Federal Communications Commission
Washington, D.C. 20554

December 6, 2016

Standard Occupational Classification Policy Committee
United States Bureau of Labor Statistics
2 Massachusetts Avenue NE, Suite 2135
Washington, DC 20212

RE: 2018 SOC Classification of Public Safety Telecommunicators

Dear Members of the Committee:

I am writing today to provide the perspective of the Public Safety & Homeland Security Bureau (Bureau) of the Federal Communications Commission regarding the ongoing issue of classification of public safety telecommunicators. The Bureau is responsible for the implementation of the Commission's regulations and policies with respect to public safety communications, which includes the nation's 911 system. In that capacity, we work closely with state and local agencies that operate the nation's Public Safety Answering Points (PSAPs) responsible for 911 call-handling and dispatch. In addition, as the federal agency with primary regulatory responsibility for the nation's communications sector, we are very familiar with -- and have observed first-hand -- the impact of "next-generation" communications technology in changing and expanding the typical scope of work performed by many public safety telecommunicators. Because the new occupational classifications that you are developing will be in effect for a 10-year period, we believe it is important that the classifications accurately reflect these ongoing trends.

Currently, the nearly 100,000 men and women working as 911 call-takers and dispatchers are classified under the "Police, Fire, and Ambulance Dispatcher" category (43-5031), which is grouped within Standard Occupational Classification (SOC) Major Group 43-0000, "Office and Administrative Support Occupations," a category that also includes commercial and other non-public safety call-takers and dispatchers, as well as many other categories of administrative workers. In response to the May 22, 2014, *Federal Register* Notice seeking comment whether this classification should be modified,[1] the Standard Occupational Classification Policy Committee (SOCPC) received comments advocating (1) that employees working in this field receive a new occupational classification as "public safety telecommunicators," "emergency service telecommunications specialists," or "911 communications operators," and (2) that this

[1] *See* 79 Fed. Reg. 29620, May 22, 2014.

classification be moved from Major Group 43-000 to Major Group 33-000, "Protective Services Occupations."[2]

The SOCPC has initially declined to accept these recommended changes, stating that in its view the work performed by public safety telecommunicators "is that of a dispatcher, not a first responder," and that separating public safety telecommunicators from other dispatcher categories "would be confusing."[3] The SOCPC also recommended against reclassification on the grounds that '[m]ost [public safety] dispatchers are precluded from administering actual care, 'talking' someone through procedures, or providing advice,"[4] and that they are "often located in a separate area from first responders and have a different supervisory chain."[5]

Based on our experience working with the 911 community, the SOCPC's initial findings appear to reflect an incomplete and inaccurate understanding of the work performed by today's public safety telecommunicators. As you enter the next phase of the decision-making process, we urge you to carefully consider the comments that have been submitted in response to the SOCPC's initial findings by public safety organizations and individual telecommunicators.[6] Among other things, these comments document that in the current 911 system, public safety telecommunicators: (1) under established protocols and procedures, provide assistance, guidance, and life-saving advice to 911 callers in many emergency situations;[7] (2) are involved in the planning, coordination, and direction of response activities both before and after emergency personnel are dispatched to the scene;[8] (3) receive specialized and rigorous training in emergency response and crisis management skills;[9] and (4) operate within organizations and under chain-of-command structures that group them with other public safety professionals, including police, fire, and emergency medical personnel.[10]

We also believe that your classification analysis should be informed by the impact that the transition to Next Generation 911 (NG911) is already having and will continue to have on the work performed by public safety telecommunicators. Throughout the next decade, the Nation's PSAPs will be at the center of this transition as they migrate from legacy circuit-switched telephone technology to Internet Protocol (IP) based networks that will support not only 911

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[2] *See, e.g.,* Comments of APCO International (2014).

[3] *See* United States Bureau of Labor Statistics (BLS), at http://www.bls.gov/soc/2018/soc_responses.htm.

[4] *Id.*

[5] *Id.* The Office of Management and Budget has sought comment on SOCPC's initial recommendations. *See* 81 FED.REG. 48303 (July 22, 2016).

[6] *See, e.g.*, Comments of APCO International (filed Sep. 20, 2016) (APCO 2016 Comments); Comments of the National Emergency Number Association (NENA) (filed Sep. 20, 2016) (NENA 2016 Comments); Comments of Texas 9-1-1 Alliance (filed Sep. 13, 23016, *via* regulations.gov) (Texas Alliance 2016 Comments).

[7] *See* NENA 2016 Comments at 2; Texas Alliance 2016 Comments at 1; APCO 2016 Comments at 8-10.

[8] *See* Texas Alliance 2016 Comments at 1; NENA 2016 Comments at 2-3.

[9] *See* Texas Alliance 2016 Comments at 1-2; APCO 2016 Comments at 7, 13-14; NENA 2016 Comments at 5-6.

[10] *See* NENA 2016 Comments at 4-5; APCO 2016 Comments at 20-21.

voice communications but also text, data, and video, data analytics, GIS mapping, and targeted alerting. Even in the early stages of this transition, the shift in technology is leading to an evolution in the role of public safety telecommunicator, which increasingly encompasses not only call-taking and dispatch, but also the integration and analysis of multiple sources of information to determine the appropriate response to any given emergency.

Today, many PSAPs are also taking on a new role in which they not only receive 911 calls and dispatch first responders, but also analyze external information sources, such as photos; video from police body cameras, traffic cameras, or other publicly accessible cameras; machine-to-machine sensor inputs, such as Shot-Spotter; and alarms indicating traffic flow. Synthesizing this information as a team, telecommunicators in the PSAP disseminate alerts or "reverse 911" calls to the public as part of the emergency response. They coordinate activities with other agencies and, at times, are brought directly into the response when an on-scene participant engages the telecommunicator for mediation or other de-escalating effort. These trends provide clear indication of the expanded scope of responsibility for public safety telecommunicators that exists in the NG911 environment.

The sweeping changes in the role of public safety telecommunicators have been documented in detail in a report issued on December 2, 2016, by the Task Force on Optimal PSAP Architecture (Task Force), an expert advisory group convened by the Commission to provide guidance to PSAPs on how to optimize technology, operations, and funding to support the migration to NG911.[11] The report, issued by Working Group 2 of the Task Force to assist PSAPs in assessing their NG911 readiness, describes the changing role of the public safety telecommunicator in the current 911 environment and the additional evolution that will occur as PSAPs transition to NG911:

> The public safety telecommunicator's position has transformed from a clerical staff handling telephone calls and incidents with manual methods, to technically savvy protective service professionals managing multiple integrated technology systems to track and manage public safety field resources and responses. The public safety telecommunicator position will continue its evolution with the integration of Next Generation 911 technologies.[12]

The Task Force Report confirms that in the current 911 environment, public safety telecommunicators already have multi-faceted responsibilities and must meet highly specialized training and certification requirements related to emergency response:

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[11] *See generally*, Federal Communications Commission, Task Force on Optimal Public Safety Answering Point Architecture (TFOPA), at https://www.fcc.gov/about-fcc/advisory-committees/general/task-force-optimal-public-safety-answering-point.

[12] *See* TFOPA Working Group 2, Phase II Supplemental Report: NG9-1-1 Readiness Scorecard at 55, Sec. 4.11.1, https://transition.fcc.gov/pshs/911/TFOPA/TFOPA_WG2_Supplemental_Report-120216.pdf (TFOPA Supp. Report) (issued Dec. 2016).

> [P]ublic safety telecommunicators are required to operate a sophisticated work station comprised of multiple networked computer and technology systems. . . . [as well as] be able to quickly answer, elicit pertinent information from a distraught caller, analyze given information, and expediently make appropriate entries into various technology systems. Additionally, in many jurisdictions public safety telecommunicators are required to be licensed or certified as public safety telecommunicators, hold State Criminal Justice Information System and Federal Bureau of Investigation National Crime Information Center access permissions and also be certified emergency medical dispatchers. In many jurisdictions, oftentimes public safety telecommunicators need certifications in cardiopulmonary resuscitation (CPR) and in automated external defibrillation (AED).[13]

The Task Force Report also highlights the ways in which the transition to NG911 will further expand the responsibilities of public safety telecommunicators:

> New skill sets will be needed for 9-1-1 Telecommunicators [including] how broadband implications and implementations will affect the PSAP. . . . NG9-1-1 technology will enable PSAPs to utilize broadband data in ways that will transform how the public reaches 9-1-1 and how telecommunicators communicate with first responders. Other IP-based technologies, including those supported by smartphones, tablets, and mobile apps, are available throughout the general public and are capable of sending an array of information to the PSAP. As a result, PSAPs of the future will be the nerve center, managing data-rich communications via broadband technology with 9-1-1 callers and first responders. 9-1-1 Authorities need to be mindful that NG9-1-1 and Public Safety broadband operations and policies should be built into PSAP training and education.[14]

The Task Force also found that the convergence of communications in the PSAP around Internet Protocol-based networks, databases, and terminals, creates an additional need for telecommunicators to be aware of cybersecurity threats and trained to recognize, avoid, respond, and recover from cyberattacks. This year alone, a spate of ransomware and telephone denial-of-service (TDoS) attacks have hit the PSAP community, placing additional professional demands on telecommunicators.

The occupational classifications you are developing will be in effect for the next decade. Therefore, it is vitally important that, in addition to recognizing the "first responder" role performed by telecommunicators in most of our nation's PSAPs, the classification also take into account the major changes that are occurring in the 911 technology landscape and the profound impact these changes are having on the work performed by 911 professionals. Although not all PSAPs will experience this change uniformly, the focus of public safety telecommunicator recruiting, hiring, and training throughout the next ten years will be on developing a workforce that can take full advantage of the technological capabilities of NG911 to protect and serve the public.

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[13] TFOPA Supp. Report at 55, Sec. 4.11.1.

[14] TFOPA Supp. Report at 58, Sec. 4.11.3.

Thank you for your consideration of our views. If you have questions or would like additional data to assist in your analysis, we would be happy to meet with you to address these issues in greater detail.

Sincerely yours,

David Grey Simpson
Rear Admiral, USN (Ret.)
Chief, Public Safety and Homeland Security Bureau

cc: Joe Heaps, National Institute of Justice, US Department of Justice
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