keep PSAPs responsible for wireline cost recovery

HF2254 from 2018 could be amended to clarify that HSEMD will only be responsible for the costs associated with the transport of wireline 911 calls, rather than wireline cost recovery from the telephone providers. Effectively, this is where the payment structure currently stands. HSEMD has taken over

the transport of wireline 911 calls and is paying ICN for that transport. Local 911 Service Boards no longer have to pay Lumen for 911 selective routing and transport.

C. Establish a standard flat cost or not to exceed rate

HSEMD or the Iowa Utilities Board could be given the authority to negotiate rates with telephone providers in order to lower costs and ultimately afford to pay for wireline cost recovery. This would lock service providers into standardized rates and allow HSEMD to project costs and potentially fund wireline cost recovery at a more reasonable level. If HSEMD absorbs the wireline cost recovery, some sort of negotiated fee could still provide some level of standardized rate to be able to forecast costs.

D. Raise surcharge

The surcharge has been set at \$1.00 since 2014. An increase to that rate on wireless surcharge which is remitted to HSEMD would allow the Department to fund wireline cost recovery. It should be noted that this in and of itself does not wholly solve the issue. As pointed out, there's nothing to prevent continued increases in wireline cost recovery, which comes with no course for appeal or negotiation. A rise in the surcharge could precipitate a rise in wireline cost recovery.

Discussion of Options

E. Wireline surcharge remitted to State

This would require a change to Iowa Code 34A. Wireline Surcharge generates approximately \$10 million. It is currently remitted directly to local 911 service boards. A change to 34A to direct wireline providers to remit surcharge to the state would most likely be passed through to local service boards at the same rate as a wireless surcharge, which is 60%. That would leave an additional \$4 million to further fund the 911 at the state level and could help fund wireline cost recovery.

F. A recommendation for all PSAPs to discontinue payment of wireline cost recovery

As noted, there is currently no legal basis within Iowa Code 34A for wireline cost recovery. It's a creature of the way it has always been done. There could be a recommendation from the 911 Program for PSAPs to stop paying these fees. Due to 47 CFR Part 9, telephone providers would have to continue providing 911 service. This option would most likely end up being litigated, but could be clarified with additional FCC action on wireline cost recovery similar to the King County Ruling for wireless.

G. Changing local telephone 911 call delivery from CAMA to SIP

HSEMD could explore an option where IP-based calls inherently cost less. This option would determine if modernization by the telephone companies can potentially relieve or alleviate cost recovery. This would most likely come at a cost to implement SIP 911 call delivery, and it is uncertain who would be responsi-

ble for that non-recurring cost. HSEMD would most likely be prepared to pay for the one-time costs associated with the upgrades if there were no further monthly costs or limited and standardized costs associated with SIP delivery.

H. Discontinue Shared Services Program

The Shared Services contract is set to expire in the summer of 2022. Allowing the contract to expire and not renew the program would free up the needed funds to afford the wireline cost recovery expenses. This is not recommended due to the popularity and participation rates of the program.

Conclusion

The Iowa Department of Homeland Security and Emergency Management wishes to extend gratitude to those entities assisting in this effort. We see the results of this study as the basis of the next step decision makers and 911 stakeholders will need to consider to address this issue. HSEMD will continue to monitor this ongoing discussion as it impacts other states and bring forth trends and ideas from the national level. We look forward to addressing those changes and working through concerns with stakeholders until a resolution is determined.

Appendix A: Table of Data

Appendix B: Letter to PSAPs and Telephone companies

Appendix C: Glossary

For more information about Iowa's 911 program, visit:
www.homelandsecurity.iowa.gov.

Inquiries may be directed to the 911 program administrator at 515.725.3231 or 911@iowa.gov.

Appendix A: Table of Data

County	Note	DATE	ALI Charges Amount	ALI Charges rate Info	CIRCUIT'S	#11 Circuit Cost Amount	Channel Mileage (facility)Amount	Channel Mileage Rate Info	Channel Mileage Termination Amount	Channel Mileage Termination Rate Info	Channel Termination Amount	Channel Termination Rate Info	Other 1	Info on Other	Other 2	Info on Other	Other 3	Other 4	Circuits TOTAL with ALI	Circuit Trunk Rate Info	Surcharge Remittance
SCI (Adair, Adams, Clarke, Guthrie, Madison, Taylor, Union)	Bill was broken up by monthly access and surcharges. *****They seem to receive two bills a month, but they are not adequately marked so to what circuits each cover.	6/2021				\$1,779.30							\$94.29	Surcharges and other fees					\$2,373.59		
SCI (Adair, Adams, Clarke, Guthrie, Madison, Taylor, Union)	Bill was broken up by monthly access and surcharges	6/2021				\$4,293.00							\$1,433.86	Surcharges and other fees					\$5,726.86		
SCI (Adair, Adams, Clarke, Guthrie, Madison, Taylor, Union)	Bill did not have any discernible itemized charges	5/2021				\$1,846.63													\$1,846.63		
SCI (Adair, Adams, Clarke, Guthrie, Madison, Taylor, Union)	Bill did not have any discernible itemized charges	5/2021				\$3,898.07													\$3,898.07		
SCI (Adair, Adams, Clarke, Guthrie, Madison, Taylor, Union)	Bill had several charges that do not conform with the items we are looking for. Access and circuit charges \$5,147.12. surcharges and other fees \$368.29	11/2020	\$440.33			\$4,706.79							\$368.29	Surcharges and other fees					\$5,515.37		
SCI (Adair, Adams, Clarke, Guthrie, Madison, Taylor, Union)		8/2021					\$33.60		\$84.28		\$117.68								\$235.56		
SCI (Adair, Adams, Clarke, Guthrie, Madison, Taylor, Union)		7/2021	\$12.50				\$174.88		\$181.56										\$368.64		
SCI (Adair, Adams, Clarke, Guthrie, Madison, Taylor, Union)		7/2021	\$16.50				\$30.32		\$53.56										\$100.38		
SCI (Adair, Adams, Clarke, Guthrie, Madison, Taylor, Union)	Bill included line items that were not easily identifiable into a category. included lump amount	7/2021				\$445.05													\$445.05		
SCI (Adair, Adams, Clarke, Guthrie, Madison, Taylor, Union)	Listed as interstate charges.	7/2021											\$1,241.28	Interstate					\$1,241.28		
SCI (Adair, Adams, Clarke, Guthrie, Madison, Taylor, Union)	Not an itemized bill	7/2021				\$232.83													\$232.83		
SCI (Adair, Adams, Clarke, Guthrie, Madison, Taylor, Union)		7/2021					\$206.84		\$202.08		\$451.56								\$860.48		
SCI (Adair, Adams, Clarke, Guthrie, Madison, Taylor, Union)		7/2021	\$60.00			\$61.21	\$38.56		\$24.17		\$54.03		\$38.25	telone	\$22.49	business city access	\$10.00	loc sub line charge	\$308.71		
Atlamakee County	No All or Adm'n costs	3/2021					\$128.64		\$49.87		\$111.02								\$289.33		
Atlamakee County	No All or Adm'n costs	3/2021					\$128.64		\$49.87		\$111.02								\$289.33		
Atlamakee County	No All or Adm'n costs	3/2021					\$123.10		\$99.34		\$222.04								\$444.48		
Atlamakee County	No All or Adm'n costs	3/2021					\$35.07		\$49.87		\$111.02								\$196.26		
Atlamakee County	No All or Adm'n costs	3/2021					\$35.07		\$49.87		\$111.02								\$196.26		
Atlamakee County	No All or Adm'n costs	3/2021					\$12.89		\$49.87		\$111.02								\$173.58		
Atlamakee County	No All or Adm'n costs	3/2021					\$12.89		\$49.87		\$111.02								\$173.58		
Appanoose County	Received 3 separate bills all seemingly for the same services. Have combined them into one line.	4/2021	\$697.51			\$86.25	\$612.65						\$98.10	Private Line Mileage	\$24.90	Access charge per FCC order	\$1.02	Regulatory Assessment Surcharge	\$44.99	Bus Foreign Exchg Line	\$1,565.42
Appanoose County	Billing done by quarter. Total for 3 months \$38.50. Have included the costs for the highest month in this sheet for comparison purposes.	4/1/2021				\$23.00	\$139.00						\$19.00	Switch modification					\$181.00		
Black Hawk County	The bill went down from \$1175.23 to \$678.98	5/2021					\$678.98												\$678.98		
Black Hawk County		4/2021				\$40.00			\$33.70		\$47.00								\$120.70		
Black Hawk County	Changes due to NECA Tariff changes	7/2021					\$101.23		\$70.40		\$157.31								\$329.94		
Black Hawk County		7/2021	\$5.00			\$18.50													\$23.50		
Black Hawk County		7/2021	\$38.39			\$115.68													\$154.07		
Bremner County	Email estimate based off of tariffs							\$11.02		\$115.64		\$221.48							\$348.64		
Bremner County	Both bills included	06/2021	\$28.00	\$6 Per ALI Loccont. charge															\$28.00		
Bremner County		07/2021	\$207.46																\$207.46		
Carroll County	Windstream wants a renewed contract or - rate increase for the Out Of Term rate increase will be 10% - 20% of your monthly base rate. Sent term discounts by length of contract. 48 months would get a \$12,994.08 credit. 36 months would get a \$9,745.56 credit. 24 months would get a \$6,497.04 credit. No bill attached.																		\$0.00		
Carroll County	Using the NECA Tariff charges for a 2-wire voice grade dedicated circuit as a benchmark to compare against these rates, we feel the monthly charge for these circuits is within reason. For example, using 7/1/2020 NECA Tariff rates under rate band 27, the following rate elements would be billed for one 2-wire dedicated voice circuit:		\$64.00	per month		\$070.00	\$29.92		\$79.38		\$89.14								\$2152.44		
Cerro Gordo County	Charges do not match the categories we are tracking	6/2021				\$281.44													\$281.44		
Cerro Gordo County	Charges do not match the categories we are tracking	7/2021				\$468.70													\$468.70		
Cerro Gordo County	Charges are line items, but not billed in a discernible way	7/2021				\$1,230.62													\$1,230.62		
Cerro Gordo County		6/2021				\$519.80													\$519.80		
Cerro Gordo County		6/2021	\$60.00				\$110.28		\$125.12		\$279.68								\$575.08		
Cerro Gordo County		6/2021	\$60.00			\$67.90	\$70.96		\$59.12		\$132.14		\$7.08	Government taxes and fees	\$34.70	Monthly Charges			\$431.90		
Cerro Gordo County		6/2021	\$25.00			\$50.00	\$84.94		\$33.04		\$46.14								\$239.12		
Crawford County	Monthly Estimate by email		\$64.00			\$070.00	\$20.40		\$410.44		\$573.20		\$116.12	Signaling capability only billed when asked for.					\$1,854.25		
Davis County		7/2021	\$34.34			\$625.04			\$608.08		\$658.34								\$1,929.80		
Delaware County	Do not see any future costs related to the previous 6 Trunk Lines that have been discontinued.																		\$0.00		
Dickinson County		7/2021				\$208.52													\$208.52		

County	Notes	DATE	ALI Charges Amount	ALI Charges rate Info	CIRCUITS	911 Circuit Cost Amount	Channel Mileage (facility)Amount	Channel Mileage Rate Info	Channel Mileage Termination Amount	Channel Mileage Termination Rate Info	Channel Termination Amount	Channel Termination Rate Info	Other 1	Info on Other	Other 2	Info on Other	Other 3	Other 4	Circuits TOTAL with ALL	Circuit Trunk Rate Info	Surcharge Remittance
Dickinson County		7/2021				\$119.78							\$40.59	Federal and local fees						\$160.37	
Dubuque County	The total charge for 911 service has been in effect for a couple of decades. Per email from company, they do not know how this number came to be. No admin or ALI costs.	4/2021				\$70.00														\$70.00	
Dubuque County		7/2021				\$70.00														\$70.00	
Dubuque County	Credit on bill see Other charge	7/2021	\$85.00			\$201.28		\$151.18		\$337.84			\$77.50	10% of Cascade to Dubuque circuits						\$698.40	
Dubuque County	Credit on bill see Other charge	7/2021				\$2,918.72		\$522.18		\$1,166.90			-\$1,382.34	30% w/911 discount						\$3,225.46	
Dubuque County		6/2021	\$506.88			\$112.88		\$240.00												\$859.76	
Emmet County		7/2021				\$177.40		\$322.04		\$11.23		\$375.88		\$1.00 Non Publish						\$887.55	
Emmet County	No itemized portion of bill	7/2021				\$153.42														\$153.42	
Emmet County	Bill for long distances charges. Per bill, they charge a minimum \$23 fee if the total charges fall below \$100					\$330.20							\$25.00	Minimum monthly charge	\$23.16	Surcharges				\$48.16	
Emmet County	Bill was not itemized	6/2021				\$330.20														\$330.20	
Fayette County		4/2021		Not Charged		\$125.00		\$330.00												\$125.00	Looks at payments by quarter. Jan 2021: 113.00, Feb 2021: 113.94, March 2021: 114.00, less 1% (3.41) = remit \$327.53
Fayette County	No Circuit or ALI Costs	3/2021		Not Charged																\$0.00	Total billed \$1445.00, less 1% \$14.45, amount remit \$1,430.55
Fayette County	East Buchanan Telephone Coop does not charge us any tariff or line costs. We don't get a bill from them, just surcharge revenue.	3/2021	\$309.87			\$99.08		\$184.28		\$43.94										\$637.75	
Fayette County		4/2021																		\$0.00	154.92 remittance
Fayette County	Note: This rate has increased as of 1/1/2019 after a review of rates. Channel Mileage Facility Charge went from \$403.20 to \$698.78. Channel mileage termination remained the same. Bill reflects a 20% discount allowing for long term use of the circuit.	3/2021						\$698.78		\$160.96										\$859.74	Two lines - I.E.C and CLEC I.E.C surcharge \$46,000, less 1% \$2.68, remitted \$288.31. CLEC surcharge \$46,111, LESS 1% \$1.11, remitted \$109.89. TOTAL REMITTED \$376.20
Fayette County		4/2021		NA				\$541.76		\$92.16		\$205.96								\$839.88	They are receiving a 30% discount. remitted \$286.11
Fayette County		4/2021						\$14.52		\$99.34		\$138.76								\$252.62	
Floyd County	Discovered two circuits on the CenturyLink bill that are no longer needed and we have started the process to disconnect those trunks. Bill is hard to determine what charges are for what. Bill is not itemized and is really hard to decipher what charges are.																			\$0.00	
Floyd County	2 charges on bill - identical					\$55.14	1B	\$62.56	1B	\$139.84	1B									\$257.54	
Floyd County	2 charges on bill - identical					\$55.14	1B	\$62.56	1B	\$139.84	1B									\$257.54	
Floyd County			\$49.17			\$9.68		\$32.22					\$43.94		\$43.24		\$105.30	Toll service add-payment.		\$282.55	
Hamilton County	2 Kamrar circuits 8 bills for. See below.					\$18.33		\$11.42	RateXBPxMiles	\$47.64		\$34.10			\$115.00					\$226.45	
Hamilton County						\$18.33		\$11.42	RateXBPxMiles	\$47.64		\$34.10			\$115.00					\$226.45	
Hamilton County	2 Starhopp circuits 8 bills for. See below.					\$18.33		\$19.89	RateXBPxMiles	\$34.10		\$47.64			\$115.00					\$234.96	
Hamilton County						\$18.33		\$19.89	RateXBPxMiles	\$34.10		\$47.64			\$115.00					\$234.96	
Hamilton County	No itemized description of charges, just a bill with an amount.					\$177.92														\$177.92	
Hamilton County						\$43.46		\$49.96		\$102.99		\$143.84								\$340.25	
Hamilton County						\$43.46		\$49.96		\$102.99		\$143.84								\$340.25	
Hardin County	Quarterly invoice for Jan-March 2021. Not itemized except for ALI versus other costs	3/2021	\$120.00			\$360.00														\$480.00	
Hardin County	Email sent from lebo with the monthly amount. No bill.			No charges		\$313.57														\$313.57	
Hardin County	Email from Telco with projected charges. The current rate will be in effect for the 12 month rolling term and adjustments may be made at the end of a year.	7/2021				\$79.35			Hardin Co uses 36% of the circuits and are charged accordingly.											\$79.35	
Harrison County		6/2021	\$480.26			\$2,225.35							\$187.15	Surcharges and other Fees	\$93.66	Taxes				\$2,986.42	
Henry County		6/2021		NA		\$981.64		\$55.24	82	\$99.72	82	\$83.42	82							\$188.38	
Iowa County		11/2020		NA		\$981.64														\$981.64	
Iowa County		11/2020		NA		\$25.47		\$463.96		\$188.98		\$263.92								\$916.86	
Iowa County		11/2020	\$198.66			\$25.47		\$6.98		\$25.51										\$218.54	
Iowa County		11/2020				\$25.47				\$25.51			\$30.78	CMP INTRA VG 17X71%						\$81.76	
Jackson County	Andrea and LaBette have not billed us since 2016 due to a dispute over how much their bills went up. They could not really explain it so they just stopped billing. They said they intend to bill again when the State takes over. Per email addressed that they would bill the State \$213.36, have reflected this in the total circuit cost amount.	NA				\$213.36														\$213.36	
Jackson County	Cascade Communications provides telephone service in areas of Dubuque, Jones and Jackson counties. All of the 911 calls from our service area are routed over 3 circuits delivered to CenturyLink for completion to the appropriate PSAP. The County paying for 90% of the circuit fees may opt to remove one of the three trunks and that would reduce the costs for Jackson County by 33%. Telco has also agreed to reduce the total charges for the three circuits by 20% effective May 1, 2021, if one circuit is removed and with the 20% discount applied, the cost for Jackson County would be reduced from 145.48 to \$77.54 monthly.	Monthly Estimate	\$6.00	\$1.00 Per Record																\$6.00	10% of total costs
Jackson County		7/2021				\$93.22														\$93.22	
Jasper County	No itemized bill.	6/2021		NA		\$450.00														\$450.00	
Jasper County	No itemized bill.	6/2021		NA		\$468.18														\$468.18	

County	Notes	DATE	ALI Charges Amount	ALI Charges rate Info	CIRCUITS	911 Circuit Cost Amount	Channel Mileage (facility)Amount	Channel Mileage Rate Info	Channel Mileage Termination Amount	Channel Mileage Termination Rate Info	Channel Termination Amount	Channel Termination Rate Info	Other 1	Info on Other	Other 2	Info on Other	Other 3	Other4	Circuits TOTAL with ALL	Circuit Trunk Rate Info	Surcharge Remittance		
Jasper County	No itemized bill	6/20/21		NA		\$450.00															\$450.00		
Jasper County	No itemized bill	5/20/21		NA		\$1,552.92															\$1,552.92		
Jefferson County																						\$0.00	
Johnson County		4/20/21				\$21.00															\$21.00	3 month average	
Johnson County	This bill went up quite a bit from the prior month, and went from a simple bill with a one line charge to an itemized bill.	5/20/21					\$166.08		\$244.74		\$546.90										\$958.32	\$349.44	
Johnson County		6/20/21				\$69.00															\$69.00		
Johnson County		6/20/21	\$29.99			\$103.08			\$85.58		\$119.52										\$103.08	\$336.17	
Johnson County		5/20/21	\$1,113.65			\$101.88	\$13.92		\$102.04		\$101.88										\$101.88	\$1,433.32	
Johnson County		6/20/21				\$786.08															\$786.08		
Johnson County		6/20/21											\$718.81	Usage, recovery, 911 comm surcharge, regulatory assessment fee	\$85.50	Two Way Trunk Charge						\$157.31	
Jones County	No charges	Monthly Estimate																				\$0.00	
Jones County	No charges	Monthly Estimate																				\$0.00	
Jones County		Monthly Estimate				\$195.74	\$220.07		\$76.01													\$491.82	
Jones County	average cost very low	Monthly Estimate	\$28.00																			\$28.00	
Jones County		Monthly Estimate				\$132.06																\$132.06	
Jones County	No charges	Monthly Estimate																				\$0.00	
Jones County		Monthly Estimate				\$518.72																\$518.72	
Jones County		7/20/21				\$195.74	\$220.07		\$76.01													\$491.82	
Jones County	No charges	Monthly Estimate																				\$0.00	
Jones County		Monthly Estimate																				\$0.00	
Jones County		Monthly Estimate				\$102.30																\$102.30	
Jones County	currently billing Jones County for two 911 circuits for a total of \$491.82 per month based on our NECA rate Band 16 from 2014. Wyoming Mutual Telephone has elected to not increase rates billed to Jones county. The rates for 2021 would have been \$98.34 per month. No ALI charges.	Monthly Estimate				\$152.02	\$339.28	28 billable miles for the 2 circuits														\$491.82	WMTC collects \$1.00 per month per access line for E911 surcharge, we then remit that to Jones County with a 1% deduction for administrative fees. In the last quarter of 2020 we retained \$11.42.
Jones County	No ALI charges	Monthly Estimate				\$377.38	\$285.33															\$662.71	Both companies collect \$1.00 per month per access line for E911 surcharge, we then remit that to Jones County with a 1% deduction for administrative fees. In the first quarter of 2021 Onslow retained \$3.72 and Center Junction retained \$1.88.
Keokuk County		6/20/21		NA			\$463.86		\$188.98		\$263.92											\$916.86	
Keokuk County		6/20/21	\$8.00			\$344.80																\$352.80	
Keokuk County		7/20/21				\$916.86																\$916.86	
Keokuk County		5/20/21	\$93.78			\$1,220.36							\$16.24	Surcharges and Other Fees								\$1,330.38	
Keokuk County		4/20/21				\$191.74							\$13.00	Other charges and credits	\$66.09	Interstate Surcharges						\$270.83	
Kossuth County		7/20/21	\$25.00			\$77.25	\$66.00		\$55.30													\$223.56	
Kossuth County	Bill was not itemized	7/20/21				\$1,042.07																\$1,042.07	
Kossuth County	Bill was not itemized	7/20/21	\$20.00			\$150.00																\$170.00	
Kossuth County		7/20/21	\$50.00				\$473.78		\$478.38		\$668.08											\$1,670.24	
Kossuth County	Bill was not itemized	7/20/21				\$236.07																\$236.07	
Kossuth County		7/20/21	\$66.55			\$100.28	\$50.00															\$205.83	
Lousia County	Email with typical cost that was included in this row.	5/20/21				\$207.66																\$207.66	
Lousia County	Email from telco stating that they were being underbilled and the rate will be going up	7/20/21				\$256.07																\$256.07	
Marshall County	No itemized bill	3/20/21				\$265.28																\$265.28	no itemized bill
Monroe County	Looks like bills may be stopping	7/20/21				\$0.70																\$0.70	
Monroe County		7/20/21				\$39.98																\$39.98	
Monroe County		7/20/21	\$87.75																			\$87.75	
Montgomery County	Interconnect SR circuit to SCI Regional 911 from Lumen CB	7/20/21				\$54.17		\$25.83														\$80.00	
Montgomery County		7/20/21	\$36.80			\$223.54	\$116.09															\$376.93	
Montgomery County	Iowa 911 Circuits Qty 2 + 12 ALI Updates	7/20/21				\$161.21																\$161.21	

County	Notes	DATE	ALI Charges Amount	ALI Charges rate Info	CIRCUITS	F11 Circuit Cost Amount	Channel Mileage (facility)Amount	Channel Mileage Rate Info	Channel Mileage Termination Amount	Channel Mileage Termination Rate Info	Channel Termination Amount	Channel Termination Rate Info	Other 1	Info on Other	Other 2	Info on Other	Other 3	Other 4	Circuits TOTAL with ALL	Circuit Trunk Rate Info	Surcharge Remittance	
Montgomery County		7/20/21				\$70.35														\$70.35		
Muscatine County																				\$0.00		
O'Brien County		7/20/21					\$417.80		\$102.30		\$195.92			-\$143.20		service discount listed as other services				\$572.82		
O'Brien County		6/20/21				\$93.07								\$105.00						\$198.07		
O'Brien County		6/20/21	\$12.00			\$50.00	\$10.45		\$48.52		\$67.78									\$188.75		
O'Brien County	Not terminated	6/20/21				\$113.15														\$113.15		
O'Brien County	Not terminated	6/20/21				\$323.14														\$323.14		
Pottawattamie County	Summary of charges provided by the telco. These circuits would be for calls from our customers in Grand Bluffs, Teynor and Meccosona, falling within Pottawattamie County.	7/20/21	\$64.00	per month		\$870.00	\$28.92	per mile	\$289.69		\$404.57			\$164.02		signaling capability Optional feature only charged for if asked for.				\$1,621.20		
Poweshiek County		5/20/21		ALI updates @30 ea each, will continue to bill		\$134.20														\$216.70		
Poweshiek County	Agreed to go to a \$450 per month flat fee on future billing, per Dean Disney.	5/20/21		NA		\$1,239.94	\$1,043.87													\$2,283.41		
Ringgold County																				\$0.00		
Sac County		Monthly estimate from Telco	\$64.00			\$335.00														\$399.00		
Sac County		1/2/2020	\$163.40			\$348.69														\$812.06		
Sac County		7/21	\$109.20			\$375.66														\$485.86		
Sac County		7/20/21				\$14.00														\$14.00		
Sac County		6/20/21				\$808.68														\$808.68		
Sac County		6/20/21	\$120.89			\$237.38														\$358.27		
Scott County		7/20/21				\$115.43														\$265.47		
Scott County		5/20/21				\$120.28														\$285.75		
Story County		7/20/21				\$25.88			\$62.36		\$139.42									\$227.66		
Story County		7/20/21				\$10.30														\$10.30		
Story County		7/20/21	\$1,012.44			\$169.28														\$169.28		
Story County		7/20/21				\$651.78														\$1,664.22		
Tama County		5/20/21	\$484.00	242@87.00 ea		\$23.00			\$59.72		\$83.42		\$19.00			COE Translation				\$669.14		
Tama County		5/20/21				\$23.00			\$59.72		\$83.42		\$19.00			COE Translation				\$185.14		
Tama County			\$2.00			\$23.00	\$35.98		\$167.28											\$228.26		
Van Buren County	Per note on bill: There is a price reduction of \$263.92. The new account on this invoice and going forward is \$1,888.08. For 2-2 wire circuits for \$11 traffic to the aggregator.	4/20/21																		\$1,888.08	2 @ \$94.40 ea.	
Van Buren County		4/20/21																		\$0.00	99% of 91 m @ \$9.43	
Washington County		6/20/21				\$277.86	\$2	\$53.72	\$4	\$601.46	\$2									\$933.04		
Washington County		6/20/21	\$42.82			\$228.10														\$270.92		
Winnebago County	Looks to be a bill for 11 circuits, wilconline charges on this one line as changes are all the same with the exception of one circuit having charges for channel mileage, term, and mileage fac.	6/20/21	\$275.00	\$25 ea		\$550.00	\$72.80		\$66.06		\$92.28									\$1,655.96		
Winnebago County		5/20/21	\$36.30			\$87.94														\$123.84		
Winneshek County		5/20/21		NA		\$247.88		Not Specified												\$247.88		
Winneshek County	Both exchanges are switched out of Canton, MN	5/20/21		NA		\$264.78														\$264.78		
Winneshek County		5/20/21		NA		\$334.53														\$334.53		
Winneshek County		5/20/21	\$12.00	1.00 per		\$115.56														\$127.56		
Winneshek County	This bill is for the ES Trunks in the PSAP. We bill for service from the Central Office to the point of interface (POI) where your NextGen Provider is picking up the calls.	5/20/21		NA		\$90.75	\$47.83													\$1,010.58		
Woodbury County		7/20/21				\$579.01														\$579.01		
																				Monthly Total	\$93,000.50	
																				Total Doubled to account for missing counties	\$186,001.10	
																				Annual Total	\$2,232,013.20	
																				Range for Undocumented statewide costs (based on Woodbury and additional service line)	\$2,683,633.20	

Appendix B: Letter to PSAPs & Telephone Companies



March 26, 2021

Dear PSAP Managers and Iowa Telephone Providers,

Over the past two years, we have worked together to help merge the legacy landline 911 network onto the Next Generation 911 Network. That work is nearly complete. One item remains to work through, and that is the future financial arrangements. The enabling legislation regarding this effort, [HF 2254](#), (2018 Iowa Acts Ch 1076) indicated that the local Public Safety Answering Points (PSAPs) would no longer be responsible for the costs of wireline 911 service, and “such costs shall be addressed by the” Iowa Department of Homeland Security and Emergency Management (HSEMD).

Through the process of taking over those costs, HSEMD found a large disparity in total costs being charged as well as a wide variety of itemized cost categories. There is no single code section that references or identifies how costs are to be billed or costs recovered by telephone companies.

While acknowledging the various conversations surrounding this discussion both currently within the Iowa General Assembly as well as occurring in other States and at the Federal Communications Commission (FCC) level, we want to continue working towards an amicable resolution in Iowa. ***It is still the intent of HSEMD to address these costs—making them no longer a responsibility of the local PSAP.*** However, to do that, we have jointly determined there is not a reporting mechanism currently in place to identify the aggregate total of these costs. Further complicating this matter are federal Customer Proprietary Network Information (CPNI) rules prohibiting the direct release of costs by telco’s directly to HSEMD, which is not considered the “customer” at this point. This is where we are asking for everyone’s cooperation and participation to reach our end goals.

Both HSEMD and the Iowa Communications Alliance are encouraging PSAPs and telephone providers to engage in local conversations to:

1. Accurately determine the basis for the current bills and costs being charged. This also serves to educate both parties on the current infrastructure in place.
2. Identify what, if anything, is no longer needed for 911 call delivery and submit the appropriate circuit or other related 911 service disconnect orders to the service provider.
3. Determine the process for any future modifications to the named account holder for the active circuits needed for 911 call delivery, to prepare for the anticipated migration to HSMED, to provide statewide consistency, and a uniform process for future discussion and/or changes.

4. Agree on a reasonable baseline of monthly recurring costs based on updated actual need/infrastructure.
5. Provide accurate and unique identifiers for still necessary 911 circuits for accurate billing and future reference by all parties.

We are requesting that these conversations happen before the end of May.

We also ask that in addition to the above conversations that telephone providers collaborate using best practices for automated ALI uploads, potentially removing that cost altogether.

Additionally, we ask that telephone companies work with their billing agencies to accurately itemize their 911 billing into four different categories, if not already doing so. The four categories are as follows:

1. 911 Circuit Costs, including the unique circuit ID information
2. Mileage charges
3. ALI Costs
4. Administrative line service (This line item is not in question, and not part of the 911 migration efforts whatsoever. This cost would still be a cost to the local PSAP. We have found that in some cases, this fee is incorporated or “lumped together” with other 911 charges, and this needs to be split out.)

We are requesting that these billing practices be adopted within 1-2 months, for a timeframe of the end of July.

We are then further requesting PSAPs/911 Service Boards forward their new invoices to HSEMD so we can develop a statewide aggregated cost. The development of that statewide aggregated cost will drive future action to better allow HSEMD to address these costs.

We acknowledge this is an aggressive implementation schedule. However, this gives us time to collaborate before the next legislative session, should anything need to be done within Iowa Code 34A, or any other relevant Iowa law to further address the topic.

We greatly appreciate everyone’s efforts on this project thus far, and look forward to continued discussion and work to improve 911 in Iowa.

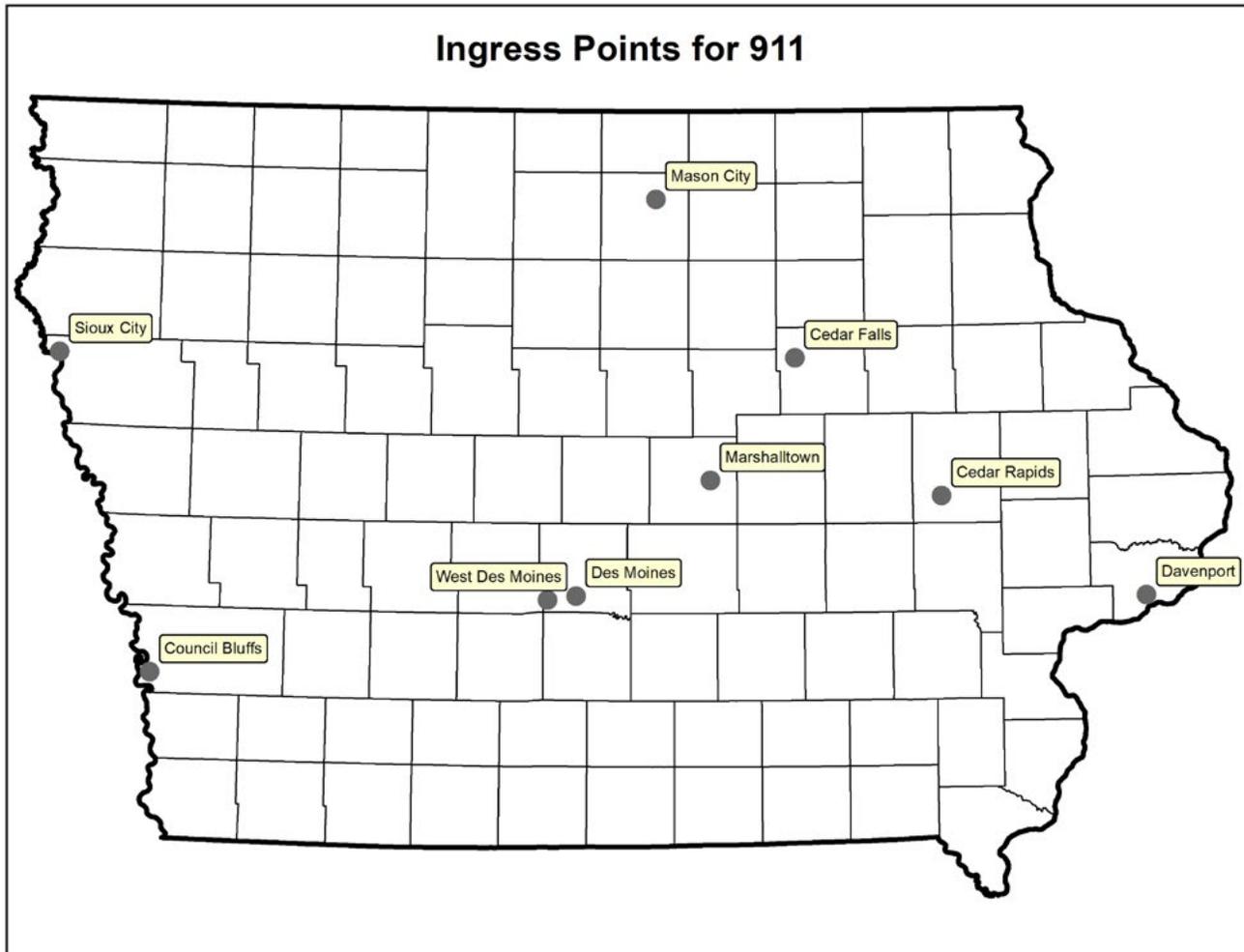


Blake DeRouchey
911 Program Manager



Dave Duncan
CEO, Iowa Communications Alliance

Appendix C: Ingress Points for 911



Cost recovery refers to the expenses Originating Service Providers (OSPs) incur to deliver the 911 call from the caller into the State's points of ingress for the 911 system. OSPs are required by federal law to deliver 911 calls. Restated another way, "Who is fiscally responsible for getting 911 calls into the State's 911 system?" This is the specific portion of wireline call flow in question regarding who is financially responsible.

There is ambiguity within Iowa Code regarding Wireline Cost Recovery. Traditionally, PSAPs have reimbursed wireline carriers for fees associated with delivering 911 calls to the PSAP.

Wireless Cost Recovery is not a primary focus point of this report. The FCC does not require states to reimburse wireless carriers for cost recovery, but does allow states who want to reimburse this cost to do so. Per Iowa Code, Wireless Cost Recovery eligibility is set to sunset in 2026.

The costs associated with the portion of the call flow from the State's 911 points of ingress to the PSAP for call answering and dispatch are not in question and are paid for by HSEMD.

Appendix D: Glossary

ALI: Automatic Location Information

ANI: Automatic Number Information

Channel Mileage Facilites: Cost associated with the distance from the Local Exchange Office to the aggregation point or legacy Selective Router, which is the ingress point into the State's 911 system

Channel Mileage Termination: Cost associated with managing the 911 traffic and equipment within the Local Exchange Office

Channel Mileage: Cost associated with the distance for a communications channel to travel from the central office to end office

Channel Termination: Cost associated with the local connections from the end user/customer to the Local Exchange Office

CFR: Code of Federal Regulations

CPNI: Customer Proprietary Network Information

FCC: Federal Communications Commission

HSEMD: Iowa Department of Homeland Security and Emergency Management

ICA: Iowa Communications Alliance

ICN: Iowa Communications Network

NECA: National Exchange Carrier Association

OSP: Originating Service Provider: A communications provider that allows its users or subscribers to originate 911 voice or nonvoice messages from the public to public safety answering points, including but not limited to wireline, wireless, and voice over internet protocol services

PSAP: Public Safety Answering Point