

CHARLES D. LEMMOND, JR.
SENATE POST OFFICE
THE STATE CAPITOL
HARRISBURG, PA 17120-3020
717-787-7428
1-800-722-2251

20TH SENATORIAL DISTRICT OFFICE
22 DALLAS SHOPPING CENTER
MEMORIAL HIGHWAY
DALLAS, PA 18612-1231
717-675-3931



Senate of Pennsylvania

May 24, 1999

Original: 2019, 2020, 2021
Mizner
cc:

COMMITTEES
STATE GOVERNMENT, CHAIRMAN
MILITARY AND VETERANS AFFAIRS,
VICE CHAIRMAN
FINANCE
JUDICIARY
RULES AND EXECUTIVE NOMINATIONS

McGinley
Jewett
Tyrrell
Sandusky
Legal
Notebook

Mr. Robert Nyce
Executive Director
Independent Regulatory Review Commission
14th Floor, Harristown 2
333 Market Street
Harrisburg, Pennsylvania 17101


Re: Proposed Rulemaking
Pennsylvania Emergency Management Agency
Regulations #30-51, #30-52, and #30-53

Dear Mr. Nyce:

Members of the Senate State Government Committee have been afforded the opportunity to review and comment upon Proposed Regulations from the Pennsylvania Emergency Management Agency, Public Safety Emergency Telephone Program which would amend 4 Pa. Code, Chapters 120b, 120c, and 120d.

Please be advised that, as of this date, I have received one letter from Mr. L. Guy Napolillo, 9-1-1 Coordinator from Fayette County Emergency Management, in response to these proposed regulations. I enclose a copy of the letter submitted by Mr. Napolillo and would ask that his comments be given all due consideration.

If you have any questions regarding these proposed regulations and the Committee review, please do not hesitate to contact Cynthia Thurston of my staff at 787-7428.

Sincerely,

CHARLES D. LEMMOND JR.
SENATOR

CDL:cdt

cc: Attorney Mark L. Goodwin,
Pennsylvania Emergency Management Agency



FAYETTE COUNTY EMERGENCY MANAGEMENT



Fayette County Public Service Building
24 East Main Street

(724) 430-1277

Uniontown, Pennsylvania 15401

Original: 2019, 2020, 2021

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cc:

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FAYETTE COUNTY
EMERGENCY MANAGEMENT

April 28, 1999

Sen. Charles D. Lemmond Jr.
Chairman, State Government Committee
Room 203020
State Capitol
Harrisburg PA 17120

Sen. Lemmond:

After reviewing the proposed draft regulations pertaining to Training and Certification Standards for 9-1-1 Emergency Communications Personnel I feel that there may be a need for some minor changes in the language of the proposed regulations. Primarily the paragraphs in 120c.102 Call Taker Certification, 120c.103 Emergency Dispatcher Certification and 120c.104 9-1-1 Center Supervisor Certification. Under Certification in all sections noted, it states that the "Agency" (PEMA) will **prescribe** both the written examination as well as the practical test to be administered to the call-takers, dispatchers and supervisors.

After much consideration and discussion with PSAP managers in western Pennsylvania as well as PEMA representatives, I believe that the changing of the word **prescribe** to **approve** in the regulations would enable this legislation to be implemented in a more efficient manner. While some basic training issues remain consistent throughout all PSAPs in Pennsylvania, many PSAPs incorporate localized equipment, geographical, and procedural issues into their respective training programs. Simply put, PEMA could develop key elements for training and certification and review the PSAP training outlines and tests to assure these elements were covered.

I am also concerned about the certification process for the instructors discussed in the proposed legislation. Many PSAP instructors are already certified through a number of Federal, national and/or state recognized agencies and this component may be simply redundant. Proof of existing instructor certification could be provided to PEMA.

I would appreciate your consideration of these key issues to the proposed legislation and await your response.

Sincerely,

L. Guy Napolillo
9-1-1 Coordinator



FAYETTE COUNTY EMERGENCY MANAGEMENT

Fayette County Public Service Building
24 East Main Street
Uniontown, Pennsylvania 15401



(724) 430-1277

April 28, 1999

Mr. Mark Goodwin, Chief Counsel
Pennsylvania Emergency Management Agency
PO Box 3321
Harrisburg Pa. 17105

Mr. Goodwin:

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Sincerely,

L. Guy Napolillo
9-1-1 Coordinator

DRAFT LETTER

ORIGINAL: 2019, 2020, 2021

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INDEPENDENT REGULATORY
REVIEW COMMISSION

Mark Goodwin, Chief Counsel
 Pennsylvania Emergency Management Agency
 PO Box 3321
 Harrisburg, Pa 17105

Dear Mr. Goodwin:

In accordance with the Independent Regulatory Review Commission process, the House Veterans Affairs and Emergency Preparedness Committee has formally reviewed Proposed Regulations #30-51, 30-52 and 30-53. The following points of interest were raised at our committee meeting, and were requested to be forwarded to your office by several committee members.

- 1) Under current Regulation 120b.104(XXVIII), dispatchers are required to have a minimum of 40 hours classroom and hands-on instruction. Will this minimum requirement be raised under this section, or will this section be deleted in view of the fact that Section 120c(proposed) will establish increased training standards? As well, what will this minimum hourly training requirement be?
- 2) In terms of written exams for 911 center personnel (120c), the committee was informed that a 75% correct score would be an acceptable passing grade. Minority Chairman Tom Michlovic, and others, suggested that this minimum passing grade percentage may be too low.
- 3) In terms of the perceived conflict between union contracts and these proposed regulations, as was suggested by the City of Philadelphia, is there any merit to this accusation? How does your agency plan to address this issue?
- 4) In terms of the Right-to-Know Law as applied to 911 center data/information, will the phone tape records of individual dispatchers (section 120c.107) be considered public information under the Right-to-Know law?
- 5) In terms of the accuracy standards for 911 database systems (120b.112), there was some discussion on the ability of county 911 centers to maintain a 95% accuracy rate. Is this 95% accuracy rate attainable? As well, there was some questioning on whether or not the downloading of the LEC customer database into the county MSAG database was a plausible practice which all county 911 centers could uniformly perform. Are the LECs better equipped to load this data?

The committee would also like to submit two (2) public comment documents which were sent to various legislators on this issue. We would appreciate your office reviewing the merits of these enclosed comments and suggestions.

Sincerely,

Paul W. Semmel
 Majority Chairman
 House Veterans Affairs and
 Emergency Preparedness Committee

Thomas A. Michlovic
 Minority Chairman
 House Veterans Affairs and
 Emergency Preparedness Committee

ROL/smg