

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF SOUTH DAKOTA

In the Matter of the Petition for a)	
Declaratory Ruling Determining)	TC17-063
Responsibility for Rural Carrier)	
Interconnection to the)	Comments on Petition
Next Generation 9-1-1 System)	for Declaratory Ruling

The South Dakota 911 Coordination Board (hereinafter “the Board”), wishes to provide the following as initial comments on its Petition for Declaratory Ruling as titled above:

The Board has been working to bring a Next Generation 9-1-1 (NG9-1-1) system to South Dakota since legislative approval for the project was passed in 2012. All non-tribal public safety answering points (PSAPs) in South Dakota have received the updated hardware necessary for NG9-1-1. The first PSAP cutover to the new NG9-1-1 Emergency Services Internet Protocol Network (ESI net) system is scheduled for March of 2018. The entire project, as currently scheduled, should be completed within a year.

The Board’s understanding at the time of the Petition’s filing was that valid requests for interconnection had been sent to and received by all the rural carriers represented by SDTA. All other carriers within South Dakota have agreed to connect to the NG9-1-1 system at either or both of its points of ingress, which are located in Sioux Falls and Rapid City.

The issue, as understood by the Board, was whether or not it was technically feasible or unduly burdensome for SDTA’s members to connect to the NG9-1-1 system outside their service areas as provided in SDCL 49-31-79, and the referenced federal provisions. As these are the criteria that allow rural carriers to be exempted from the

normal requirement that all carriers agree to interconnection requests; and under the same statute, rural carriers may voluntarily agree to interconnection requests, the Board participated in and facilitated good faith discussions to address the concerns brought to its attention.

The Board filed this Petition before the Commission, because after discussions between and among the Board, NextGen, and SDTA taking place over more than a year no resolution had been reached.

The Board's interest in this subject is the timely deployment of the NG9-1-1 system to all participating South Dakota PSAPs. NG9-1-1 brings improved emergency service response to 9-1-1 callers. Citizens served by carriers not connected to the NG9-1-1 system will not have their 9-1-1 calls directly transported to the NG9-1-1 network. The Board views this as a public safety issue and looks forward to a decision by the Commission resolving the issues presented so that the NG9-1-1 project can move forward.

Respectfully submitted this 11th day of December, 2017

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