

# MAINE STATE LEGISLATURE

The following document is provided by the  
**LAW AND LEGISLATIVE DIGITAL LIBRARY**  
at the Maine State Law and Legislative Reference Library  
<http://legislature.maine.gov/lawlib>



Reproduced from scanned originals with text recognition applied  
(searchable text may contain some errors and/or omissions)



STATE OF MAINE  
**Emergency Services Communication Bureau**  
15 Oak Grove Road, Room B-132  
Vassalboro, Maine 04989-3201



John Elias Baldacci  
Governor

Albert E. Gervenack  
Director

December 15, 2006

Honorable Phillip L. Bartlett II, Senate Chair  
Honorable Lawrence Bliss, House Chair  
Joint Standing Committee on Utilities and Energy  
Augusta, Maine 04333

Re: Progress Report - Efforts by the Emergency Services Communication Bureau to Improve the Handling of E9-1-1 calls by Persons who are Deaf, Hard-of-Hearing or Speech Impaired

Dear Senator Bartlett, Representative Bliss:

The Maine Public Utilities Commission (PUC) and Emergency Services Communication Bureau (ESCB), offer the following, in response to the Committee's request dated April 10, 2006 for a progress report on the efforts by the ESCB to improve the handling of E9-1-1 calls by persons who are deaf, hard-of-hearing or speech impaired. We have also included a status spreadsheet of Public Safety Answering Point (PSAP) compliance with the 16 point ESCB recommended Best Practices for the Federal Americans with Disabilities Act (ADA).

As the Committee is aware, the ESCB issued a number of recommend administrative steps that PSAPs could undertake in order to better ensure that they comply with the requirements of the ADA. Enclosed is a sample of the written communication mailed to all PSAPs suggesting their participation with Teletypewriter (TTY) Best Practices. The letter offers additional resources and the who-and-what of where to find or locate the resource. To assist the PSAP, a checklist form was included in the mailing to provide the PSAPs with an easy method for reporting completion to the ESCB.

The positive results of their efforts to comply with the 16 recommended steps are compiled in the attached spreadsheet summary report. It may be noted, on the spread sheet, that some PSAPs choose not to participate at all or only partially participate in the 16 ESCB Best Practices recommendations. Their decision is based on their recent or future removal as a PSAP and/or the January 1, 2007 requirements to be Emergency Medical Dispatch (EMD) certified. The effort by the approved PSAPs continues, with on-going staff training, periodic TTY test calls and equipment checks. Also noted on the spread sheet for items #11 and #12, the indication that total compliance may not be met in these areas of the state where no client/s can be located or identified by the deaf community, voluntary identification, or TTY directory.

Within the ESCB, the training staff has expanded their basic training curricula to better address TTY functionalities and have added materials and equipment relative to Voice Carrier Over (VCO) and Hearing Carrier Over (HCO) (equipment provided by Maine Center On Deafness) call recognition and response. Additionally, the trainers have added a special tuition-free three hour seminar on advanced TTY/HCO/VCO skill areas. Many PSAP calltakers have already attended this seminar and additional sessions are scheduled each month.

Beyond the efforts by individual PSAPs, the ESCB has undertaken the implementation of the many positive recommendations of the TTY Stakeholder Discussion Group via recent proposed administrative rule amendments. Since the pervious short legislative session a PUC/ESCB rule making process was initiated. The rule amends the section identifying Minimum Public Safety Answering Point Requirements. Specifically, the amended rules will require a PSAP implement a public comment process and a Quality Assurance (QA) program. This Quality Assurance process is likely to be similar to one in a recently adopted rule of the Maine Emergency Medical Services Bureau, relative to EMD QA. The new section 3 identifies reporting and recordkeeping requirements pertaining to public safety dispatcher employees. They are modeled on statutory language from the Maine Criminal Justice Academy, 25 M.R.S.A. § 2803-A-2807, for officers under their training jurisdiction. The new section 3-A contains rules for minimum mandatory staff training requirements, specialized training, and continuing education requirements. These rules are based on: (1) statutory language from the Maine Criminal Justice Academy, 25 M.R.S.A. § 2803-A-2807 for officers under their training standards jurisdictions; (2) information from the recommendations from the TTY Stakeholder Group; (3) ESCB Job Task Analysis project, 9-1-1 Call takers/Dispatchers, Final report, 2006; and (4) Association of Public Safety Communications Officials — Project 33-revised, Minimum Training Standards for Public Safety Telecommunicators.

From the work of the stake holders group, rules were written and in accordance with the ESCB statute requirements, three Public Hearings were held and testimony was taken. The public hearings were held in Bangor, Augusta, and Portland. At each of the hearings, it was gratifying to receive supportive testimony from representatives of the Dept. of Labor, Division on Deafness, the deaf community, deaf advocates, service providers, and PSAP administrators. The final ESCB Administrative Rule and Order on the proposed rule amendments are eminent.

The ESCB would be pleased to offer periodic status updates to the committee and respond to any questions you might have.

Respectfully,

Handwritten signature of Stephan M. Bunker in black ink, with the initials "AG" written below the signature.

Stephan M. Bunker  
9-1-1 Operations Manager

Encl: U & E Letter To PUC, April 10, 2006  
ESCB Letter to all PSAPs, Aug. 31, 2006  
Sample of 16 Point TDD/TTY PSAP Status Report  
Summary PSAP Status Report, Spreadsheet  
122<sup>nd</sup> short session, U & E TTY status package

PHILIP L. BARTLETT II, DISTRICT 6, CHAIR  
 SCOTT W. COWGER, DISTRICT 21  
 CAROL WESTON, DISTRICT 23



ION C. CLARK, SENIOR ANALYST  
 RISTEN GOTTLIEB, COMMITTEE CLERK

LAWRENCE BLISS, SOUTH PORTLAND, CHAIR  
 HERBERT ADAMS, PORTLAND  
 PETER L. RINES, WISCASSET  
 CHRISTOPHER W. BABBIDGE, KENNEBUNK  
 JOHN R. BRAUTIGAM, FALMOUTH  
 KENNETH C. FLETCHER, WINSLOW  
 MAITLAND E. RICHARDSON, SKOWHEGAN  
 PHILIP A. CURTIS, MADISON  
 STACEY ALLEN FITTS, PITTSFIELD  
 EVERETT W. MCLEOD, SR., LEE

STATE OF MAINE

ONE HUNDRED AND TWENTY-SECOND LEGISLATURE

COMMITTEE ON UTILITIES AND ENERGY

April 10, 2006

Kurt Adams, Chair  
 Maine Public Utilities Commission  
 State House Station 18  
 Augusta, ME 04333-0018

Dear Chairman Adams:

As you know, this committee reviewed and discussed the commission's January 17, 2006 report on its stakeholder process relating to the handling of E-9-1-1 calls by persons who are deaf, hard-of-hearing or speech impaired. The committee also reviewed the update provided by Mr. Bunker by letter dated March 2, 2006.

We understand the stakeholder process has been productive and continues. We also understand there are a number of administrative steps the ESCB has taken and will be taking to improve the handling of such calls. The committee understands and expects these the efforts to continue, including ensuring that all PSAP managers and training officers successfully undertake the 16 items listed in the attachment to Mr. Bunker's letter.

The committee wishes to monitor the bureau's progress in addressing issues discussed by the stakeholders. We request that the commission supply a progress report to this committee no later than 15 December 2006.

Thank you for your attention to this matter.

Sincerely,

Philip L. Bartlett II  
 Senate Chair

Lawrence Bliss  
 House Chair

cc: Members, Joint Standing Committee on Utilities and Energy  
 Albert Gervenack, Director, ESCB  
 Jan DeVinney, Director, Division of Deafness, Bureau of Labor

G:\COMMITTEES\UTE\CORRESP\UTE\2006\ltr to ESCB on PSAP and TTY.doc(4/7/2006 2:55:00 PM)



STATE OF MAINE  
**Emergency Services Communication Bureau**  
15 Oak Grove Road, Room B-132  
Vassalboro, Maine 04989-3201



John Elias Baldacci  
Governor

Albert E. Gervenack  
Director

August 31, 2006

*(Example of letter sent to all PSAP administrations)*

XXXX, Director  
Lewiston/Auburn 9-1-1 ECS  
Auburn, Maine 04210

Subject: Handling of E9-1-1 Calls from Deaf, Hard of Hearing or Speech Impaired

Dear Mr. or Mrs. X:

1. Earlier this year the bureau corresponded with all Public Safety Answering Points (PSAPS), which included a copy of the 2005-2006 Maine TYTY Directory and a 16 point directive intended to assist your agency in improving TTY call answering practices (encl. #1).

This directive was in response to recommendations brought forth by a special TTY Stakeholders Discussion Group, as required by Legislative Resolve, Chapter 63, of the 122<sup>nd</sup> Maine Legislature (encl. #2). Also added were numerous steps that the Bureau has identified as "best practices" or policies PSAPS could adopt in efforts to ensure ADA compliance.

In a legislative status report to the *Joint Standing Committee on Utilities and Energy*, this directive and its list of 16 points was included as part of the Bureau's reported attempts to improve PSAP TTY call handling skills. The Committee in turn directed the Public Utilities Commission, thru the Bureau, to report back to them, no later than December 15, 2006, as to the progress of each PSAP in successfully undertaking each of the points listed. (Encl. #3)

In order to comply with this legislative request, the enclosed TTY/TDD Compliance Status Report (encl. #4) is to be used by PSAPS to the report to the Bureau, their completion of each of the 16 steps listed in the directive. As each step is completed, the PSAP simply dates and initials the step and faxes the report to the Bureau. Reports will be compiled so as to maintain a comprehensive status report for submission to the legislative committee and for review by the Stakeholder Discussion Group.

At the end of the list it asks that PSAPS who felt that they were in compliance, to report such to the ESCB. To date no reports of overall compliance have been received, but the bureau hopes that this correspondence and enclosures will change that. Please make a good faith effort to meet the spirit and intent of the legislative committee to improve equal access via TTY for all 9-1-1 callers and by utilizing the Status Report referred to above.

2. As a resource to PSAPS to assist in in-house training of their staff, the Bureau has purchased four copies of the training video entitled TTY Call Recognition and Processing. The tape comes with a CD containing an instructor's guide which can also be used as a handout, along with a student quiz. The tape is a good refresher on TTY skills we address in new 9-1-1 call taker certification training, plus it introduces the viewer to new topics such as VCO & HCO technology, and gives great information concerning deaf culture and TTY usage.

This video is available on loan free, by contacting the Bureau @ 877-8068 to reserve your copy. Your agency is encouraged to offer this video as a formal in-service presentation or assign each call taker to view the tape and take the written quiz. Keep local training records to document the training, and report the training completion to the Bureau as one of your TTY compliance milestones. Completion of this training series may be used for Continuing Education Units (CEUs) for professional licensing and re-certification efforts such as EMD.

3. A reminder that Ruth Mullen, our Verizon technology trainer, and I developed a 3-hour special TTY seminar, entitled TTY Call Recognition and Response and are offering this tuition-free class each month at the academy 9-1-1 training lab. It is an excellent opportunity to refresh old TTY skills on the MAARS-View workstations, plus pick up some important new information such as Hearing-carry-over (HCO and Voice carry-over (VCO) use. Please contact the Bureau or visit the web site for training dates and take advantage of this informative, hands-on course.

4. There are a number of free resources available to assist 9-1-1 centers with policy development, training, community outreach, and ADA compliance efforts with their deaf, hard-of-hearing and speech impaired citizens. Please visit the National Emergency Number Association web site at [www.nena9-1-1.org](http://www.nena9-1-1.org) . On their main page, see the menu "*For PSAP Professionals*", from there select "*Operations Standards*" or "*Operational Information Documents*" and see the following documents, free for downloading and adaptation for your agency;

- NENA E9-1-1 TTY Training Operational Standard Doc. 52-001
- NENA Managers Guide to the ADA Title II: Direct Access Doc. 52-002
- NENA TTY Call Taker Proficiency & Quality Assurance Operational Standard/Model Recommendation Doc. 52-003
- NENA TTY/TDD Comm. SOP Model Recommendation Doc. 56-004
- NENA TTY Phone Pal Program (PPP) Operational Info. Doc. 52-501
- NENA Silent or Hang-up 9-1-1 Calls for Service, An Operations-Focused Study, Operational Info. Doc. 56-501

5. The single most definitive resource on ADA compliance for 9-1-1 centers is the Department of Justice (DOJ) document entitled Americans with Disabilities Act, Access for 9-1-1 and Telephone Emergency Services. This document is contained in the 3-ring binder of student materials that every 9-1-1 call-taker has received during their 2-day certification, and is located under Tab 9. This document is also available by going to the DOJ home page at <http://www.usdoj.gov/crt/ada/911ta.htm> . Every PSAP call-taker is urged to review this document, and then check this step off as part of your 16 point compliance process.

6. Contained in the same 3-ring binder, under Tab 9, is a **TDD/TTY Accessibility Self-assessment Checklist** for Maine PSAPs. Every PSAP administrator is urged to perform this self-assessment as a first step toward addressing areas needing improvement. The more answers you have as “YES”, the more likely your agency your PSAP will responsive to TTY calls. Retain this assessment as documentation of your efforts, and report this as part of your 16 point compliance efforts. Any questions answered as “NO” or you are unsure, please contact this office for assistance.

7. In order to ensure that all critical PSAP TTY equipment is operational, your agency should implement a process to check/test such equipment on a routine basis, and if failures are detected, ensure that repairs are made in a timely fashion. A sample **Equipment Checklist and SOP** is available by request thru this office, compliments of Knox Regional Communications Center, Linwood Lothrop, Director. Once implemented, report this as part of your 16 point compliance efforts.

It is the Bureau’s hope that most, if not all, PSAPs do in fact comply with the requirements of the ADA for 9-1-1 access and it is simply a matter of compiling and documenting such compliance. For those PSAPs who need improvements in some areas, the many resources mentioned in this document will make quick work of what is left to do.

To that end, please make use of the Compliance Status Report and fax your completion of each of the 16 points, as they occur. Knowing that a number of you have long since met many of the 16 points, feel free to credit your agency with the actual historic date you met a given point(s).

Preserve your copy of the status report, and simply re-fax the updated version to my office as another point is completed.

Thank you in advance for your efforts in this regard and please contact my office for assistance with any questions you may have.

Respectfully,

Stephan M. Bunker  
E9-1-1 Operations Manager

Cc: Joint Standing Legislative Committee on Utilities and Energy  
TTY Stakeholder Discussion Group Members  
Commissioners-PUC

Encl. #1 16 Point Directive (1-28-06)  
Encl. #2 Legislative Resolve, Chapter 63  
Encl. #3 Letter to PUC  
Encl. #4 TTY Status Report

# EMERGENCY SERVICES COMMUNICATION BUREAU

## TTY/TDD Compliance with the ADA

### Status Report for PSAPs

(31 August, 2006)

**Directions:** As your PSAP completes one or more of the recommended 16 administrative steps toward ADA compliance, as outlined in the ESCB (1-28-06) memo, fill in the date completed and staff initials on the applicable lines and fax the report to the ESCB at 877-8070 (fax). Retain the master copy and submit updates as additional compliance points are attained. The ESCB will compile an on-going report on behalf of all PSAPs, and report such compliance to the Legislative Joint Standing Committee on Utilities and Energy, no later than 15 December, 2006.

PSAP Agency Name \_\_\_\_\_ PSAP Director/Supervisor Name \_\_\_\_\_

<u>ITEM #.</u>	<u>Recommended Activity</u>	<u>Date Completed</u>	<u>Initials</u>
1.	Discard old TTY Directory, replace w/new, inform staff of arrival, location.....	_____	_____
2.	Conduct in-service refresher training, document training, request training aids...	_____	_____
3.	Direct all staff to review in-house "silent call" policy, update as needed.....	_____	_____
4.	Direct all staff to review TTY features & operations steps on 9-1-1 gear.....	_____	_____
	Direct all staff to review DOJ white paper, ACCESS for 9-1-1, Tab #9.....	_____	_____
6.	Conduct TDD/TTY Accessibility Self-Assessment Audit, Tab #9.....	_____	_____
7.	Post laminated MAARS-View Job Aid-TTY features @ workstations.....	_____	_____
8.	Require call-takers to practice sending & receiving test TTY calls, document.....	_____	_____
9.	Require staff to perform equipment checks, TTY functions, checklist document.....	_____	_____
10.	Managers, use MAGIC software to I.D. TTY calls, challenges to silent calls.....	_____	_____
11.	Conduct TTY "test" calls w/local deaf community citizens, "TTY Pal Program"...	_____	_____
12.	Use TTY Directory, public education mailing to deaf citizens.....	_____	_____
13.	Offer self as public speaker to deaf gatherings, deaf to review PSAP SOPs.....	_____	_____
14.	Provide deaf w/non-emergency TTY number, contact name for questions, concerns.	_____	_____
15.	Request additional copies of TTY Directory, Maine Center on Deafness, 797-7656.	_____	_____
5.	Contact ESCB, Steve Bunker @ 877-8068, SOP's, Training, Compliance issues...	_____	_____



PSAP TTY/TDD Compliance Status Report as of Dec. 15, 2006(9:30AM)																
PSAP Agency	16 Recommended Steps Toward Improved ADA Compliance*															
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
1 Androscoggin County SO	x	x	x	x	x	x	x	x	x	x	x	x	x	x	n/a	x
2 Augusta PD	x	x	x	x	x		x	x	x			x		x	x	x
3 Augusta-DPS	x	x	x	x	x		x	x	x					x	n/a	x
4 Bangor PD	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x
5 Biddeford PD	x	x	x		x		x								x	
6 Brunswick PD	x	x	x	x		x	x	x						x		
7 Cape Elizabeth PD **	x		x	x	x		x	x	x						x	
8 Cumberland County	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x
9 Falmouth PD **																
10 Franklin County SO	x	x	x	x	x	x	x	x	x	x	x				x	x
11 Freeport PD **	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x
12 Gray-DPS	x	x	x	x	x											
13 Hancock County RCC	x	x	x	x		x		x	x							
14 Houlton-DPS	x				x	x	x								n/a	x
15 Kennebec County SO	x		x	x			x	x								
16 Kennebunk PD **	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x
17 Kennebunkport PD **	x	x	x	x	x	x	x		x		unk.	unk.			n/a	x
18 Kittery PD **	x	x	x	x	x	x	x	x	x	x	x			x	x	x
19 Knox RCC	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x
20 Lewiston/Auburn 9-1-1	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x
21 Lincoln County 9-1-1	x	x	x	x	x	x	x	x	x	x				x	x	x
22 Lisbon PD **																
23 Old Orchard Beach PD **	x	x	x	x	x	x	x	x	x							x
24 Orono-DPS	x		x	x	x		x	x			x			x	x	x
25 Oxford County RCC	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x
26 Penobscot RCC	x	x	x	x	x	x	x	x	x	x	x			x		x
27 Piscataquis County SO	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x
28 Portland PD	x	x	x	x	x	x	x	x	x	x	x			x	n/a	x
29 Saco PD **	x	x	x	x												
30 Sagadahoc County	x		x	x	x	x			x	x				x	x	x
31 Sanford PD	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x
32 Scarborough PD	x	x	x	x	x	x	x	x	x	x		x	x	x	x	x
33 Somerset County	x	x	x	x	x	x	x								x	x
34 South Berwick PD **	x						x								x	
35 South Portland PD	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x
36 Waldo County RCC																
37 Washington RCC																
38 Waterville PD	x	x	x	x	x			x	x	x	x	x		x	x	x
39 Wells PD **	x	x	x	x	x	x	x	x	x	x	x	n/a	n/a	x	x	x
40 Westbrook PD	x		x	x	x		x	x	x	x	x		x	x	n/a	x
41 Windham PD **	x				x		x								x	x
42 Yarmouth PD **	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x
43 York County	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x
44 York PD	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x



122<sup>nd</sup> Legislative Short Session

ESCB Status Report To The U & E Committee

Package

## CHAPTER 63

S.P. 594 - L.D. 1612

### **Resolve, To Ensure Proper Handling by the E-9-1-1 System of Calls Made by Persons Who Are Deaf, Hard-of-hearing or Speech-impaired**

**Sec. 1. Development of adequate systems and testing. Resolved:** That the Public Utilities Commission, Emergency Services Communication Bureau shall convene a stakeholders group, including representatives of dispatch centers that handle E-9-1-1 calls and the Maine Center on Deafness, to examine how to ensure that the E-9-1-1 system adequately handles calls made by persons who are deaf, hard-of-hearing or speech-impaired. The stakeholder group shall examine training needs and procedures, system standards and testing procedures as well as any other matters necessary to ensure that the E-9-1-1 system adequately handles calls made by persons who are deaf, hard-of-hearing or speech-impaired; and be it further

**Sec. 2. Report. Resolved:** That the Public Utilities Commission, Emergency Services Communication Bureau shall, no later than January 15, 2006, report to the Joint Standing Committee on Utilities and Energy the results of the stakeholder process established under section 1 and any recommendations for further actions. The report must include legislation necessary to implement recommendations of the bureau; and be it further

**Sec. 3. Authority to report legislation. Resolved:** That the Joint Standing Committee on Utilities and Energy may report out legislation relating to the subject matter of this resolve to the Second Regular Session of the 122nd Legislature.

**Report on E-9-1-1 Calls Made by Persons Who Are  
Deaf, Hard-of-Hearing or Speech-Impaired  
Presented by the Public Utilities Commission,  
Emergency Services Communications Bureau  
January 15, 2006**

**I. BACKGROUND**

P.L. 2005, ch. 63 is a Resolve that requires the Public Utilities Commission, Emergency Services Communications Bureau (ESCB) to convene a stakeholder group to examine how to ensure that the E-9-1-1 system adequately handles calls that are made by persons who are deaf, hard of hearing and speech impaired. The Resolve directs the stakeholder group to examine training needs and procedures, system standards and testing procedures as well as any other matters necessary to ensure that the E-9-1-1 system adequately handles calls made by persons who are deaf, hard of hearing and speech impaired. The Resolve further requires the ESCB to submit a report to the Utilities and Energy Committee that summarizes the results of the stakeholder group process and recommendations for further action including any draft legislation that is necessary to implement the stakeholder group's recommendations.

This report responds to the Resolve.

**II. DISCUSSIONS**

The Resolve directs the ESCB to convene a stakeholder group that includes representatives of dispatch centers who handle E-9-1-1 calls and the Maine Center on Deafness (MCD). On its own initiative, the ESCB expanded the stakeholder group to include representatives from the Maine Department of Labor-Bureau of Rehabilitation Services-Division of Deafness (DoD), because the DoD has a statutory charge to ensure the adequacy of governmental services for such persons. In addition, the Director of DoD is the deaf and hearing impaired representative on the E-9-1-1 Council and therefore has more than a working knowledge of the ESCB and the handling of E-9-1-1 calls from the deaf community. To include E-9-1-1 dispatch center representatives on the stakeholder group, the ESCB invited the leadership of the Maine Chapter of the National Emergency Number Association (Me-NENA), the professional trade association for 9-1-1 emergency communications professionals.

The stakeholder group was charged by the Resolve to examine the following topics:

- Training needs and procedures;
- System standards and testing procedures;
- Any other matters necessary to ensure proper handling of such calls; and
- Any legislation necessary to implement recommendations of the stakeholder group and the ESCB.

To date, the ESCB has convened two stakeholder meetings that were held at the ESCB's office at the Vassalboro-Academy facility. The following people attended one or both of the meetings:

- MCD Director Jonathan Connick and several members of his staff;
- DoD Director Jan DeVinney and a member of her staff;
- ME-NENA President & York County PSAP Director Sandra Simonds and 3-5 additional PSAP managers and supervisors from around the State;
- ESCB Director Albert Gervenack and staff member Stephan Bunker, who acted as meeting facilitator and report author; and
- Two certified American Sign Language (ASL) interpreters, who were necessary for the stakeholder discussion because several participants at the meetings were deaf and/or hearing impaired.

Each of the meetings lasted over two hours. The discussions were in-depth, far-reaching and conducted in a spirit of cooperation and with the desire for mutual understanding among all parties. Minutes of meetings were kept and circulated among the participants. Stakeholder group members corresponded by e-mail between meetings and many resource documents were identified and shared among members. These resource documents addressed issues such as dispatch equipment testing and practice call policies as well as current and new dispatcher training programs.

From the outset of the discussions, it was obvious that the issues surrounding the handling of E-9-1-1 calls from the deaf, hard-of-hearing and speech-impaired are complex and heavily influenced by ever-changing technology and demand continuing attention by all parties. Some of the areas requiring ongoing review include (1) training and education (both dispatchers and the public) and (2) changes and upgrades to technology (used by dispatch centers and by the caller). The group agreed that a forum should be created that would allow for the ongoing exchange of information and consideration of responses to evolving issues and concerns in this area.

It also became clear that this is not an issue unique to Maine, but instead is of national importance, and that it is being debated and researched by many state and federal stakeholder agencies, consumer and advocacy organizations and technology manufacturers. To date, none of these groups and organizations has been able to find a total solution for the issues under consideration.

With these facts in mind, the stakeholder group and the ESCB recommend that the Committee consider this report to be interim in nature and request that the stakeholder group be allowed additional time to continue its discussion of the issues identified in the Resolve. This request for additional study time is based on the following considerations:

- The large number of stakeholder participants and their need for time to adequately express their positions and share information;
- The number and complexity of issues and the time needed to identify potential solutions: and

- The scheduling challenges inherent in obtaining certified ASL interpreters for stakeholder group meetings.

### **III. RECOMMENDATIONS AND PROPOSED NEXT STEPS**

Notwithstanding the constraints listed above, the stakeholders have made significant progress in the examination of the issues identified in the Resolve and have reached concurrence on many important points. The stakeholder group and the ESCB make the following recommendations for future action.

#### **A. Training Needs and Procedures**

The stakeholder group and the ESCB agree that the following actions and next steps should be taken with regard to training needs and procedures:

- The ESCB will begin immediately to examine and expand its current E-9-1-1 call taker certification curriculum to ensure that it includes training in the use and recognition of calls from TTY/TTD, HCO, VCO, Relay Service, and other technology commonly used by the deaf, hard-of-hearing and speech impaired community to report emergencies.
- In future plans for expanded and improved mandatory training of emergency call takers, the ESCB will ensure that such training requirements include staff at all non-PSAP, local dispatch centers who also receive and process calls from the deaf, hard-of-hearing and speech impaired community.
- The ESCB and DoD will review, at least annually, the basic and in-service training curricula to ensure that they are adequate and consistent with recognized standards.
- The ESCB and DoD will communicate regularly about changing technology, new policies and procedures, focusing on the perspectives of both the E-9-1-1 service provider and the consumer. The E9-1-1 Council and DoD Deaf Advisory Council forums are readily available for such exchanges.

#### **B. System Standards and Testing Procedures**

The stakeholder group and the ESCB agree that the following actions and next steps should be taken with regard to system standards and testing procedures:

- The ESCB will ensure that any/all PSAP E-9-1-1 technology that is procured and installed meets all requirements of applicable ADA standards for the reception and process of calls from the deaf, hard-of-hearing and speech impaired community.

- The ESCB, with the assistance of the DoD, will develop a formal process for receiving complaints, questions and expressions of concern from members of the deaf, hard-of-hearing and speech impaired community. This process will identify the manner, points of contact at the PSAP level and above, and necessary information required to respond to the complaint. The bureaus will utilize their respective public education programs to implement the process within the deaf, hard-of-hearing and speech impaired community.
- The ESCB will, through its ongoing scheduled rulemaking process, implement a PSAP requirement that includes, at a minimum, periodic and routine equipment testing of TTY-related functionality, and call taker practice in sending and receiving test calls, both "silent" and unannounced, utilizing the various common adaptive equipment such as TTY, HCO/HCO, CAP-TEL. Each PSAP will maintain records of such equipment tests and practice calls by call taker staff, open to review by the DoD, upon request.
- The ESCB will, through its ongoing scheduled rulemaking process, require that all PSAPs provide for regular, continuing education, at least annually, of all call takers on the subject of call handling from the deaf, hard-of-hearing and speech impaired community.

### **C. Ongoing Stakeholder Involvement**

The stakeholder group and the ESCB agree that the following actions and next steps should be taken with regard to ongoing stakeholder involvement:

- The ESCB, DoD, MCD, and Maine-NENA chapter leadership agree to continue stakeholder meetings. The meetings will be held as often as is necessary, but no less frequently than once a year, to exchange information, ideas and concerns.
- The ESCB will ensure that all stakeholders and their constituents are well informed about the rulemaking process and are afforded ample opportunity to comment on all proposed rules and to monitor their implementation once adopted.

## **IV. IMPLEMENTING LEGISLATION**

The Resolve directs that the report include legislation necessary to implement the recommendations of the ESCB and the stakeholder group. None of the recommendations and proposed next steps identified in this report requires additional legislation. Consequently, the stakeholder group and the ESCB propose no new legislation at this time.





STATE OF MAINE  
**Emergency Services Communication Bureau**  
15 Oak Grove Road, Room B-132  
Vassalboro, Maine 04989-3201



John Elias Baldacci  
Governor

Albert E. Gervenack  
Director

March 2, 2006

Honorable Phillip L. Bartlett II, Senate Chair  
Honorable Lawrence Bliss, House Chair  
Joint Standing Committee on Utilities and Energy  
Augusta, Maine 04333

Re: Update to January 15, 2006 Report on Stakeholders Process Relating to E9-1-1 Calls  
Made by Persons Who are Deaf, Hard-of-Hearing or Speech Impaired.

Dear Senator Bartlett, Representative Bliss:

On behalf of the Public Utilities Commission, Emergency Services Communication Bureau (ESCB), in response to the requirements of the above Resolve, we offer a brief update to the Report issued January 15, 2006.

Since that time the stakeholder group has met an additional time as a whole and have also recently convened a smaller sub-committee to work on issues and ideas relative to possible administrative rules amendments.

Additionally, a letter was received by the ESCB and copied to the U & E Committee Chairs, from Mr. Larry Taub, Chairman of the DoD Advisory Council, dated January 19, 2006. Based on a tone of dissatisfaction, an invitation was extended to Mr. Taub to become a stakeholder participant, which he graciously accepted.

Mr. Taub attended a subsequent Stakeholder group meeting of February 1, 2006, affording me an opportunity to address the issues and concerns he raised in his letter. As this was his first meeting, I outlined the activities by the ESCB, relative to actions, timelines, rulemaking, proposed improvements to training, equipment checks and test/practice TTY calls by PSAPs.

Having offered this information, I specifically asked Mr. Taub if he still desired a written reply to his concerns, which he declined as not being necessary, that he was satisfied with our presentation at that time. The ESCB continues to welcome Mr. Taub's participation, as his busy schedule allows, and we continue to disseminate Stakeholder meeting minutes, reference materials and e-mail exchanges to him, as we do all Stakeholder participants.

In brief, since the writing of the January 15, 2006 Report, the following actions and events have taken place.

- The ESCB has proposed a specific timeline for the adoption of administrative rules amendments, allowing for the required public hearings and comment periods,
- A sub-committee has met and drafted numerous proposed administrative rules for consideration by the Stakeholders, addressing the issues of training, equipment testing, practice/test TTY calls, public comment/complaint programs, quality assurance reviews of emergency calls, to name but a few.
- The ESCB has formally requested Verizon, as Maine's 9-1-1 service provider, to expand and enhance their basic training curriculum on call taker technology to more fully address the use of TTY/VCO/HCO. Staffs from the Maine Center on Deafness have offered to assist the Verizon trainer in connecting equipment and hands-on training in VCO/HCO usage.
- Verizon has also been asked to design and deliver a special continuing education course for current call takers, specifically on refreshing/improving skills on TTY/VCO/HCO call recognition. The ESCB will offer the course over multiple days/weeks to allow easy access to all PSAP call takers.
- The ESCB has issued a directive to all PSAP to commence a 14 step process to improve their compliance with federal ADA guidelines relative to equal access, and to report back to the ESCB when their internal compliance audit is completed.
- Both the ESCB and DoD has commenced a nation-wide search among their peers to identify any industry "best practices" relative to 9-1-1 access via TTY, training curriculums, administrative rules or statutes, and advanced PSAP call taker technology that assists with TTY reception and processing.

It is the expectation of the ESCB that the rules process will precede to a successful conclusion, we remain committed to that end. However in fairness to all Stakeholder members, we do not suggest that in committing to the final Resolve report, that they forfeit their right to seek future legislation as the group understands that consensus by all Stakeholder member groups may not be achieved in the end.

I feel that one of the most significant recommendations of the Stakeholder process to date is the commitment by the ESCB, DoD, MCD and PSAP representatives to continue our meetings, as frequently as necessary to exchange ideas, offer information, and to monitor the process, to ensure equal access to 9-1-1 by all citizens. The next scheduled meet of the full stake holder group is March 8, 2006 at the ESCB office in Vassalboro.

Respectfully,

Stephan M. Bunker  
 ESCB 9-1-1 Operations Manager  
 Facilitator-Resolve Stakeholder Group

**TO: All PSAP Managers & Training Officers (2 pages)**

New 2005-06 TTY Directory & Review of TTY Policies (01-28-06)

Under separate cover, your PSAP will be receiving a copy of the new **2005-06 Maine TTY Directory** as published by the Maine Center on Deafness. Please use this as a resource for your dispatch center.

With the arrival of this document, it is also an opportunity to remind your staff of the critical importance of ensuring 9-1-1 emergency call access via TTY, and other adaptive devices, by the deaf, hard-of-hearing and speech impaired.

Under the statutory and rule-making authority of the ESCB as found in 25 MRSA section 2926, and in our shared efforts to ensure adequate PSAP call-answering standards and procedures, we are asking that you take the following steps with your center staff:

1. Discard the old TTY Directory edition and replace it with this new edition, **ensuring that all staff are aware of its arrival, content and location within the PSAP**
2. Federal DOJ guidelines recommend semi-annual refresher training in order to keep skills sharp. Use this opportunity to review TTY or "silent call" policy & equipment usage as a part in-service training. Document such training & keep records ! Shortly, the ESCB will be providing additional in-service training aids for load to PSAPs and scheduling short refresher & new skill-building seminars. Watch for postings on the ESCB training calendar, or call us !
3. Direct all dispatchers to review your department's in-house policies on detecting, receiving and processing "silent" or TTY calls. A sample "silent call" policy is available from the ESCB on request.
4. Direct all dispatchers to review the TTY features and operating steps that are built into the 9-1-1 MAARS-View call-answering equipment as provide by the state 9-1-1 Bureau,
5. Direct each dispatcher to review the DOJ white paper, entitled *Access for 9-1-1 and Telephone Emergency Services*, included in under TAB 9 of their ESCB training manual,
6. As a PSAP manager or director, conduct a **TDD/TTY Accessibility self-assessment checklist**, also listed under TAB 9, any questions answered "no", contact this office for technical assistance. Keep the completed assessment on file to demonstrate compliance.
7. Consider posting a laminated copy of the MAARS-View training "job-aid" tri-folded card at each workstation, should a call taker need a quick reference on functions and operating features. Contact my office for additional copies.
8. Require each call taker to periodically send & receive a test TTY call, either between co-workers, or with neighboring PSAPs and local dispatch centers. Keep a record of the test TTY calls. A sample test call SOP is available from this office, upon request. Again, practice keeps skills sharp.

9. Require staff to perform an equipment check of their MAARS-View workstations, specifically the TTY functionality. There have been rare, but documented cases where this software feature has failed, unknown to the PSAP, until a TTY call was attempted to be processed, unsuccessfully. Keep documentation of these equipment checks. A sample equipment checklist SOP is available from this office upon request.
10. As a director or manager, use the search features in the MAGIC statistical database software to review the use of TTY by your call takers, identify which call takers are going to "TTY" function and challenging "silent" calls, which are sending & receiving TTY test calls. Keep the completed MAGIC reports to document such activities.
11. Consider conducting a "test" TTY call with a local deaf, hard-of-hearing or speech impaired resident listed in the new TTY Directory, explain the new 9-1-1 TTY services, answer questions about emergency services, enlist them to be a voluntary "test TTY buddy", with prior arrangements ! Contact the ESCB for a sample letter that seeks voluntary participation by the citizen in test calling. The ESCB also has a model SOP on implementing a Community TTY test call program, just ask !
12. Use the TTY Directory to create a mailing list of local deaf citizens, write a public education, public relations letter, explaining the availability & proper use the TTY 9-1-1 services. Ask them to share the information with deaf family & friends. (reminder that the directory only shows those deaf who voluntarily decide to be listed, this is not a complete listing !)
13. Reach out to the deaf citizenry by offering to be a guest speaker at deaf gatherings, and/or offer them an opportunity to visit and tour your dispatch center. See if any would be interested in offering deaf culture training to you dispatchers and area police/fire/emergency medical personnel. Ask them to review your TTY policies and offer suggested improvements. It can be a valuable two-way learning experience.
14. Be sure to give citizens a non-emergency TTY access number and contact person to call for further questions or information.
15. For additional copies of the TTY Directory, please contact the Maine Center on Deafness @ 797-7656.
16. If you have any questions regarding TTY call processing, deaf culture issues, or receive complaints concerning TTY services, please contact my office at 877-8068 or 1-888-448-3803 ext.5.

**When you feel that your PSAP is in compliance with the above, specifically steps to increase in-service refresher training, implementing SOPs on test calls & equipment checks, please report such the ESCB.**

If you need assistance with any of the above, contact us !

Thank you for your efforts to ensure equal access to 9-1-1 by the deaf, Hard of Hearing and Speech Impaired.

# EMERGENCY SERVICES COMMUNICATION BUREAU

## TTY/TDD Compliance with the ADA

### Status Report for PSAPs

(31 August, 2006)

**Directions:** As your PSAP completes one or more of the recommended 16 administrative steps toward ADA compliance, as outlined in the ESCB (1-28-06) memo, fill in the date completed and staff initials on the applicable lines and fax the report to the ESCB at 877-8070(fax). Retain the master copy and submit updates as additional compliance points are attained. The ESCB will compile an on-going report on behalf of all PSAPs, and report such compliance to the Legislative Joint Standing Committee on Utilities and Energy, no later than 15 December, 2006.

PSAP Agency Name \_\_\_\_\_ PSAP Director/Supervisor Name \_\_\_\_\_

<u>ITEM #.</u>	<u>Recommended Activity</u>	<u>Date Completed</u>	<u>Initials</u>
1.	Discard old TTY Directory, replace w/new, inform staff of arrival, location.....	_____	_____
2.	Conduct in-service refresher training, document training, request training aids...	_____	_____
3.	Direct all staff to review in-house "silent call" policy, update as needed.....	_____	_____
4.	Direct all staff to review TTY features & operations steps on 9-1-1 gear.....	_____	_____
.	Direct all staff to review DOJ white paper, ACCESS for 9-1-1, Tab #9.....	_____	_____
6.	Conduct TDD/TTY Accessibility Self-Assessment Audit, Tab #9.....	_____	_____
7.	Post laminated MAARS-View Job Aid-TTY features @ workstations.....	_____	_____
8.	Require call-takers to practice sending & receiving test TTY calls, document.....	_____	_____
9.	Require staff to perform equipment checks, TTY functions, checklist document.....	_____	_____
10.	Managers, use MAGIC software to I.D. TTY calls, challenges to silent calls.....	_____	_____
11.	Conduct TTY "test" calls w/local deaf community citizens, "TTY Pal Program" ...	_____	_____
12.	Use TTY Directory, public education mailing to deaf citizens.....	_____	_____
13.	Offer self as public speaker to deaf gatherings, deaf to review PSAP SOPs.....	_____	_____
14.	Provide deaf w/non-emergency TTY number, contact name for questions, concerns.....	_____	_____
15.	Request additional copies of TTY Directory, Maine Center on Deafness, 797-7656.....	_____	_____
5.	Contact ESCB, Steve Bunker @ 877-8068, SOP's, Training, Compliance issues...	_____	_____