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 IDAHO PUBLIC
 UTILITIES COMMISSION

Attorney for Commission Staff

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE APPLICATION)	
OF THE COMMISSION STAFF FOR AN)	CASE NO. GNR-T-16-04
ORDER APPROVING THE DISPOSITION)	
OF TIER 2 FUNDS FROM THE QWEST)	APPLICATION OF THE
PERFORMANCE ASSURANCE PLAN (QPAP)	COMMISSION STAFF
OR PLAN))	
)	

The Commission Staff files this Application requesting that the Commission authorize the disbursement of the remaining balance of Tier 2 funds under the Qwest Performance Assurance Plan (QPAP) to fund two telecommunication projects: (1) an expansion of the Idaho Suicide Prevention Hotline administered by the Idaho Department of Health & Welfare, Division of Behavioral Health; and (2) the development of standardized training and certification for 911 dispatchers by the Idaho Emergency Communications Commission, through the Idaho Peace Officer Standards & Training (POST) Academy. Staff proposes that remaining balance of the QPAP fund in the amount of \$89,710 be equally distributed to these two projects.

Staff recommends that this Application be processed under Modified Procedure pursuant to Rule 201, *et seq.*, and requests that written comments regarding the Application be filed within 21 days.

BACKGROUND

Section 271 of the federal Telecommunications Act of 1996 established procedures for CenturyLink’s predecessor Qwest Corporation (commonly referred to as a Bell Operating Company (BOC)) to obtain authorization from the Federal Communications Commission (FCC)

to provide in-region interLATA and interstate telecommunications services. 47 U.S.C. § 271. In particular, Section 271(c)(2)(B) contained a “competitive checklist” that generally provided that Qwest and other BOCs must provide access and interconnection to competitors. Before allowing Qwest to offer telecommunications services in its region, the FCC was also required to find that allowing Qwest to compete in its region against competitors “is consistent with the public interest, convenience and necessity.” 47 U.S.C. § 271(d)(3)(C). To ensure continued compliance with the competitive checklist, the FCC determined that applicable carriers should develop and implement a “Performance Assurance Plan” (PAP). As this Commission noted in February 2003, “Qwest’s PAP provides specific standards for [Qwest’s] delivery of services to competitor telecommunications providers and automatic penalties if the standards are not met.” Notice of Modified Procedure (Case No. USW-T-00-03).

Qwest’s PAP (QPAP) was intended to provide economic incentives for Qwest to provide non-discriminatory service to competitive local exchange carriers (CLECs). Order No. 32106 at 1. In the event Qwest failed to meet the performance standards set out in its QPAP, the Plan required that Qwest make remedial payments to either the CLECs or to a Fund established by the state regulatory commission. These payments were divided into two self-executing types. First, Tier 1 payments were made to a particular CLEC if Qwest did not meet the service standards when providing service or access to that CLEC. QPAP § 2.1. Second, if Qwest failed to meet certain other service standards that did not directly impact a particular CLEC, Qwest was required to make Tier 2 payments to accounts established by the state commission. QPAP § 2.1.1; Order No. 30461 at 3.

Tier 2 payments were made to one of two accounts. The Tier 2 “special fund” was used to defray audit and oversight expenses incurred by this Commission in reviewing Qwest’s Section 271 compliance. The Tier 2 “discretionary fund” was comprised of remedial and intended to be used for “competitively neutral Idaho telecommunications initiatives.” QPAP § 11.3.4. Payments to the Tier 2 accounts were discontinued in November 2010. Order No. 32106 at 2-3. The current balance of the consolidated Tier 2 accounts is \$89,710.56 as of April 1, 2016. Given the discontinuance of Tier 2 payments, there is no longer a need to retain these funds. Consequently, Staff believes it is now appropriate to disburse the funds to the two telecommunications programs identified in greater detail below.

APPLICATION

Staff recommends that the Commission equally distribute the balance of the Tier 2 QPAP funds to the two programs set out in greater detail below. The first program would expand the operations of the Idaho Suicide Prevention Hotline administered by the Department of Health & Welfare, Division of Behavioral Health. The second program would provide initial funding for the development of certification standards and training at the Idaho Police Officer Standards & Training (POST) Academy for emergency dispatchers assigned to 911 calling centers.

A. Idaho Suicide Prevention Hotline

The Idaho Department of Health & Welfare, Division of Behavioral Health, administers the Idaho Suicide Prevention Hotline. According to statistics from the Suicide Prevention Action Network of Idaho, suicide is the second leading cause of death for Idahoans age 15-34.¹ In a report issued this month by the Centers for Disease Control and Prevention (CDC), the National Center for Health Statistics reported that deaths from suicide increased from 1996 to 2014 by 24%, from 10.5 to 13.0 per 100,000 population.² The average annual percentage increase in suicide mortality shows that the average increase was greater for the period 2006-2014 than for the period 1999-2006. Increases in suicide rates occurred for both males and females in all age groups except 75 years and older. The increase for females was greatest for those ages 10-14, and for males between 45-64 years old. *Id.*

The Department of Health & Welfare has identified four special at-risk groups in Idaho. The first of these at-risk groups for suicide is male teenagers between the ages of 15 and 17 years old.³ According to a recent survey, one in seven Idaho high school students said they had seriously considered suicide.⁴ According to the Idaho Suicide Prevention Hotline, "Idaho's

¹ <http://healthandwelfare.idaho.gov/Portals/0/Medical/Suicide%20Prevention/August2015SuicideFactSheet.pdf> (last viewed April 21, 2016).

² *Increase in Suicide in the United States, 1999-2014*, NCHS Data Brief No. 241, <http://www.cdc.gov/nchs/products/databriefs/db241.htm> (last viewed April 22, 2016).

³ The other three special at-risk groups are Native American males, 15-24 years old; working age males, between the ages of 18-64; and elderly men, age 75 and older. <http://healthandwelfare.idaho.gov/Families/SuicidePrevention/SpecialAtRiskPopulationsinIdaho/tabid/1923/Default.aspx> (last viewed April 21, 2016).

⁴ <http://www.spanidaho.org/Idaho-suicide-facts> (last viewed April 22, 2016).

overall suicide rate is 52% higher than the national average and the youth[s] age 10-19 is double the national average.” Exh. 1, p. 2.

To address this priority at-risk group, the Suicide Prevention Hotline proposes to launch a new service called “Texts for Life” to reach people who are more comfortable texting or using an on-line chat service. While this new service will be available to all Idaho residents, “the focus is on increasing support for youth and other groups who favor these technologies, such as veterans.” *Id.* Funds from the QPAP program will improve the technological/telecommunications capacity to handle several thousand text messages as well as chats and calls from those in crisis.

The Division of Behavioral Health has proposed utilizing approximately \$44,900 of QPAP funds to improve their telecommunications capacity. *Id.* In particular, the Division proposes to use the money to procure the following equipment and facilities:

1. \$18,000 to build and equip six additional workstations with telephones, computers, power-jack wiring.
2. \$6,000 to improve acoustic dampening between and among the existing responder workstations and the new workstations.
3. \$4,000 for two LED wall displays showing the waiting queue for calls and texts.
4. \$4,000 for ICAROL IT software to provide crisis texts & chat functionality and voice-call management for one year.
5. \$5,000 for access and security systems.
6. \$7,900 for office supplies, other equipment, and administrative management.

The Division asserts that this added functionality will improve efforts to prevent suicides by effective intervention.

B. Idaho Emergency Communications Training Standards

The Idaho Emergency Communications Commission (IECC)⁵ proposes to utilize \$44,910 of QPAP funding to develop employment and training standards, including certification and recertification requirements, for emergency dispatchers located at public safety call centers (911 centers). Exh. 2.

⁵ Effective July 1, 2016, the functions of the IECC and the Statewide Interoperability Executive Council (SIEC) are to be consolidated into the Idaho Public Safety Communications Commission. See *Idaho Code* § 31-4815.

The Police Officer Standards & Training (POST) Academy has a voluntary dispatcher training program but desires to develop the necessary training standards for employment, training, and certification of emergency dispatchers. Exh. 2. The IECC estimates the funds necessary to fully develop this mandatory certification program is about \$10,000 per year. Utilizing available QPAP funds would provide the necessary funding for approximately four years while other funding solutions are identified. Exh. 2 at p. 2. Funds would be transferred to the IECC and eventually to the POST Academy.

Staff believes that the available QPAP funds can be put to good use by funding these two programs. Staff's request to fund these programs is competitively and technologically neutral, and in the public interest. Accordingly, Staff recommends that the Commission disburse the funds to the Idaho Department of Health & Welfare, Division of Behavioral Services and to the IECC, Post Academy, which will administer these funds. Use of the Tier 2 QPAP funds to support these innovative projects will serve Idaho citizens.

MODIFIED PROCEDURE

Staff believes that a technical hearing is not necessary to consider the disbursement of Tier 2 QPAP funds and respectfully requests that this Application be processed under Modified Procedure; i.e., by written submissions rather than by hearing. Rule 201 *et seq.* If the Commission determines that a technical hearing is required, then Staff stands ready to present testimony including support from the Idaho Suicide Prevention Hotline and the Idaho Emergency Communications Commission.

COMMUNICATIONS AND SERVICE

Communications regarding this Application should be sent to the following:

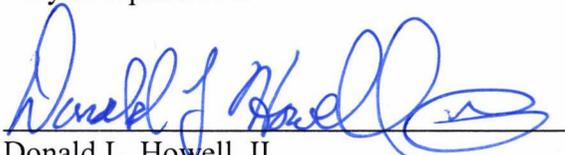
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REQUEST FOR RELIEF

Staff respectfully requests that the Commission issue an Order authorizing the disbursement of Tier 2 QPAP funds in the amount of \$89,710 to the two programs as described above in greater detail.

Respectfully submitted this 27th day of April 2016.



Donald L. Howell, II
Deputy Attorney General

bls/N:GNR-T-16-04_don



IDAHO DEPARTMENT OF
HEALTH & WELFARE

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DATE

Carolee Hall, Utility Analyst
Idaho Public Utilities Commission
Address
P.O. Box
Boise, ID

Dear Ms. Hall,

The Division of Behavioral would like to thank the Idaho Public Utilities Commission for their generous donation in support of the Idaho Suicide Prevention Hotline. In keeping with the intention of the donation, the Division intends to use the funding for the following:

- Additional responder stations
- Implementation of Crisis Text & Chat Response program
- Support full capacity operation of Suicide Hotline services

If you have further questions, please contact Treena Clark, Program Manager, Division of Behavioral Health at 334-6611



Twice as many Idaho youth die from suicide than US average

If you are a young person in Idaho there are a couple of different ways you might die. Most people would guess the most common way is in an accident, but shockingly, the second most common way for you to die is for you to kill yourself. In a recent survey, **one in seven** Idaho high school students said they have **seriously considered suicide**. Between 2010 and 2014, 96 Idaho children, age 18 or younger, died by suicide; many more, perhaps as high as 25 times as many, attempted suicide. Idaho's overall suicide rate is 52% higher than the national average and the rate for youth age 10-19 is double the national average. Yet research shows that with effective interventions, suicides can be prevented.

In early 2016, in partnership with the Public Utilities Commission, the Idaho Suicide Prevention Hotline will take a major step to help young people throughout the state who are in crisis. ISPH will launch a new service called **Texts for Life** (working title) so we can reach people who are more comfortable texting or using an online chat service. While this service will be available to everyone, the focus is on increasing support for youth and other groups who favor these technologies, such as veterans. With additional funding we can build our technological capacity to handle an anticipated several thousand text messages as well as chats and increased calls from youth in crisis.

- 6 additional work/responder stations at \$3000 per to include telephones, computers, cubicles, computer and power jack wiring & dual monitors: \$18,000
- Improved acoustical dampening between existing and new responder stations: \$6,000
- Jannus federally approved indirect rate of 13.6%: \$6,106
- 2 Smart LED wall displays for queue monitoring, installed, 50 inch or greater: \$4,000
- Icarol IT subscription- provides crisis text & chat functionality & voice call management for one year: \$4,000
- Upgraded controlled access & security system for call center: \$5,000
- New commercial grade front door & installation: \$1,100
- Additional office supplies: \$694.

Total: \$44,900

March 29, 2016

Carolee Hall
Idaho Public Utilities Commission
P.O. Box 83720
Boise, ID 83720-0074

Dear Ms. Hall:

It was a pleasure speaking with you this afternoon. As I explained, I am a commissioner on the Idaho Emergency Communications Commission (IECC) and as a result, I chair their PSAP Standards & Training Sub-Committee. The following is pulled directly from the PSAP Committee by-laws: *“The purpose of the PSAP Committee is to assist the IECC in accomplishing their Goals, Strategies, and Outcomes of their adopted Strategic Plan, which includes, but is not limited to:*

- *Developing an annual work plan for approval by the IECC.*
- *Identifying options and methods for public safety dispatcher certification and re-certification in Idaho.*
- *Identifying minimum training standards and model of credentialing process for public safety dispatchers within the State of Idaho.*
- *Assisting in the identification of the issues and opportunities with emerging technologies.*
- *Assisting the IECC with fulfilling its mission statement by identifying professional development opportunities and training.”*

The third bullet point is the Committee’s biggest task. There are approximately 34 states that mandate minimum hiring and training certification standards for emergency dispatchers, with 5 additional states pending. Idaho is one of the states where it is not mandated. APCO (Association of Public Safety Communications Officials) International’s ProCHRT (Professional Communications Human Resource Taskforce) Core Principles Manifesto states “every state mandate and/or adopt standard criterion for 9-1-1 public safety call taker and dispatcher training, using APCO ANS 3.103.1-2010: Minimum Training Standards for Public Safety Telecommunicators as a baseline, accredited by American National Standards Institute (ANSI), for certification and re-certification to maintain the highest level of knowledge, skill and ability.”

Obviously, ensuring there are mandated hiring and training standards, with a certification and recertification requirement, is critically important to ensuring a safer, more effective and professional emergency dispatch system. On September 4, 2014, the IECC met in Lewiston and during the meeting, I brought up the mandatory dispatcher certification/re-certification issue and asked the IECC to either reaffirm their position on it, or remove it from our by-laws. The IECC voted unanimously to continue to stand in support of Idaho requiring certification/re-certification, including minimum hiring and training standards of its public safety dispatchers.

It is remarkable that Idaho requires certification of nail technicians, hairdressers, food service workers, and many more, but our state’s public safety communications professionals are not

required to complete and maintain any formal training, receive a certification, or meet a minimum hiring standard.

The Idaho Peace Officer Standards & Training (POST) academy does have a dispatch academy and certification, but it is voluntary. The PSAP Committee has worked very hard, with the support of the IECC, Idaho Sheriff's Association, Idaho Chiefs of Police Association, Idaho Association of Counties, Idaho Association of Cities, and other stakeholders, and we believe we have built a great proposal. We anticipate the proposal moving before the 2017 legislative session and have several legislators prepared to move this issue forward.

The PSAP Committee proposal can be viewed at:
<http://bhs.idaho.gov/Pages/ECC/PsapBusiness.aspx>

The PSAP Committee consists of hard-working, dedicated professionals from agencies all over Idaho and I cannot overstate their passion and drive to represent both their profession and its needs in as balanced a way as they can.

The incurred costs to POST for the administration of this proposed mandate is estimated to be just shy of \$10,000 per year. The \$10,000 is for the processing of certification applications, auditing training/hiring records, and potential decertification issues. Without a funding source for these costs, POST is likely to oppose the legislation. While we recognize this needs to be an ongoing \$10,000 for each year, your contribution of the remaining \$44,910 would assure funding for at least 4 years while another solution is identified. I presume the funding would funnel through the IECC, then on to POST, but perhaps we can clarify how this would need to occur if the monies can be awarded. Thank you for your consideration of this noble and worthy project.

Sincerely,

Lt. Kevin Haight
ISP Statewide Communications
Idaho Emergency Communications Commissioner
Idaho PSAP Standards & Training Committee - Chairman
700 S. Stratford Dr.
Meridian, ID. 83642

CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT I HAVE THIS 27th DAY OF APRIL 2016, SERVED THE FOREGOING **APPLICATION OF THE COMMISSION STAFF**, IN CASE NO. GNR-T-16-04, BY MAILING A COPY THEREOF, POSTAGE PREPAID, TO THE FOLLOWING:

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