

December 28, 2012

Brian Tagaban, Executive Director
Navajo Nation Telecommunication Regulatory Commission
Morgan Blvd
Building #2740, Training Center
Window Rock, AZ 86515

Mr. Tagaban,

Frontier Communications Corporation is pleased to present our comments via the Navajo Nations Public Notice inquiry: **No. NNTRC-12-002 Notice of Inquiry in the matter of Navajo Nation 911 Service and Public Service Answering Point (PSAP).**

We view this Request for Inquiry as an opportunity to create, and enhance a successful partnership throughout the upcoming years. Frontier draws upon the talents of over fourteen thousand full time telecommunications professionals, including experts in voice and data engineering, installation, maintenance, training and customer services. Locally, we have implemented and supported numerous 911 systems in Mohave and Navajo Counties for over twenty years.

Key Frontier Communication's differentiators:

E911 Solution Provider: Partnering with Cassidian Communications, Frontier Communications is an industry leader in providing E911 services and solutions. We currently support over 200 customers nationwide.

Financial Strength and Stability: We bring a solid blend of financial strength and local presence (2,500+ employees). We are one of the nation's most trusted and respected organizations, delivering proven solutions.

Personal Service and Local Support: Our account management philosophy is designed for your success. Our Customer Care Team is committed to achieving high levels of customer satisfaction and to resolving problems quickly and efficiently. You will receive account management support along with voice, data, network, broadband, HSI, and customer premises equipment engineers.

Our executive staff is also committed to your success and is accessible at any time. We sincerely appreciate your consideration and look forward to future opportunities providing services to meet your hardware, network, and data E911 requirements. Please do not hesitate to contact us if you need more information or have questions.

Respectfully,

William Le Poidevin
United States West Region E911 CPE Specialist

NOTICE OF INQUIRY

1. The Navajo Nation Telecommunications Regulatory Commission (“NNTRC”) is authorized by the Navajo Nation Council to establish and enforce rules, regulations and policies, and issue orders as necessary for the health and safety of the general public in regard to telecommunications matters, including such rules, regulations, policies or orders as are necessary for the establishment of Enhanced 911 (E911) or Next Generation 911 (NG911) on the Navajo Nation. *See* 2 N.N.C. § 3453(B)(2); *see also* 21 N.N.C. § 514(A).

Frontier Communications read and understood

2. The NNTRC is established as an independent Commission under the Office of the President and the Vice-President pursuant to 2 N.N.C. § 3451.

Frontier Communications read and understood

3. On July 25, 2011, the Law and Order Committee of the Navajo Nation Council received reports from the NNTRC, the Division of Community Development, and the Department of Public Safety (DPS) concerning the current status of the Nation’s emergency calling response system. As a result of those reports, the Committee recommended that the Office of the President create an action plan to address the lack of E911 services on the Nation.

Frontier Communications read and understood

4. Pursuant to its statutory authority under Navajo law, and based on the critical need for E911 or NG911 services on the Navajo Nation, as addressed in the Findings, below, NNTRC is hereby publishing a Notice of Inquiry regarding the establishment of one or more Public Safety Answering Points (PSAPs) on the Navajo Nation, development and completion of an E911 or NG911 Service Plan, and implementation of E911 or NG911 services on the Navajo Nation.

Frontier Communications read and understood

5. In this proceeding, the NNTRC seeks input from stakeholders, including federal, state, county, municipal and tribal governments and their agencies (including Navajo Nation 2 agencies, and the Indian Health Service and the Bureau of Indian Affairs), telecommunications service providers, and the public.

Frontier Communications read and understood

Findings

6. 911 Emergency Service is absolutely critical in order to meet the basic health and safety needs of the Navajo people. Without 911 service, first responders, including police, fire and ambulance, are unable to quickly locate and respond to the emergency needs of the Navajo people.

Frontier Communications read and understood

7. The Navajo Nation does not have even Basic 911 Emergency Service, let alone

E911, and also does not have any operational PSAPs within the territorial jurisdiction of the Navajo Nation.

Frontier Communications read and understood

8. When an emergency call is received from a wireline or wireless telephone on the Navajo Nation, it is received on an administrative telephone line where additional information is unavailable, such as identity and address. E911 technology is crucial for dispatchers to relay emergency information to first responders.

Frontier Communications read and understood

9. As a result of no E911 services on the Navajo Nation, many emergency situations are grossly prolonged, and may result in additional injury, or even death.

Frontier Communications read and understood

10. Over the past decades, the Nation has made at least two concerted yet so far unsuccessful efforts to implement 911 services on the Navajo Nation.

Frontier Communications read and understood

11. In order to implement E911 and receive state funding from Arizona and New Mexico for such services, the Navajo Nation must develop a Service Plan which meets those states' requirements. So far, the Nation has been unsuccessful in completing a Service Plan which meets those requirements.

Frontier Communications read and understood

12. So far, no such action plan has yet been created.

Frontier Communications read and understood

13. There is also no designated lead agency within the Navajo Nation government to ensure that an action plan is developed and successfully implemented.

Frontier Communications read and understood

14. On August 18, 2011, the NNTRC held a regular meeting to hear reports from the Executive Director of NNTRC and from officers for DPS concerning the lack of E911 services.

Frontier Communications read and understood

15. Based on the July 25, 2011 directive from the Law and Order Committee, and the reports made to NNTRC on August 18, 2011, the NNTRC is opening this Inquiry in order to facilitate the effective implementation of oversight, funding, construction, development and administration of one or more PSAPS on the Navajo Nation, and their associated Service Plans.

The NNTRC seeks comments and input on the following questions.

Frontier Communications read and understood

Discussion

16. How can the Navajo Nation ensure that the E911 model adopted by the Nation is the most advanced available, taking into consideration the current rule making regarding NG911 by the Federal Communications Commission in PS Docket No. 11-153 and 10-255?

Frontier Communications has a broad knowledge base in installing and maintaining e911 Centers in Navajo and Mohave Counties for over 20 years. Frontier Communications and its E911 partners will work with the Navajo Nation and we will decide together on the best platform that will meet the needs of its community. It would be agreed that the best platform will depend many factors. The most important factor is to make sure lives are not lost by any system that is chosen.

17. What is required for successful administration of a 911 system? The NNTRC envisions three main separate components in the administration of E911 system. The three components are the PSAP, Master Street Addressing Guide (MSAG), and Rural Addressing. Can the three components be managed separately by independent agencies or departments, or should the entire E911 solution be managed by only one agency or department?

Frontier Communications believes the management by one entity would be the best course of action.

18. Who should develop and negotiate the Service Plan(s)? Who should be the lead agency? How often does the service plan need to be modified and what aspects of service plan require agreements to be maintained and updated?

At present the Service Plan must be resubmitted by the Navajo Nations to the State of Arizona to get approval. Frontier Communications will provide assistance in helping the Navajo Nation to submit a Service Plan to the State of Arizona. Without an approved Service Plan, there can not be a place to start in developing an E911 platform for the Navajo Nations. This is critical to be completed.

19. Who should approve the Service Plan(s)? Is it acceptable that the NNTRC be designated as the entity that can adopt and approve modifications to the service plan? Does the adoption or modification of the service plan require additional approval by the Navajo Nation Council or one or more of its standing committees? Should the NNTRC consider chartering an advisory committee explicitly to review and make recommended modifications to the service plan?

The Service Plan must be submitted to the State Of Arizona and they must give the Navajo Nations direction on the approval or feedback on what else is needed for approval. Frontier Communications will help the Navajo Nations with this process.

20. How should NNTRC oversee and fund PSAPs and E911 services? Should the NNTRC have direct operational control of the PSAP and other components of E911? How should collect funds be made available to localities or agencies providing an any aspect of 911 services?

Once compliance is established by the Navajo Nations via the Service Plan, ALI compliance, and MSAG compliance; Monies will be allocated based on the population base that the e911 centers will influence. 911 funds are tightly regulated if monies are to be provided by the State of Arizona. Any additional monies that are funded outside the State of Arizona's influence should be the responsibility of the Navajo Nations. Intuitively, monies that are earmarked for e911 services should go to the purchasing and maintaining the 911 infrastructure

21. Should the Nation implement an E911 tax? If an E911 tax is implemented who should be exempt from such taxes? Should E911 tax be percentage or surcharge per line? How should the tax or surcharge be determined and how often should the tax or surcharge be adjusted?

This question should be given to the State of Arizona. Their accountability to providing 911 services is paramount and their knowledge on driving funds to support 911 services is extensive. Barbara Jeager and Maria Hall our key contacts at the State of AZ.

22. What should be fundable with an E911 tax? E.g. Facility Management (Environment Services, Construction, Rental, Improvements), Call Center Equipment (Purchase, Support Contracts, Chairs, Desks, Filing & Office Supplies), Call Center Network (Monitoring Devices, Interface Equipment, Backup & Disaster Recovery, Compliance Equipment, Software Licensing), Administrative costs.

All taxes generating for a comprehensive e911 solution should be used. Depending how much can be raised via the taxes is the limiting criteria to what can be purchased. The State of AZ will have guidelines on how the money should be spent which covers items that qualify and what items will need to be paid by the PSAP.

23. Who should operate and administer PSAPS? Should any other entity be involved in the operation besides the Navajo DPS? Can portions of the PSAP operations be outsourced to private entities as a cost savings or risk management mitigation solution?

There are many models of 911 Management that can be utilized. The Navajo Nations should consider all options that will ultimately provide the best support, maintenance, effectiveness, and provides the lowest cost of ownership.

24. Should the Nation manage the MSAG database within the Nation or should the Nation outsource the management of the MSAG database to a private entity?

This depends on resources.

25. Who are the stakeholders, including governmental agencies? The NNTRC seeks comments on listing of stakeholder to ensure the service plan stakeholder listing is complete.

The State of Arizona 911 Division is the only and primary stakeholder.

26. What entity should be responsible for collecting and maintaining contact information of stakeholder agencies (state, county, municipal, tribal, federal)?

Navajo Nations ultimately will choose a business partner to implement their e911 services. If Frontier Communications is selected, we will be working closely with the Navajo Nations on coordinating best business practices. This will be a fluid process and cannot be determined at present. Frontier Communications will follow the State Of Arizona guidelines in providing 911 services.

27. What information from stakeholders should be shared? What information should be maintained as confidential information from stakeholders?

911 Services is a public resource – any monies derived by the State will have to be publically noted for accountability and information pursuant will have to be public as well.

28. How can coordination among stakeholders be best facilitated?

Once we have an approved Service Plan and compliance for e911 services the coordination amongst stakeholders should be self evident via the Service Plan submitted.

29. What is the current status of the Service Plan? How can the development of a Service Plan be best accomplished?

The Navajo Nations Service Plan is not approved. The Navajo Nations will need to allocate a team of people to evaluate service plan and determine what else is needed. Frontier Communications can step in to advise from a consultative position.

30. How many PSAPs should there be and where should they be located?

This decision will be dependent on population and geographic infrastructure. This should be coordinated decision between the State of Arizona, Navajo Nations, and the 911 providers of network, hardware, and maintenance.

31. What data should be kept on first response statistics?

Again, there are guidelines that will need to be adhered via the State of Arizona statutes. Additional statistics can be utilized by the Navajo Nations.

Ordering Clause