

SB 2074

**MAKING AN APPROPRIATION FOR DEVELOPMENT OF A NON-EMERGENCY
REPORTING SYSTEM, KNOWN AS 3-1-1**

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Chair Ige and Members of the Senate Committee on Intergovernmental Affairs:

I am Joel Matsunaga, testifying on behalf of Hawaiian Telcom on SB 2074, "MAKING AN APPROPRIATION FOR DEVELOPMENT OF A NON-EMERGENCY REPORTING SYSTEM, KNOWN AS 3-1-1." Hawaii Telcom supports this bill with amendments.

While Hawaiian Telcom recognizes the benefits of separating non-emergency telephone calls from statewide Enhanced 911 (hereinafter "911") emergency network, we do not believe that an additional telephone surcharge (as required by this bill) is necessary to finance this endeavor. Presently, all of the neighbor island counties already separate their non-emergency calls from calls to the statewide E911 system.

Neighbor island residents simply call a separate seven-digit number for non-emergency calls—leaving 911 for emergency calls only. These separate non-emergency calls are handled without the assistance of any funding from a new telephone surcharge imposed on residents and businesses. Similar to what currently exists on the neighbor islands, we believe that the City and County of Honolulu may also establish a non-emergency system without the need for an additional surcharge.

Hawaiian Telcom currently provides the telecommunications network routing portion of the statewide E911 system. Pursuant to HRS Section 269-16.95, Hawaiian Telcom's telecommunications network capital costs and associated operating expenses for providing this service are recovered through a landline telephone surcharge. Non-telecommunication network related expenses such as personnel costs to answer the incoming E911 calls at the County operated Public Safety Answering Points (hereinafter "PSAP") are funded directly by the Counties, and are not subsidized by the landline E911 telephone surcharge.

The telecommunication costs to provide E911 service are considerably greater than the telecommunication costs of a non-emergency call center. The E911 expenses are higher because the system provides Automatic Number Identification (allows operator to call the user if the call is disconnected) and Automatic Location Identification (allows operator to identify the location of the user) to the PSAP.

A non-emergency call center does not need the enhanced services required for 911. Instead, it would only require the ability to have calls routed through the telecommunications network. In addition, a non-emergency call center does not require as much infrastructure expense as the E911 network and equipment since it does not need to be fully redundant from the Central Office to the PSAP locations and monitored on a 24-hour basis. The fact that the cost to provide a non-emergency call center is considerably less than that of an E911 system should negate the need to mandate a new non-emergency call center surcharge.

Hawaiian Telcom understands that the City and County of Honolulu is contemplating a five-point non-emergency reporting system to divert non-emergency

calls from the E911 system. Included with this plan are the following: a non-emergency call center, an expanded web site to include on-line reports, officers at district stations to handle reports, an enhanced 911 page in the telephone directory, and an educational program to inform the public on the proper use of both the E911 and the non-emergency system.

Many of these new services envisioned, while nice to have, should not be underwritten by a new telephone surcharge since these expenses are not directly related to the provision of telecommunication services for a non-emergency call center. Hawaiian Telcom does not believe that the costs associated with these non-telecommunication uses should be passed on to consumers in the form of higher charges on their telephone bill.

Hawaiian Telcom respectfully requests that the bill be amended on page 3, lines 8 to 15, by deleting the language requiring a plan for levying a surcharge on every land line or wireless telephone subscriber to fund the development and operation of the 311 reporting system.

With the deletion of this language, Hawaiian Telcom supports this measure.
Thank you for the opportunity to testify.