SECRETARY'S RECORD, NEBRASKA PUBLIC SERVICE COMMISSION

BEFORE THE NEBRASKA PUBLIC SERVICE COMMISSION

In the Matter of the Commission,)	Application No. 911-061/
on its own motion, seeking to)	PI-192
investigate and review funding,)	
standards and policies relating)	
to Geographic Information),	FINAL REPORT AND ACTION
Systems data necessary for the)	
provision of Next Generation 911)	
service.)	September 12, 2017

BY THE COMMISSION:

On March 21, 2017, the Nebraska Public Service Commission opened the above-captioned docket, on its own motion, for the purpose of investigating and reviewing various issues, including funding, standards and policies, relating to the use of Geographic Information Systems (GIS) Data in connection with the provision of Next-Generation 911 (NG9-1-1) service.

Data has been collected through a series of questions posed to interested parties regarding Commission funding of GIS services and the standards to be applied to such services. A copy of the questions is attached hereto as Appendix A.

Written comments of interested parties were requested on or before April 24, 2017, pursuant to Hearing Officer Order. In response, public comments were submitted in writing by, or on behalf of AT&T Corporation; Airbus DS Communications, Inc. ("Airbus"); City of Lincoln/Lancaster County; Digital Data Technologies, Inc.; GeoComm; Douglas County; N.E. Colorado Cellular, Inc. d/b/a Viaero Wireless ("Viaero"); R&S Digital Services, Inc. ("R&S Digital"); Washington County Sheriff; Charter Fiberlink-Nebraska, LLC and Time Warner Cable Information Services (Nebraska), LLC. In addition, there were written comments provided to the Commission on a confidential basis. Where appropriate the results of public and confidential written comments will be aggregated in the discussion below.

On May 1, 2017, the Commission held a workshop to further explore the issues presented in the docket and the comments filed. Interested persons were able to attend the workshop in

¹ In the Matter of the Commission, on its own motion, seeking to investigate and review funding, standards and policies relating to Geographic Information Systems data necessary for the provision of Next Generation 911 service, Application No. 911-061/PI-192, ORDER OPENING DOCKET, SEEKING COMMENT AND SCHEDULING WORKSHOP (March 21, 2017).

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person or participate via telephone bridge. The persons attended in person included: Jeff Timm, Nebraska Office of Chief Information Officer GIS; Joseph Heiecke, GIS Workshop; Shelly Holzerland, Fremont Dodge County 911 Director; Neil Miller, Buffalo County Sheriff; Captain Phillip Brazelton, Washington County Sheriff's Office; David Sleeter, Omaha Emergency Communications Center Director; Geneie Andrews, GIS Workshop; Kyle McBride, GIS Workshop; Richard Kelly, 911 Datamaster; Loel Brooks, Attorney; Kara Thielen, Consultant for Viaero Wireless; Eric Herbert, Sarpy County GIS Coordinator; Phil Bush, City of Lincoln GIS Analyst; Jeffrey McReynolds, Lincoln/Lancaster County GIS Program Manager; Tom Casady, City of Lincoln Public Safety Manager; Julie Righter Dove, Lincoln Emergency Communications Center; Steve Malina, Saunders County Sheriff's Office; Margaret Bruner, Saunders County Sherriff's Office; Gary Warren, Hamilton Telecommunications; Bruce Hardesty, R&S Digital Services; Stacen Gross, GeoComm; and Bruce Schneider, R&S Digital Services

In addition to those present in the hearing room, the following persons participated via telephone bridge and announced their presence during roll call at the beginning of the workshop: Mike Schonlau, Douglas County Nebraska GIS; Scott Bohler, Frontier Communications; Kevin Eckhoff, CenturyLink; Joel Thomas, Charter Fiberlink-Nebraska, LLC & Time Warner Cable; Janelle Bartles-Heuton, GIS Workshop; Lori Holcomb, Airbus DS Communications; Joanie Houti, Southeast Community College; David Peck, West Safety Services; Chris Schau, West Safety Services; Cyndi Gallagher, AT&T; Kim Meyers, GIS Coordinator R&S Digital; Jim Carlson, CenturyLink; Don Gale, Technologies Management; and Robert Horne, Mission Critical Partners.

DISCUSSION

As stated above, interested parties were given the opportunity to respond to the questions presented by the Commission in written form and also participate in a discussion of the issues during the workshop. An overview of the responses to each of the questions follows below:

QUESTION 1:

National Emergency Number Association (NENA) standards provide that certain GIS data layers, such as street centerline, PSAP boundaries, and emergency service boundaries are designated as "core" or required data layers, while other GIS data layers, such as address points, cell site and sectors, and state, county, and

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municipal boundaries are designated as "highly recommended" under NENA standards.

• Should the Commission prioritize funding of the NENA core layers over recommended layers?

Most commenters who responded in written form supported the prioritization of funding for the NENA recommended layers in addition to the core layers. Written comments also noted that the Request for Proposal issued by the Commission in 2004 with respect to GIS issues allowed for funding for all recommended layers except the address point layer. Both confidential commenters and public commenters such as Airbus, GeoComm, and R&S Digital argued in particular that the address point layer should be prioritized for funding.

Various points of view were expressed by commenters at the workshop with respect to the priority of the core and recommended layers, in particular the address point layer.

Stacen Gross, representing GeoComm ("GeoComm") recommended that the Commission provide funding for address point layers, in addition to the NENA core layers. He noted that his company is involved in NG9-1-1 projects in 12 other states, all of which are requiring address point layers. In addition, he said 25% of the 62 Nebraska counties that are GeoComm clients already have address points. He stated that address locations will be used to route 911 calls, so there needs to be a data layer with points on the road or points on structures, rather than a range on the centerline of the road. He also noted that address points are useful for other governmental purposes in addition to 911 services.

Joseph Heiecke of vendor GIS Workshop ("GISW") stated that his company provides GIS services to approximately 30 Nebraska counties for 911 purposes and that approximately 25 to 30 percent of GISW already have an address point layer.

Sheriff Neil Miller of Buffalo County ("Sheriff Miller") reported that his county has an address point layer in place and it is used multiple times per day for 911 services. He also conveyed that he considered the address point layer to be very important for public safety. He further noted that the other layers already exist, so unlike the address point layer, there is no need to allocate funding to the creation of the core layers.

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Bruce Schneider of R&S Digital stated that although the address point layer is not a core layer as determined by NENA, it would be unusual in his experience to not include the address point layer as part of a NG9-1-1 project. He also stated that it would make the most sense to create the address point layer at the same time as the core layers, i.e., road centerlines, PSAP boundaries, and emergency service boundaries. He stated that doing the address point layer later on would unnecessarily complicate and greatly increase the cost of the overall project, because the creation of each new layer of data will require adjustments to all the existing layers as the data is refined. So, the creation of a new layer would require opening up all the existing layers anyway.

Richard Kelly of 911 Datamaster ("Datamaster") noted that NENA standards with respect to core and recommended GIS data layers are still undergoing a year-long process of revision, with no apparent end in sight. He argued that accurate polygons, such as PSAP boundaries and ESN boundaries, were more important than address points and street centerlines. In his opinion, address point layers are like icing on a cake, but polygons are essential. This is because in the NG9-1-1 environment, polygons will be critical to routing the call to the correct PSAP. He stated wireless call routing will occur via an assessment of a call's coordinates within the polygon formed by the PSAP boundaries, not by street centerlines or address points.

Jeff Timm of the OCIO stated that road centerlines were of key importance because they relate to PSAP and ESN boundaries. In many cases, road centerlines are right on the boundaries, so it is doubly important that they be accurate.

Robert Horne, of Mission Critical Partners ("MCP"), stated that road centerlines were the most important layer, so MCP recommends that centerlines be prioritized first. Horne said that it is critical that address ranges on road centerlines do not overlap. Also, the road centerlines are a much easier lift than PSAP boundaries, which in some cases across the state are based on descriptions of local geographical features, rather than legal descriptions. He further stated that making sure that road centerline data is as absolutely accurate and getting a high match rate with the Master Street Address Guide ("MSAG") and the Automatic Location Identification ("ALI") database, will make it easier to transition from MSAG & ALI to the Emergency Call Routing Function ("ECRF") and Location Validation Function ("LVF") of NG9-1-1.

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QUESTION 2:

The forthcoming NENA standard for NG9-1-1 GIS data will "strongly advise" PSAPs to go through the process of standardizing and synchronizing existing GIS data with the Master Street Address Guide (MSAG) to a 98% or greater match rate (with optional ALI matching) before using GIS data for NG9-1-1.

- What tools and/or vendors are available to provide such matching services?
- Should the Commission prioritize funding for PSAPs to synchronize their MSAG and GIS data by paying for such matching outside the 911-SAM funding model?
- Should the Commission issue a statewide Request for Proposal (RFP) for MSAG and GIS matching services?
- \bullet Should any such RFP also include quality assurance and quality control (QA/QC) services to validate the MSAG/GIS match?

Written commenters reported that there were various tools available to assist with synchronizing the MSAG and GIS data. Commenters such as Airbus, GeoComm, and R&S Digital reported that they were in the business of providing such tools to clients. David Peck of West Safety Services also reported that his company has tools for matching the MSAG and ALI with a client's GIS data.

Most confidential and public commenters also supported both the prioritization of funding to match the MSAG and GIS data and the issuance of statewide RFPs to find vendors to provide synchronization and QA/QC services. However, GeoComm and Viaero were generally opposed to both such funding prioritization and the issuance of statewide RFPs. GeoComm argued that they already provide such services to their clients, so additional vendors would duplicate efforts and increase costs. GeoComm also suggested that the QA/QC function could be performed by Commission GIS staff, which may provide a cost savings. Viaero opined that existing vendors GeoComm and GISW already provide a good level of service in these areas, so additional vendors would not be necessary.

Commenters at the workshop also identified various tools that are available to synchronize the MSAG and ALI with GIS

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data. In addition to the vendors mentioned above, it was noted that leading international GIS supplier ESRI has a tool called Data Reviewer for this purpose that can be used on its own or in conjunction with other vendors' tools. GISW reported that it both used the ESRI tool and had custom tools available for clients.

Stacen Gross of GeoComm stated that GIS vendors who have maintenance contracts with clients should already be required to synchronize existing data. He stated that GeoComm considers this part of the normal service they provide to clients. continued that additional funding should not have to be provided for this purpose. He would recommend having Commission staff or PSAP staff use the tools to check data, and then require the related vendor to correct any gaps or mistakes under their maintenance agreement. Gross stated that GeoComm already does an annual true up of MSAG and GIS data. He said the initial match rate is approximately 70 to 80 percent, and after additional clean up, the match gets to the high 80 percent or low 90 percent range. Gross stated that many gaps can be explained due to the circumstances of a particular location. said that because Nebraska data has already been created, this should be a maintenance project, with only minor issues in the data.

Bruce Schneider of R&S Digital agreed that data review tools for doing a gap analysis can be operated by in-house staff in order to achieve a significant cost savings. However, he stated that it was critically important to have someone other than the vendor to do the QA/QC or "gap analysis" of the data. Based on his company's experience in other jurisdictions, Schneider stated that bringing existing GIS data up to NG9-1-1 standard will require more than just routine maintenance of the data. He noted that it is too early to say how extensive the required corrections may be, since the data has not yet been analyzed against any particular standard. Schneider also argued that automated tools are not foolproof. He said a manual review of GIS maps will often find things that an automated tool may have missed.

Bruce Hardesty of R&S Digital noted that in other states, even very small rural counties with populations of 1500 or less have presented over 500 MSAG errors, with many more errors in more populous counties. So, he said, matching the MSAG to the road centerline file is a great deal of work.

Several commenters, including Stacen Gross of GeoComm, Jeff Timm of the OCIO, and Jeff McReynolds of Lincoln/Lancaster

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County stressed the importance of using QA/QC tools on a statewide basis, rather than county by county. It is important that GIS data such as road centerline data be consistent across boundaries and between counties. In particular, Stacen Gross of GeoComm recommended that analysis tools should be used on statewide data, with reports going back to the persons with responsibility for maintenance on local GIS datasets.

Issues associated with correcting gaps and slivers between polygon boundaries were also raised by commenters at the workshop. Bruce Hardesty of R&S Digital noted that fire districts as reflected in tax records will not necessarily be exactly the same as those districts recognized by PSAPs or fire departments. Sheriff Miller noted to general agreement that it was absolutely not the role of the GIS QA/QC process to impose changes on the borders of political subdivisions such as fire districts, in order to correct gaps and slivers in GIS data. He stressed the importance of interlocal agreements between jurisdictions to resolve apparent gaps in mapping data.

Richard Kelly of Datamaster noted that there are inherent difficulties in achieving a full 98% match of the MSAG with road centerline GIS data, because those are two databases created at different times, by different people for different purposes. He stated that there will always be items that cannot be fully reconciled between the two datasets, for example truncated ranges of address numbers. He conveyed that a 98% match is a reality check to make sure the GIS aligns with what is already in the 911 system, but, he argued, the MSAG is a transitional dataset that will not affect call routing, unlike road centerlines coupled with polygons.

Jeff Timm of the OCIO, Richard Kelly of Datamaster, and Robert Horne of MCP each noted that there can be significant costs associated with changes to the MSAG, both in terms of the work performed and fees demanded by the carriers. Robert Horne stated that it is impossible to get to 98% match between the MSAG and GIS data without changing the MSAG. For example, infrastructure changes made many years ago may have resulted in houses being torn down to make way for some kind of public facility. Those old house number may still be in the MSAG and that needs to be fixed. The MSAG may have to run parallel to NG9-1-1 for a while, so those changes do have to be made.

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QUESTION 3:

Traditionally, the Commission has provided funding for third party GIS services to PSAPs from only two vendors, GIS Workshop and GeoComm.

- Should the Commission make available funding for PSAPs to contract with additional third party GIS vendors?
- Should the Commission issue an RFP to identify other reputable third-party GIS vendors?
- What minimum standards should the Commission include in any such RFP for third-party GIS services?

Written comments received from interested parties indicated general agreement that funding should be made available to PSAPs for additional third party GIS vendors. It is worth noting, however, that five commenters in favor of providing such funding are also GIS vendors who may benefit from such a change in policy. Of the commenters who stated an opinion, only Viaero was opposed to funding additional GIS vendors. Current vendor GeoComm declined to state an opinion, but noted that it was unaware of any rule precluding the use of other GIS vendors. GeoComm also stated that it may not be in the Commission's best interest to spend time and money on an RFP to identify additional GIS vendors.

At the workshop, Joe Heiecke of GISW noted that current GIS vendors already have access to the existing data and are familiar with county personnel across the state. He stated the opinion that bringing in additional vendors might result in duplication of effort and increased costs.

Kara Thielen informed the workshop that she had been directly involved in the 2004 RFP that established GeoComm and GISW as the Commission's two "vendors of choice" for 911-related GIS services. She stated that the whole purpose of the RFP was to limit the number of vendors so that data would be more consistent. She agreed with earlier comments from Stacen Gross of GeoComm and Joe Heiecke of GISW that the vendors should be responsible under their contracts to correct errors found in the data.

However, most commenters who stated an opinion at the workshop were in favor of approving funding for additional GIS vendors. David Peck of West Safety Services urged that additional GIS vendors should be allowed to participate. He

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noted that a lot has changed since 2004, and there are now a lot more vendors with NG911 experience. He stated that his company recommends that the Commission issue a new RFP. Jeff Timm of the OCIO cautioned that the state should maintain significant oversight of the selection of GIS vendors, due to the highly specialized and technical nature of the work.

A number of commenters at the workshop had suggestions for items to be included in a potential RFP. Jeff McReynolds of Lincoln/Lancaster County advised seeking additional vendors with a prior history of data migrations, who had worked with both NENA and the State GIS council. Richard Kelly of Datamaster recommended prioritizing new vendors who have been involved in setting current and upcoming GIS standards on a national basis. Bruce Schneider of R&S Digital suggested vendor payments be tied to passing QA/QC standards, such that 80% of a vendor billing be paid when a submittal attains 95% accuracy, with the remainder paid when 100% is achieved.

Ouestion 4:

Traditionally, the Commission has provided funding for inhouse GIS personnel only to the PSAPs in Douglas, Lancaster and Sarpy counties.

- Should the Commission make funding available for inhouse GIS personnel to all PSAPs?
- If so, what minimum qualifications, if any, should a PSAP's GIS personnel have before being approved for such funding by the Commission?
- Should such funding be available for both employees and independent contractors?

All written commenters, with the sole exception of Viaero, were in favor of permitting all PSAPs to use in-house personnel for GIS purposes, both as employees and independent contractors. Each of the written commenters also provided suggested qualifications for in-house GIS personnel, most of which focused on setting minimum levels of training and experience.

Commenters who participated in the workshop were generally not opposed to allowing in-house GIS personnel to be used by additional PSAPs, however, concerns were expressed regarding cost, consistency of data quality, and the convenience of being able to leverage local resources.

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Captain Phil Brazelton of Washington County noted that his county had a highly qualified GIS contractor available to provide 911-related GIS services who had already been working for other county departments for a number of years. He stated that it was not a good policy to allow only three counties to use in-house GIS personnel for 911 purposes, because other counties could benefit from this option as well.

Stacen Gross of GeoComm, Jeff McReynolds of Lincoln/Lancaster County, and Jeff Timm of the OCIO agreed that counties should be able to use in-house GIS personnel for 911 purposes. However, Timm cautioned that a part-time person will not be sufficient to meet the need for GIS services, so a county with a part-time GIS person will also need to work with a dependable vendor. Gross suggested that Commission personnel could use QA/QC tools as a check and balance on data quality for counties with a part-time GIS person, and require the use of a vendor or other remedies if the data is not up to standard. David Sleeter of Omaha recommended pre-approval of in-house GIS hires by the Enhanced Wireless 911 Advisory Board, followed by a QA/QC review of the resulting work product.

Joe Heiecke of GISW stated that vendors can augment the services provided by in-house GIS departments. He noted there are risks for counties hiring in-house GIS talent, especially in rural areas. He argued that in the absence of family ties to an area, some employees may use the opportunity to obtain training for a year or so before moving on to greener pastures. He also stressed the importance of qualifications, and that a county could not simply add GIS duties to the responsibilities of an existing employee and expect a good outcome. He stated that a reputable GIS vendor works within a county's budget constraints on a more economical basis than it would take to hire a new employee.

Due to the apparent consensus on this question, and the urgency with which Captain Brazelton expressed Washington County's desire to work with in-house personnel, the Commission determined that it would be appropriate to allow additional counties to use in-house personnel to provide 911-relatd GIS services. An order permitting the use of in-house personnel by Washington County was issued by the Commission subsequent to the workshop.²

² In the Matter of the Nebraska Public Service Commission, on its own motion, to implement provisions of LB 1222 [2006] and to establish a permanent funding mechanism for wireless enhanced 911 service, Application No. 911-

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Ouestion 5:

The Nebraska Information Technology Commission (NITC) GIS Council has adopted Standards and Guidelines for GIS data applicable to all state government agencies, state funded entities, and public entities in Nebraska (NITC Standards and Guidelines).

• Should the Commission require that GIS data used in connection with the 911 service system in Nebraska be in compliance with the NITC Standards and Guidelines?

All of the written commenters who responded to this question unanimously agreed that the Commission should adopt NTIC Standards and Guidelines. In addition, Airbus and Viaero recommended that the NITC standards be carefully reviewed for consistency with NENA standards. R&S Digital reported that their comparison of the two standards revealed some aspects of the NITC standards that were above and beyond NENA standards. R&S Digital noted that full compliance with such provisions might add to the cost and time required to fully develop road centerline data, even though such items would also be relevant and useful.

Commenters who participated in the workshop were also unanimously in favor of adopting the NITC Standards and Guidelines for the Nebraska 911 service system.

Joe Heiecke of GISW recommended that detailed standards be expressly adopted in the case of certain provisions where the NITC and NENA standards allow for a range of options that jurisdictions may select. He stated that the options that are selected should be consistent statewide, and not vary from county to county. In addition, he recommended that any GIS standard that is officially adopted be kept in place for at least five years, particularly with respect to core layers. He opined that more rapid changes are a burden on those responsible for maintaining the data and may also undermine data consistency.

019/PI-118, PROGRESSION ORDER NO 6, (May 5, 2017); In the Matter of the Nebraska Public Service Commission, on its own motion, seeking to administer funding for public safety answering points for the implementation and provision of Enhanced Wireless 911 service: Washington County, Application No. 911-042.38, ORDER MODIFYING FUNDING (May 5, 2017).

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CONCLUSIONS

After considering the written comments received before and after the workshop, the verbal comments of participants at the workshop, and the recommendations of staff, the Commission directs that the following actions be taken:

Funding of NENA's Core and Recommended GIS Layers

The Commission will permit PSAPs to use annual funding allocations and/or set-aside funds to pay for costs associated with the development of the GIS address point layer to the same extent as each of the NENA core and recommended layers described in the Commission's request for proposal issued in 2004. Commission staff is directed to develop a policy governing the approval of such funding which shall include, at a minimum, standards for determining the placement of each address point based on property characteristics, quality standards and uniform requirements for pricing disclosure.

QA/QC Services and Synchronization of GIS data with MSAG

Commission staff is directed to develop and issue an RFP for QA/QC services and for synchronization of appropriate GIS data with the MSAG. The QA/QC vendor selected shall not be the same as the vendor selected for synchronizing GIS data with the MSAG.

The level of synchronization to be required under the RFP shall be 98%. The selected synchronization vendor[s] shall be entitled to receive 80% of their fees payable upon confirmation of an 80% data match and the remainder upon confirmation of a 98% data match.

Third Party GIS Services

Commission staff is directed to develop and issue a new RFP to identify reputable third party GIS vendors to provide services in support of the Nebraska 911 service system. The Commission's traditional vendors of choice and all other qualified GIS vendors shall be invited and encouraged to respond to such RFP.

Approval of In-house GIS Personnel

As mentioned above, the Commission has previously concluded that all PSAPs shall be permitted to employ in-house GIS personnel under appropriate circumstances. Commission staff is

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directed to develop a policy governing the use of in-house GIS personnel, including but not limited to the minimum qualifications such GIS in-house personnel must have before being approved for funding by the Commission.

Adoption of NITC Standards and Guidelines

Commission staff is directed to prepare an appropriate Order adopting the NITC Standards and Guidelines for the Nebraska 911 Service System.

ORDER

IT IS THEREFORE ORDERED by the Nebraska Public Service Commission that Commission staff is directed to take the actions directed herein above.

ENTERED AND MADE EFFECTIVE at Lincoln, Nebraska, this $12^{\rm th}$ day of September, 2017.

NEBRASKA PUBLIC SERVICE COMMISSION

COMMISSIONERS CONCURRING:

Chairman

ATTEST:

Executive Director

//s//Frank E. Landis
///s//Tim Schram

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Appendix A

- 1. National Emergency Number Association (NENA) standards provide that certain GIS data layers, such as street centerline, PSAP boundaries and emergency service boundaries are designated as "core" or required data layers, while other GIS data layers, such as address points, cell site and sectors, and state, county and municipal boundaries are designated as "highly recommended" under NENA standards.
 - Should the Commission prioritize funding of the NENA core layers over recommended layers?
- 2. The forthcoming NENA standard for NG9-1-1 GIS data will "strongly advise" PSAPS to go through the process of standardizing and synchronizing existing GIS data with the Master Street Address Guide (MSAG) to a 98% or greater match rate (with optional ALI matching) before using GIS data for NG9-1-1.
 - What tools and/or vendors are available to provide such matching services?
 - Should the Commission prioritize funding for PSAPs to synchronize their MSAG and GIS data by paying for such matching outside the 911-SAM funding model?
 - Should the Commission issue a statewide Request for Proposal (RFP) for MSAG and GIS matching services?
 - Should any such RFP also include quality assurance and quality control (QA/QC) services to validate the MSAG/GIS match?
- 3. Traditionally, the Commission has provided funding for third party GIS services to PSAPs from only two vendors, GIS Workshop and GeoComm.
 - Should the Commission make available funding for PSAPs to contract with additional third party GIS vendors?
 - Should the Commission issue an RFP to identify other reputable third-party GIS vendors?
 - What minimum standards should the Commission include in any such RFP for third-party GIS services?

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- 4. Traditionally, the Commission has provided funding for inhouse GIS personnel only to the PSAPs in Douglas, Lancaster and Sarpy counties.
 - Should the Commission make funding available for inhouse GIS personnel to all PSAPs?
 - If so, what minimum qualifications, if any, should a PSAP's GIS personnel have before being approved for such funding by the Commission?
 - Should such funding be available for both employees and independent contractors?
- 5. The Nebraska Information Technology Commission GIS Council has adopted Standards and Guidelines for GIS data applicable to all state government agencies, state funded entities, and public entities in Nebraska (NITC Standards and Guidelines).
 - Should the Commission require that GIS data used in connection with the 911 service system in Nebraska be in compliance with the NITC Standards and Guidelines?
- 6. Please comment as to any other issues that the Commission should address with respect to GIS data for the Nebraska 911 service system.