



Montana Association of Counties

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Rhonda Sullivan
Montana Department of Administration
PO Box 200113
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Re: Notice of Public Hearing on Proposed Adoption of New Rules I – VIII, PSAP Certification

To Whom It May Concern:

The Montana Association of Counties requests consideration of modifications to the proposed rules as published in advance of the January 12th, 2018 hearing. It is our understanding that the new rules, in addition to the “list of allowable uses” promulgated and maintained by the Department of Administration, will allow funds distributed to PSAPs from the 9-1-1 systems account established by 10-4-304, MCA, to be used for ongoing operational expenses. We believe the original intent of the funds was to be used for capital expenditures and other 9-1-1 related one-time expenditures, and not used for ongoing operational expenses. We urge the Department to adhere to the original intent and clarify that use of these funds is restricted to one-time expenditures.

Additionally, it appears that regional PSAP facilities or PSAP’s that cover multiple jurisdictions would be required to renew agreements, Memorandum of Understanding’s, and/or interlocal agreements on a two-year basis in order to satisfy the certification requirements. We request clarification that extended duration agreements will suffice at the time the designated PSAP applies for certification on the two-year cycle contemplated in the proposed rules. For example, a hosting PSAP may enter into a longer-term agreement with a local government in order to invest in significant system upgrades or capital expenditures. Longer term agreements will allow for the up-front investment. The agreement duration should not be tied to the PSAP certification; rather the PSAP certification should require the agreements be in place for the duration of the certification.

We thank you for the opportunity to comment and look forward to our continued participation in the Advisory Council.

Sincerely,

Bill Barron
President, Montana Association of Counties