



Four Potential Sustainable Funding Models for NG911

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Dear Reader

This white paper, *Four Potential Sustainable Funding Models for NG911*, outlines the thinking of the National Association of State 911 Administrators (NASNA) on how states might ensure sustainable funding for NG911.

A companion white paper will also be published to help put this paper in context. The second paper will outline the challenges states face in ensuring they are getting all the 911 fee revenue they should from the providers. For example, not all states are able to identify all of the providers that have subscribers or customers in their respective states. Not all states are able to get good data about subscriber counts. Not all states have the authority or capability to audit providers to ensure they have collected and remitted everything they should. Not all states have the authority or capability to audit PSAPs to ensure 911 funds are being used solely for allowable purposes.

The companion paper will set forth best practices that, if implemented, could maximize revenue from the current funding model and thereby increase the viability of that model as a long-term solution for NG911 funding.

NASNA Executive Board

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The Problem

Funding for 911 developed in an era where the only telephone technology available was land line; cell phones and Voice over Internet Protocol (VoIP) did not exist. In that environment, a 911 fee¹ on land line telephone access lines made perfect sense and worked well.

In the 1990's, wireless cellular phones steadily gained popularity in our increasingly mobile society, and across the nation laws began to be changed to add a 911 fee to this type of service. In the 2000's, VoIP became available and grew in popularity as a less costly equivalent to landlines. Again, laws were changed in some states to add the 911 fee to VoIP service. Similar statutory changes have been made with regard to prepaid wireless services. As a result of having technologies that provide greater convenience and mobility, consumers have been abandoning landline telephony in favor of these other modes of communication. The basic 911 funding model – assessing a fee on each end-user device capable of giving access to 911 – has been adjusted to accommodate each new telecommunications service that has entered the market environment, but the basic model has remained the same. The result has been a general decline in revenues for 911.²

There are other aspects of this complex issue that may also have an impact on revenue.

- Assessing 911 fees uniformly and equitably. Some states do not assess the 911 fee on all devices capable of giving access to 911, and other states do not apply the 911 fee rate uniformly across technologies, or even uniformly across the same technology.
- Under collection of funds. Adequate oversight and enforcement mechanisms rarely exist to audit remittances to ensure that all entities that are required to collect and remit do so and do so accurately.
- Use of 911 funds. Adequate oversight and enforcement mechanisms may not be in place to ensure that 911 funds are used for their intended purposes, or that “purchases reflect sound judgment.”³
- Fund sweeps. Wholesale diversions of 911 funds occur in some states and local jurisdictions.⁴

Meanwhile, Next Generation 911 (NG911) represents a move away from legacy landline-based 911 systems to Internet Protocol (IP) based 911 systems. Legacy database and 911 call-routing functions will

¹ The word “fee” is used in this paper to refer to the 911 assessment on telecommunications subscribers or carriers. State statutes may use that term, or may use other terms such as “surcharge” or “tax.”

² Based on data reported to the FCC in compliance with the NET 911 Act, 16 of the reporting states' data showed less revenue in 2012 than in 2013. Several states reported that they do not have authority or a mechanism to collect fee revenue information from local governments. Some states have authority only for revenue from wireless fees and not local landline fees.

³ 911 Industry Alliance, *Health of the U.S. 911 System*, 2008.

⁴ See, for example, the FCC's *Sixth Annual Report to Congress on State Collection and Distribution of 911 and Enhanced 911 Fees and Charges for the Period January 1, 2013 to December 31, 2013*, dated 31 December 2014 <http://transition.fcc.gov/pshs/911/Net%20911/NET911_Act_6thReport_to_Congress_123014.pdf> (last accessed 3/10/2015)

be replaced with Geographic Information System (GIS) based database and call-routing functions. GIS data must be developed and must be of very high quality. The transition involves a period in which both the legacy 911 system and the NG911 system operate in parallel before the legacy system is ultimately decommissioned. Along with this transition, the public switched telephone network itself is in the process of being replaced with IP networks.

The deployment of Next Generation 911 will require additional financial resources, more than amounts being raised by most states (and local governments) today.

For all these reasons, funding for 911 needs to be revisited.

Methodology

NASNA reviewed each of the funding models described in detail in the National Emergency Number Association Next Generation Partner Program's 2007 publication, *Funding 9-1-1 Into the Next Generation: An Overview of NG9-1-1 Funding Model Options for Consideration* and the National 911 Program's 2013 report *Blue Ribbon Panel on 911 Funding*. Nineteen unique models were identified.

NASNA discussed the 19 models and identified four that, in their collective experience, had potential for providing stable funding for 911 into the future.

The first draft of the paper was vetted with industry and government stakeholders. Feedback was addressed, and where appropriate, incorporated into the final paper.

NASNA-Recommended Funding Models

NASNA reviewed the nineteen unique funding model options that have been put forth for discussion nationally and identified four that seem to offer the most potential:

- Current funding model with the addition of prepaid and expanded to assess the fee on Internet access, with all devices supporting the system uniformly
- Sales tax
- Insurance
- State USF

Current Model – 911 Fee with the Addition of Prepaid Wireless

Assessing fixed monthly fees on voice calling services (wireline, wireless and VoIP) is the current 911 funding model.

NASNA members are in agreement that the current model will continue to exist in many states as a primary funding source or as part of a funding mix for the foreseeable future. States must do everything possible to strengthen the current model and make it the best it can be. The next few paragraphs outline what should be done.

- Any device that can access 911 should have the fee assessed on it, including multi-line telephone systems (MLTS)
- The 911 fee should be applied to all technologies capable of giving access to 911
- The 911 fee should be applied equitably across all technologies capable of giving access to 911
- The 911 fee on prepaid wireless should likewise be equitable
- Adequate oversight and enforcement mechanisms should be in place to ensure accurate collection and remittance
- Statutory provisions should be put in place to prevent fund “raiding”

A number of states still do not assess 911 fees on prepaid wireless services.⁵ Those that do generally use one of two approaches: a “menu model” in which the providers have options for determining how to collect, or a “point of sale” model.

The point of sale model varies from state to state: some assess a flat fee per sale transaction at the level of the states’ monthly fee on postpaid devices; others assess a flat fee lower than the monthly postpaid fee; others set the point of sale 911 fee as a percentage of the price of the airtime minutes purchased.

There is evidence that prepaid wireless collection methods generate significantly less revenue on a per device basis when compared to revenues generated from a postpaid device⁶.

Every state that has adopted ‘point of sale’ has established a flat fee or a percentage that is too low, resulting in prepaid devices (users) paying less to support 911 services than postpaid devices (users) on a per device basis.

NASNA believes all wireless devices should support the system at the same rate without any distinction based on whether the phone is using postpaid minutes, prepaid minutes or free minutes⁷.

A related issue is the matter MLTS. Some states still lack provision for assessing 911 fees on these types of phone systems, which means that a significant category of users are not contributing to the support of the 911 system.

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⁵ For example, Alaska, Delaware, Missouri, Montana, Nebraska, Nevada, New Mexico, and others.

⁶ From an unpublished paper entitled, *Prepaid: Still ‘Shortchanging’ 911*, researched and written by the Kentucky State 911 Administrator.

⁷ Some states are asking whether cell phones and minutes provided free to persons eligible under the Lifeline program should be subject to a state’s 911 fee. For industry efforts to prevent states from collecting 911 fees on the Lifeline phones see: TracFone Wireless Inc. Petition for Declaratory Ruling –FCC Docket No. 11-42.

Pros	Cons
<p>This model is almost universally adopted, acceptable to policy makers, and easily understood.</p>	<p>It tends to be a reactive model, requiring funding statutes to be updated to cover new services capable of giving the user access to 911. This negative can be mitigated by adopting statutory language that broadly covers any services capable of providing access to 911, but strong oversight is needed for compliance enforcement.</p>
	<p>The fee rate is not always applied equally to all services.</p>
	<p>Some states do not assess a 911 fee on prepaid wireless services at all. In states that do require prepaid wireless to contribute to the 911 fund, the collection method results in a disparity between the revenues generated on a per phone basis between prepaid and postpaid devices with prepaid generating significantly less by comparison.</p>
	<p>Without modification to capture Internet capable access points, this model will become obsolete.</p>

Current Model Expanded to Assess the Fee on Internet Access

NASNA identified a potential way to modify the current model in a way that would also make use of existing billing mechanisms: Broaden the basic concepts of the current model by assessing the 911 fee as a percentage of the base service charge for telephony, data, broadband, etc. The charges would reflect actual usage (i.e., more connections require more megabytes, which cost more money), and allow for auditing of receipts (reviewing carrier financial statements to track revenue by service [e.g., broadband]). We identified three considerations with this approach:

- The fees collected would vary and be driven by the base charges imposed by the carriers, which could easily be driven downward by economic competition
- The solution to downward-trending revenues would be to increase the percentage assessed, although it might not be timely if it required legislative approval
- Federal law, the Internet Tax Freedom Act⁸, prohibits taxing Internet access. This could be a potential roadblock.

Sales tax

All but five states⁹ have some form of general sales tax that is collected at the point of sale and remitted to the government.

States with no sales tax could attempt to implement one, perhaps exclusively for 911, or simply use another option. These states could, for example, implement something roughly analogous, such as a gas

⁸ Pending Federal legislation, the Internet Tax Freedom Forever Act (ITFFA), would make the ITFA permanent.

⁹ Alaska, Delaware, Montana, New Hampshire and Oregon.

tax, rooms and meals tax, utility tax, etc. The state lottery could be used as a source of revenue for 911. Any of this would likely be politically contentious.

Pros	Cons
Everybody would contribute.	If the larger economy experiences a downturn, sales tax revenues fall. ¹⁰
The tax could start at a higher rate to build a capital fund for NG911 infrastructure expenses and then be adjusted downward for ongoing operational sustainment.	Depending on how implemented, 911 interests may have to constantly fight for its share of sales tax revenues in the state budget process -- would be more susceptible to state budget cuts.
It could eliminate existing fees.	This model does not address the five states without sales taxes.
The model is technology neutral.	Timeframe to “pass”/implement legislation/public vote would be lengthy.
There has been positive support from the telecommunications industry for this approach.	If not protected, the sales tax fund could be diverted.
	If the state considers fees to be taxes, it could be considered "double taxation" if the sales were put in place while fees were still in effect. This could require a hard cut-off date for the fee. If otherwise, the fee and sales tax could operate simultaneously.

There are most certainly considerations, such as:

- The need to determine the sales tax percentage for 911
- The need to define what would be allowable expenditures of the tax
- The need to determine the distribution of the funds to local 911 systems
- The need to institute an annual process to review the collection and distribution method
- The need to protect the funds from being diverted

Nevertheless, NASNA believes that a sales tax model should be considered as a potential method for collecting contributions from all beneficiaries of the 911 system.

Insurance

This model, as presented in the *Blue Ribbon Panel on 911 Funding* report, would attach a fee to health insurance plans.

NASNA does not think that a 911 fee on health insurance is feasible in the context of the Affordable Care Act, but prefers state-centric insurances. There is a broad spectrum of state-based insurance types that

¹⁰ This could be mitigated somewhat by implementing a gross receipts tax instead of a retail sales tax. A gross receipts tax might be harder to pass than a sales tax if the state does not already have gross receipts taxes.

have a nexus with public safety, e.g., home, automobile, equipment, general liability, real and personal property. Due to the connection between such insurance vehicles and public safety, NASNA views it as logical to at least explore the possibility of funding 911 using this mechanism.

Pros	Cons
Non-residents would pay indirectly.	The model is focused on local property owners and might not capture out-of-state visitors.
The model is state-centric rather than federal-centric.	States would have to create distribution mechanisms (could be a pro because locals would receive funding and lower income areas would also receive funding).
It is tied to property and/or safety.	Other non-911 state agencies, such as the insurance commission, would likely get involved.
It could improve fire ratings.	It would bring other private interests into the performance of 911 systems.
It is adjustable.	There would likely be resistance from the insurance industry.
Performance metrics could more easily be tied to funding.	It creates a level of bureaucracy for collection and administration that probably doesn't currently exist.
	There may be other state-centric (not just public safety) services that would want "a piece of the action" as well.

There are considerations:

- The tax rate would need to be defined
- The rate would need to be adjustable to accommodate periods of high capital costs and lower ongoing operational costs
- There would need to be strong protections for the fund
- Governance and oversight would need to be in place
- There would need to be advance assessment of revenue potential from this model
- Allowable uses would need to be defined, and the insurance industry would likely want to have a say
- Competing public safety interests would want to expand the scope of use

State Universal Service Fund (USF)

Vermont is the only state to fund 911 through a state Universal Service Fund (USF). It is a subscriber-based fee on gross receipts of wireline and wireless retail telecommunications service provided to a Vermont address, excluding prepaid. All telecommunications providers must bill their customers for the USF charge and remit the funds collected to the State USF fund. The statute caps the fee at 2 percent. Statute just defines who has to pay and the purpose of the revenue, but doesn't define distribution. USF revenues are allocated based on the legislatively approved budgets for the funded programs: Vermont

Telecommunications Relay Service, Vermont Telecommunications Equipment Distribution Program, Vermont Life Line Program, E911, and the High-Cost Fund.

Pros	Cons
USFs are particularly suited to states with a unified [centralized] oversight and funding system for 911.	States that lack centralized oversight and funding would need to radically alter the way they do business to accommodate this model.
Multiple organizations could benefit from one fund if it were construed as a fee for a broad emergency service/public health fund.	Competition for funding from multiple organizations would be intense and the funds would be a target.
There would be no restriction on collection method (sales tax, fee, combined methods, etc.).	Equal representation
It would provide more support for emergency services at the local level.	There would be a loss of local control over funding in states where 911 funding is purely local.
	Distribution could be problematic.
	States that do not have a state USF would need to establish a collection and remittance infrastructure. Proposal may be opposed by providers of prepaid service because they could not pass the fee on to (collect from) the end user.

As with the other models, there are certain considerations:

- There is the potential for double taxation in states that currently have dedicated 911 resources unless it was clearly articulated what the state USF fund would provide
- There would need to be advance assessment of revenue potential
- There would need to be strong protections for the fund
- Allowable uses would need to be defined

There is no question that this funding option has been highly successful in the State of Vermont and could be equally successful elsewhere. An added benefit is that accountability is built into its distribution structure.

Rejected Funding Models

The other 15 funding model options were rejected for a number of reasons. What follows is a brief overview by way of explanation.

Property-based taxes: fees may not be sufficient to meet the initial investment requirements of NG911 and may be subject to legal action, e.g., the lawsuits in Kentucky.¹¹

Fee for service: The model has never been tested for 911, and developing a billing infrastructure would be daunting.

Sumptuary tax: This type of tax can result in fierce competition among strongly entrenched groups and can have significant political challenges. If the tax results in a decrease in “undesirable” activities, the result would likely be a decline in revenue.

Tolls: Toll revenue alone is typically insufficient to cover the operations and maintenance requirements of an asset. There is a limit at which a toll can be set before users will seek alternatives to the toll-bearing asset, causing its revenue potential to decline.

Auctions: By their nature, auction funds do not provide a consistent funding stream for ongoing maintenance and operations.

Special event permitting fees: Such fees may create an economic disincentive for organizers to host an event in areas where such a fee is imposed, so the source may not generate the level of revenue expected or needed.

User/incident fees: Funding 911 in this way would create a disincentive for people to call 911 in an emergency if a significant charge would come with making the call. Implementation and customer billing would be difficult. It would be unlikely to generate adequate revenue for ongoing maintenance and operations.

Federal and state grants: NASNA encourages State and Federal support for 911 through grants, but since grants are usually awarded on a one-time basis and are not generally allowable for operational costs, they are not intended or expected to provide a steady stream of funding. This should not be interpreted as NASNA saying that it does not approve of grants as a funding method for the implementation of new technologies, such as NG9-1-1, only that grants must be coupled with other, more long-term funding solutions.

National infrastructure reinvestment bank: All attempts to pass federal legislation to create such an institution have failed. Where this type of financing has been used at the state level, it was not useful for funding ongoing operations and maintenance costs.

Public-private partnerships: Public scrutiny is high and stakeholder management is challenging. The public agency loses flexibility in managing the asset. There is a high transaction risk related to complex negotiations and contractual agreements. This mechanism could potentially reduce the cost of 911 services, but it is not a mechanism that generates revenue for ongoing operations and maintenance.

¹¹ One lawsuit involves an effort by the City of Lancaster, Kentucky, to assess a 911 fee in addition to its landline fee on water meters rather than on subscribers of telecommunications services; another involves Campbell County, Kentucky’s effort to abolish its landline telecommunications subscriber-based fee and replace it with a special property tax fee for 911. These efforts are not state models but are initiatives by local government made to compensate for the decrease on local 911 revenues from local landline fees.

Hosted solutions: This is a mechanism that may reduce the cost of 911 services, but it is not a mechanism that generates revenue for ongoing operations and maintenance.

Fee on access infrastructure provider: This model is fundamentally new and untried.

Universal Federal communications fee: State and local government and individual PSAPs may be resistant to the Federal government being the entity to collect and distribute the funds. Safeguards to ensure current funding levels, at a minimum, would need to be guaranteed. Congress would be reluctant to enact a new Federal communications tax and to give the Federal government authority over a function that has traditionally been the responsibility of state and local government.

General fund taxes: 911 is traditionally underfunded for a variety of reasons, often political. There is a legitimate concern that 911 service would not receive a fair share of funding if there are not specific, dedicated funding sources for it.

Vetting the White Paper

NASNA desired to have several key national and federal stakeholders review a draft of this white paper and have an opportunity to comment. This section summarizes the input we received and our response to it.

- The funding mechanism should be a technology-neutral, uniform model that all service providers would utilize, and which could involve extending the current fixed monthly fees on voice calling services to Internet Service Providers. A general revenue-based funding mechanism should be considered as an alternative to a service provider-focused model. NASNA's response: Both of these suggestions are consistent with this paper's recommendations.
- Imposing the 911 fee on Internet access points might violate the Internet Tax Freedom Act (ITFA).¹² Even if such a fee were permissible, there should be guarantees to ensure the fee is used only for 911 purposes. This approach would continue to require wireless carriers to be tax collectors for the state and require them to police the state to ensure the funds are used for the appropriate purpose. A class action lawsuit could be brought if a state misappropriated the funds. NASNA's response: A legal opinion should be sought by any state considering this funding option. The remainder of the stakeholder's comments reflected considerations already raised by NASNA in this white paper.
- The current model is not sustainable in the long term, even with the expansion or tweaks recommended. It risks assessing fees on services that are not capable of, or designed for, accessing 911 (e.g., stand-alone Internet service), or that generally will not be used to access 911 even if there is the capability. It may potentially assess duplicative charges on some subscribers and unfairly burden businesses with significant Internet connectivity. It would not be equitable to assess the fee as a percentage of revenue, because those with higher usage would pay more than those with lower usage. NASNA's response: It may in fact be true that the current per-device fee model is not sustainable indefinitely and will need to be replaced. Until and unless a viable

¹² The ITFA established a moratorium on taxing Internet access and Internet sales, but is set to expire in December 2014. Legislation has been introduced in both houses of Congress that would extend the moratorium permanently.

alternative is identified, however, it is imperative that per-device fees are assessed, fairly, equitably, and universally. Since even the other models recommended in this paper would take an extended time to implement, the suggestions made in this white paper concerning the current funding model are intended to extend the usefulness of the current model.

Sales tax: This model significantly mitigates the problems of the current model by not linking a 911 fee to evolving telecom services. It also would provide significant 911 funding with a relatively modest percentage increase on sales tax. Also, with many other public safety services being directly or implicitly linked to 911, such as public safety broadband, moving to a model that is aligned more with general revenues would provide greater equity. Finally, some jurisdictions already fund 911 using a sales tax. NASNA's response: These comments align with the information presented in this white paper.

USF: This approach is closely related to the current fee model and may not be sustainable for the same reasons provided above. The commenter pointed out that the one state that funds 911 in this manner (Vermont) published a report that concluded that Vermont would be best served in the long term by creating a new type of funding model to support 911 services in the state. NASNA's response: We acknowledge the similarity in the two approaches in terms of the services that pay into the USF fund and note that this white paper outlines the challenges.

Insurance: This approach was not recommended by this stakeholder because of the process and acceptance difficulties associated with implementation and collection. NASNA's response: We have acknowledged there would be challenges associated with implementing such an approach to 911 funding, but challenges notwithstanding, we stand by our recommendation that an insurance model is worth further study and consideration.

- One stakeholder suggested that it would be useful to the reader to understand NASNA's rationale for rejecting certain funding model options. NASNA's response: We agree and added a brief explanation in this document. This stakeholder also asked whether the issue of preventing fund diversion discussed, and if so, if any different/new ideas were exchanged for how that might be accomplished. NASNA's response: This issue was discussed for every potential funding model option, including those that were rejected. Fund diversion remains an ever-present threat to our nation's 911 system and is a serious concern to members of this Association. It is, however, beyond the scope of this paper to propose or discuss specific mitigation or prevention strategies beyond the need for statutory prohibitions. This commenter asked if NASNA had any next steps to propose for the four ideas chosen (i.e., implementation tool kits) and what would be the next steps for a state that was interested in pursuing one of these ideas. NASNA's response: Possible next steps are discussed in the concluding section of this document.
- One stakeholder asked why revenues are decreasing rather than increasing since the number of devices that are capable of accessing 911 are increasing. This stakeholder also raised the matter of federal preemption, which could be a problem – as it was initially with VoIP – as new 911 accessible services come into the market. NASNA's response: Where a jurisdiction's funding for 911 comes primarily or exclusively from landlines, less revenue is being generated. Fees for 911 are not always uniformly applied to all technologies. Prepaid wireless is frequently subject to an entirely different 911 fee structure than other telephony services. Some providers may not be remitting, or may not be remitting accurately. Not all states have the authority to audit the

providers' remissions. Regardless of the reasons, the overall trend is one of decline, although the rate of decline differs from state to state.

- Most states only fund the first half of the emergency call (from the citizen to the PSAP), but fail to fund the call from the dispatch center to the first responder in the field. States should utilize a common funding source that provides funding for the entirety of the emergency call. It is important to ensure that 911 funds are raid proof. NASNA's response: the way 911 has historically been funded has to do with the fact that it began as a telephone service. ILECs have not supported expansion of the 911 fees on their subscribers to include radio dispatching, because radio dispatching is not a telephone company or telephony service in the way that 911 is. We agree that both aspects of responding to an emergency call need to be adequately funded, but there is no consensus among our membership for the idea that there should be a single funding source.
- GIS is essential to NG911, and the paper needs to call out the fact that developing the necessary GIS databases is thereby a proper use of 911 funds. NASNA's response: We agree and have included some language to that effect.

NASNA's Position

The 911 funding model based on fees on wired and wireless telecommunications services must be adjusted to remain a reliable source of sustainable funding, although the rate of decline and the impact on 911 operations varies from state to state. As a result, changes to 911 funding mechanisms will occur at different times in different states. States could adopt one of the NASNA-recommended models or a combination of them.

A Single, Nationwide Funding Model Will Not Work

NASNA members are in agreement that no single solution will work for all states¹³ – there is simply too much diversity in the statutory and regulatory frameworks within which the state 911 programs operate and in the degree to which adequate funding for 911 is a problem. For example, some states define eligible uses of 911 funds broadly and others narrowly, which may have an impact on how far available funds will stretch. Some states (and counties) are able to fund 911 completely through their 911 fee and others are not, which means there will be variability in the degree to which states feel the need to make a change.

Defining 911 Service

NASNA debated the pro and cons of attempting to achieve a national consensus definition of what 911 service is, but ultimately reached the conclusion that funding for 911 has to be independent of any definitional considerations. What we mean by this has to do with the previous point about how states define eligible uses of 911 funds – whether broadly or narrowly. Although this clearly has an impact on available funding, NASNA's position is that variability exists among the states because each state's needs, circumstances and policies are different. This variability is so much a part of our historic fabric as a nation that it is not going to change. We must work with it. That said, allowable uses of 911 funds must

¹³ The term "state" is used in this paper to generically refer to the 50 United States, the District of Columbia and the Territories.

include everything necessary to prepare for a successful transition to NG911, including development of the necessary GIS data and infrastructure.

Everyone Should Help Pay for 911

NASNA believes that everyone who uses the 911 system should help to pay for that system. In many parts of the country with transient or seasonal populations, the people that use the local 911 system pay 911 fees in another region altogether; e.g., students, tourists, commuters. The ideal funding model would broadly capture everyone who uses or benefits from the system whether they live in the jurisdiction or are just passing through or visiting. Providers should help pay for the system, as well.

Fund Diversions

Much has been said and written about the importance of making 911 funds “raid proof.”¹⁴ NASNA agrees that states should make every effort to enact laws to prevent the diversion of funds to non-911 purposes. Nevertheless, the reality is that state legislatures can enact such legislation and a future legislature can take it away in an effort to address a larger economic crisis. Even where such provisions are in place, those responsible for the oversight of 911 funds need to maintain vigilance and be ready to advocate for the inviolability of the funds.

Timeframe for Adopting a New 911 Funding Model

Given the pace of NG911 deployments and the increase in funding sustainability issues, NASNA takes the position that the timeframe for replacing or augmenting the current funding mechanism is the next two to five years. This range reflects the fact that some states may need to address this sooner than others. As previously noted, some states may not feel the need to change and will continue to rely on the current 911 funding model for years to come.

Conclusion

Of all the 911 funding model options that have been placed on the national table for discussion, NASNA believes the four that are recommended in this white paper, singly or in combination, have the strongest likelihood of meeting the 911 funding need into the future.

There is much more work to be done to prove out these recommendations for their applicability in a specific State’s unique environment. Thus, any state considering one or more of these options would do well to convene its stakeholders and work through how it could be made to work in that state. These exercises should be documented and compiled into a body of case studies. This compilation could, in turn, form the basis for the development of an implementation tool kit.

We recognize that we have only scratched the surface of a hugely complex issue. This white paper contains, at a high level, the perspective of the entities that are responsible for implementing and living with 911 funding mechanisms in their respective states. As such, we have a unique perspective. We thank

¹⁴ See, for example, National Emergency Number Association Next Generation Partner Program *Funding 9-1-1 Into the Next Generation: An Overview of NG9-1-1 Funding Model Options for Consideration*, 2007; 911 Industry Alliance (now iCERT) *The Health of the US 9-1-1 System*, 2008; FCC Communications Security, Reliability and Interoperability Council *Working Group 4b Transition to Next Generation 9-1-1 Final Report*, 2011; CTIA blog post at <http://blog.ctia.org/2014/04/16/state-911-raiding/>

our diverse stakeholders for their willingness to share their thinking with us; it enriched our process tremendously.

About NASNA

NASNA represents state 911 programs in the field of emergency communications. Incorporated as an Oregon non-profit in 1994 and 501(c) (3) non-profit in 2001, NASNA is the voice of the States on public policy issues impacting 911. NASNA members believe that state 911 leaders' expertise can assist industry associations, public policymakers, the private sector, and emergency communications professionals at all levels of government as they address complex issues surrounding the evolution of emergency communications.

NASNA's mission is to promote information sharing among those states with programs dedicated to implementing 911 emergency telephone systems, assist other states with resolving issues necessary to accomplish statewide implementation and maintenance, encourage the establishment of a coordination person within each state or province, identify and recommend minimum standards for 911 emergency telephone systems, identify and recommend appropriate legislation or rules concerning the administration of statewide 911 telephone system programs and serve as a knowledge resource for the membership of the Association.