

**THE STATE 9-1-1 COMMITTEE'S JANUARY 15, 2010, RESPONSE
COMMENTS TO STAFF'S SECOND INFORMAL REQUEST FOR COMMENTS ON THE
PROPOSED RULES FOR MINIMUM 911 TRAINING STANDARDS**

I. INTRODUCTION AND BACKGROUND

On June 23, 2009, the State 9-1-1 Committee voted to make recommendations under MCL 484.1413(1)(b) and (2) in regard to training standards for Michigan 9-1-1 telecommunicators. On July 1, 2009, the State 9-1-1 Office forwarded to the Commission a recommended set of guidelines for rulemaking. On August 31, 2009, a proposed draft in rulemaking form was forwarded to members of the State 9-1-1 Committee and other interested parties by Commission staff. On September 23, 2009, the State 9-1-1 Committee (SNC) entered informal comments on the proposed document. Further review and clarification of the formal and informal rulemaking process in regard to training standards yielded a revised proposed training standards document for reply comments due by November 2, 2009. On October 26, 2009, the SNC approved informal reply comments and submitted them to Commission staff on October 28, 2009.

II. DISCUSSION

On December 11, 2009, a revised copy of a second informal draft (Draft [2]) was issued by Commission staff and sent to interested parties. It appears that the comments incorporated into the Commission staff's Draft (2) are based on the Commission staff Draft (1) and that document, which does not fully reflect the original proposed recommendations of the State 9-1-1 Committee (see SNC informal comments from September 23, 2009, and October 28, 2009). Nor does the Draft (2) indicate the broad support that the SNC's original proposal received from various 9-1-1 support organizations (Michigan Communications Directors Association, the Michigan Chapter of the National Emergency Number Association, the Michigan Chapter of Association of Public-Safety Communications Officials) and a number of 9-1-1 dispatch centers throughout the state.

III. CONCLUSION

It does not appear in Draft (2) that the SNC was given full recognition of its original recommendation on minimum 9-1-1 training standards and the subsequent comments previously entered by the SNC in this process were not fully addressed in Draft (2). However, pending a review of the comments submitted by other interested parties in this phase of the rule making process, as well as an opportunity for further collaborative work with the parties involved, the SNC will reserve its forthcoming informal comments for the upcoming reply comment period of this process.

Respectfully submitted,



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Dated: January 15, 2010