

**THE STATE 9-1-1 COMMITTEE'S OCTOBER 28, 2009 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 in the proposed revised document attached as Exhibit 1. The discussion that follows briefly explains the changes proposed.

**II. DISCUSSION**

**PART 1 – GENERAL PROVISIONS**

R 484.XXXX Applicability. Rule 1 -

The recommendation provides further clarification of the functions and responsibilities of the Office of the State 9-1-1 Coordinator and the SNC under the proposed rulemaking.

R 484.XXXX Definitions. Rule 2.

Removes several definitions not used in the proposed rules, including, but not limited to; "communications service," "commission," "committee," "master street address guide," and "primary safety answering point." Modifications were made to clarify and include other definitions used in the proposed rules, including, but not limited to; "internal training," "leave of absence," and "telecommunicator."

**PART 3 – APPROVAL OF COURSES**

R 484.XXXX Rule X – Approval of Courses by the Committee

The SNC recommendation removes this section of the MPSC's staff's proposed document as it is

addressed in the recommendations contained in PART 1 – GENERAL PROVISIONS.

#### PART 4 – TRAINING FUND DISTRIBUTION

R 484.XXXX Rule X. - Distribution based on Reimbursement

The SNC recommendation removes this part of the MPSC's staff's proposed document as it is addressed in the recommendations contained in PART 1 – GENERAL PROVISIONS.

#### PART 5 – TRAINING REQUIREMENTS

R 484.XXXX Rule X. Minimum Telecommunicator Training Requirements

The SNC's recommendation includes further clarification on section 3 in regard to Continuing Education.

#### PART 6 – ADMINISTRATIVE PROCESS

R 484.XXXX Rule 7. The State 9-1-1 Office shall complete the following processes:

The SNC recommendation removes this part of the MPSC's staff's proposed document as it is addressed in the recommendations contained in PART 1 – GENERAL PROVISIONS.

#### PART 7 – WAIVERS

Rule 484.XXXX Waivers

This part is left blank on both the MPSC staff's original proposal and SNC's recommendation.

#### PART 8 – EXCEPTIONS

Rule 484.XXXX

The SNC recommendation adds a provision for exigent circumstances in which circumstances beyond a PSAP's control may arise and reasonable resources may be used to temporarily accommodate immediate staffing needs at that PSAP.

#### ADDITIONAL COMMENTS

There was no PART 2 in the MPSC staff's August 31, 2009 proposed document. In order to preserve the original MPSC staff's proposed draft, the original proposed draft's numbering for PARTS 1- 7 were used.

### **III. CONCLUSION**

Attached as Exhibit 1 is the revised document in the track changes format required by the Commission's staff. We, the State 9-1-1 Committee, are recommending that this document be utilized as

the proposed rule making moves forward. We believe the collaboratively revised document will support an accountable, efficient, and cost-effective system for course approval and fund distribution, as well as facilitate a minimum training level for all 9-1-1 telecommunicators in Michigan.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Dale Gribler".

Dale Gribler, Chair  
Michigan State 9-1-1 Committee  
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Dated: October 28, 2009