

# CALIFORNIA PUBLIC UTILITIES COMMISSION

## Communications Division Advice Letter Summary Form

Date AL served on parties: 08/20/2025	CPUC Utility Number U - 7347 - C
Company Name: NGA 911, LLC	<input type="checkbox"/> GRC-LEC <input checked="" type="checkbox"/> URF-Carrier <input type="checkbox"/> CMRS
Address: 8383 Wilshire Boulevard, Suite 800	<input type="checkbox"/> Commission Resolution Requested <input type="checkbox"/> Carrier of Last Resort (See D.96-10-066)
City, State, ZIP: Beverly Hills, CA 90211	AL Tier   I <input type="checkbox"/> II <input checked="" type="checkbox"/> III <input type="checkbox"/>
Filing AL #: AL-19      Requested Effective Date: 09/20/2025	Information-Only <input type="checkbox"/>

	Name:	Email Address:	Phone No.:
Filer	Anita Taff-Rice	anita@icommlaw.com	415-699-7885
Certif.	Anita Taff-Rice	anita@icommlaw.com	415-699-7885

(Name, email address & Phone number are **Required** for "Filer")

**Keyword:** Service Changes    For Contract Keyword, Type:    Government    Other  
 Date Executed \_\_\_\_\_ Contract Total Rev (\$) \_\_\_\_\_

**Subject of filing:** Involuntary Service Discontinuance for NG911 Service in Schedule Cal. P.U.C. 1-T  
 (Service(s) included)

**Authorization for filing:** General Order 96-B  
 (Resolution #, Decision #, etc.)

**Tariff Schedules:** \_\_\_\_\_ **No. of Sheets:** \_\_\_\_\_

**Affected services:** \_\_\_\_\_  
 (Other services affected, pending or replacement AL filings)

**Rate Element(s) affected and % change:** \_\_\_\_\_  
 (Non-recurring and / or recurring)

Customer Notice Required (if so, please attach)

**Notes/Comments:** \_\_\_\_\_  
 (Other information & reference to advice letter, etc.)

<b>File Protest(s) and/or Response(s) to:</b> Advice Letter Coordinator, Communications Division 505 Van Ness Ave., San Francisco, CA 94102 <b>VIA EMAIL ONLY (DO NOT MAIL HARD COPY)</b>	<b>Email to: <a href="mailto:TD.PAL@cpuc.ca.gov">TD. PAL@cpuc.ca.gov</a></b> <b>Protests must be served to the Communications Division (TD. PAL) and the Utility on the same day</b> Refer to GO 96-B 7.4 for additional information
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(FOR CPUC USE ONLY) rev. 12/24/19

(Date Filed / Received Stamp by CPUC Industry Division)	<b>Utility Type:</b> _____  <input type="checkbox"/> <b>Logged In:</b> _____  <input type="checkbox"/> <b>Logged Out:</b> _____	Supv. / Analyst _____ / _____ Due Date to Supv.: _____ CD Suspension Requested: <input type="checkbox"/> Yes, see attached Analyst Completion Date: _____ Supervisor Completion Date: _____ Disposition: <input type="checkbox"/> Accepted <input type="checkbox"/> Withdrawn <input type="checkbox"/> Rejected AL / Tariff Effective Date: _____ Resolution No.: T- _____ Notes: _____
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**iCommLaw®**  
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Facsimile: (925) 274-0988  
anita@icommlaw.com

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August 20, 2025

*Via Electronic Submission*

Telecommunications Division  
California Public Utilities Commission  
505 Van Ness Ave.,  
San Francisco, CA 9410  
TD.\_PAL@cpuc.ca.gov

Re: *Advice Letter 19 – NGA 911, LLC (U 7347 C) Involuntary Service  
Discontinuance for NG911 Service in Schedule Cal. P.U.C. 1-T*

To the PAL Coordinator:

NGA 911, LLC (“NGA 911”) (U 7347 C) hereby submits this Tier II Advice Letter to discontinue service throughout its NG911 service area. On August 20, 2019 California Emergency Services (“Cal OES”) awarded NGA 911 two of four regional contracts to provide Next Generation 911 (“NG911”) service in the Central Region (Contract Number 6060-2019) and the Los Angeles Region (Contract Number 6061-2019). Cal OES requested that NG911 contract awardees incorporate the rates, terms and conditions from the NG911 contract into a tariff to be filed with the California Public Utilities Commission (“Commission”). The Commission responded to the Cal OES request by issuing guidance to carriers that “911 network services and next generation 911 delivery to PSAPs must be tarified in California.”<sup>1</sup>

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<sup>1</sup> Attachment A is a true and correct copy of the Commission’s guidance issued to carriers available at <https://www.cpuc.ca.gov/industries-and-topics/internet-and-phone/information-for->

## **Background**

On September 7, 2022, NGA 911 submitted Advice Letter 14 to the Commission setting forth the rates, terms and conditions of providing NG911 service to Cal OES. The Commission approved the tariff on October 19, 2022. The NG911 contract with Cal OES expired on August 19, 2024, and since that time, Cal OES has purchased NG911 service solely from NGA 911's tariff.<sup>2</sup> To be clear, the Cal OES contract was not an individual case basis ("ICB") deviation from NGA 911's tariff; rather the tariff codified the exact terms of the contract in the form of a tariff. Thus, any substantive change to the NG911 services provided by NGA 911 to Cal OES necessarily requires a tariff modification, and this advice letter is required.

The NG911 upgrade required a multi-year installation effort, and the new IP-based network was to run alongside the legacy TDM network until a full cutover occurred. NGA 911 has completed its IP-based NG911 network and is currently carrying 911 traffic to 13 Public Safety Answering Points ("PSAPs") and providing ANI/ALI services to 190 PSAPs which are interconnected on an ESInet.<sup>3</sup> NGA 911's Central and Los Angeles Regions NG911 Networks are connected to the State's NG911 Network(s), tested and ready for OSP Migrations. A timeline for the migration is dependent upon Cal OES's removal of the "Project Hold" status that has been in place for over a year.

Cal OES, however, notified NGA 911 in June 2025<sup>4</sup> that Cal OES intends

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telecommunications-applicants-and-registrants-in-california/911-guideline.

<sup>2</sup> Attachment H is a true and correct copy of the email with CalOES reflecting its request to transition invoicing from NGA 911 from "contract" to "utility tariff".

<sup>3</sup> The ESInet is the backbone of the Next Generation 911 system.

<sup>4</sup> Attachment B is a true and correct copy of the letter received from CalOES dated June 20, 2025.

to dismantle the Regional NG911 networks deployed and transition to a Single Statewide NG911 provider. Until a new RFP is issued to build a secondary (back-up) Statewide NG 911 network, the outage-prone and technically antiquated legacy TDM 911 Network will remain in use. These decision to decommission the regional NG911 networks will results in delays and likely increased number of 911 outages as a new NG911 network is built by a single source provider despite the existing NG911 networks being built, integrated, tested and turned up.

Cal OES retained a contractor to develop a plan to decommission the NG911 network, and that contractor instructed NGA 911 to prepare a decommissioning plan. The first step of the plan is for NGA 911 to decommission NG911 circuits (which currently provide redundancy) “leaving only one (1) circuit to deliver location services.”<sup>5</sup> Decommissioning the NG911 circuits, then, will result in NGA 911 discontinuing service to PSAP locations throughout its service region, leaving no redundant circuits, which likely will lead to outages if the antiquated 911 networks experiences a failure.

As the Commission has consistently held that 911 services are critical to the safety and well-being of all Californians, and the Cal OES directions to NGA 911 will result in the withdrawal of a critical element of public safety, NGA 911 is providing sufficient information in this advice letter to ensure the Commission is fully informed about NGA 911’s involuntary discontinuance of service and the resulting negative impact on public safety.

Legacy 911 infrastructure depended on outdated trunking technology, which

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<sup>5</sup> Attachment C is a true and correct copy of an email from the CalOES contractor to NGA 911.

is limited to a one-to-one call ratio. This design results in busy signals during peak emergency call volumes. By contrast, NG911 systems are scalable and capable of handling a substantially higher volume of concurrent calls, ensuring uninterrupted access to emergency services.

The real-world weaknesses of the legacy 911 systems are well documented. Frontier Communications still has a legacy 911 network in use in Coachella Valley. There have been 15 documented 911 outages in Coachella Valley since August 2023.<sup>6</sup> These outages have resulted in delayed or lost 911 calls, directly reducing the responsiveness and effectiveness of emergency services, and in several instances, PSAPs were unaware of outages for extended periods, preventing timely mitigation strategies such as rerouting or manual intervention. NG911 services, as designed for California, by contrast provide direct visibility into 911 traffic and have 24 x 7 x 365 monitoring and integrated redundancy across the Regional Vendors and Prime Vendor NG911 networks providing real time failover capability within the NG911 network.<sup>7</sup>

911 outages are not isolated to Frontier's more rural areas. Cal OES' data indicates that the legacy 911 network suffered 16 network outages per month, for an average 263 hours per month during which 911 service was unavailable for Californians attempting to get emergency service.<sup>8</sup> Equally important, 50 percent of legacy 911 calls arrive at PSAPs without location information, which significantly

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<sup>6</sup> NGA 911 compiled Attachment D listing the Frontier 911 outages based on publicly available information and press reports.

<sup>7</sup> Attachment E is a true and correct excerpt from a Cal OES presentation on NG911 capabilities.

<sup>8</sup> Attachment F is a true and correct copy of an excerpt of a CalOES presentation on weaknesses of the legacy 911 system.

hampers the PSAPs' ability to determine which first responder to contact and the correct dispatch location to get help to the caller. Even when legacy 911 systems can provide location data, Cal OES data shows that there were 19 outages of legacy location systems per month, resulting in an average of 145 hours of location system outages with legacy 911 networks.<sup>9</sup>

### **Basis For Submitting Advice Letter Notice of Service Discontinuance**

The Commission's guidance to carriers providing NG911 service stated that 911 tariffs are subject to all requirements of General Order 96-B and associated Commission orders. Rule 1.16 of the Telecommunications Industry Rules in GO 96-B defines a withdrawal of service as "discontinuing a service's availability to all customers, including those customers receiving the service as of the date it is withdrawn." Cal OES is the only customer receiving NG911 service from NGA 911's tariff, and the tariff codifies the Cal OES contract. NGA 911 is being directed to take steps that will alter the terms of its NG911 tariff, in a way that results in a withdrawal of NG911 service to the existing customer, thus this advice letter approval is necessary.

No Commission order requires or authorizes NGA 911 to withdraw its NG911 service, therefore an advice letter (or possibly an application is required). In its guidance to NG911 providers, the Commission stated that "providing access to emergency services to end users is a required component of basic service for landline providers."<sup>10</sup> Telecommunications Industry Rule 8.6 requires that an application be

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<sup>9</sup> Attachment G is a true and correct copy of an excerpt of a CalOES presentation providing data on legacy 911 location system outages.

<sup>10</sup> See Attachment A.

filed with the Commission requesting permission to withdraw a basic service.

However, NGA 911 provides service to Cal OES and PSAPs, not end users, so it appears that a Tier 2 advice letter in this matter may be appropriate. NGA 911 stands ready to file a formal application for withdrawal of its NG911 service if directed by staff.

If staff deems a Tier 2 advice letter to be appropriate, Telecom Industry Rule 3 and 3.2 require 30-day notices be sent to affected customers. NGA 911 is providing a draft customer notice to Cal OES with this advice letter.<sup>11</sup>

NGA 911 submits that the importance of a modern, robust NG911 system is of vital importance to all Californians and asks that staff take into account the risks of relying solely on a Single Statewide NG911 provider or the legacy 911 system before deciding whether NGA 911 may withdraw its NG911 service, as directed by Cal OES.

### **Protests**

Copies of this Advice Letter were served on the Commission's Advice Letter Service list maintained on its website. Additionally, the Advice Letter will be made available to any interested party who contacts the undersigned at the address above. Anyone may protest this Advice Letter within 20 days. Any protest must set forth the specific grounds on which it is based, must be made in writing, and must be timely filed with the Commission.

The address for mailing and delivering a protest to the Commission is:

Director, Communications Division  
Communications Division – Advice Letter Coordinator  
California Public Utilities Commission

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<sup>11</sup> See Attachment I.

505 Van Ness Avenue, Room 3203  
San Francisco, CA 94102

A copy of any protest must be mailed to NGA 911, LLC on the same date as it is mailed or delivered to the Commission. The addresses for mailing or delivering a protest to the company are as follows:

iCommLaw  
ANITA TAFF-RICE  
1547 PALOS VERDES, # 298  
WALNUT CREEK, CA 94597  
anita@icommlaw.com

NGA 911, LLC  
MICHELLE BLAND  
8383 WILSHIRE BLVD, SUITE 800  
BEVERLY HILLS, 90211  
michelle@nga911.com

Please contact us if there are any questions regarding this advice letter.

Sincerely,

A handwritten signature in cursive script that reads "Anita Taff-Rice". The signature is written in black ink and is positioned above a thin horizontal line.

*Counsel for NGA 911, LLC*

## **ATTACHMENT A**



Search example: How can I reduce my bill?

SEARCH

[Home](#) > [Industries and Topics](#) > [Internet and Phone](#) > [Information for Telecommunications Applicants and Registrants in California](#) > [NG 911 Provider Guideline](#)

## Guidance for Communications Service Providers who are now providing or plan to offer Next Generation 9-1-1 Services in California.

### 911 Service Providers Must be CPCN Holders

Service providers/carriers who provide 9-1-1 network services, regardless of whether or not those services are IP-based, must be CPCN holders. Providing access to emergency services to end users is a required component of basic service for landline providers. Wireless carriers and VoIP providers are also required to provide their end users with the ability to access and complete 9-1-1 calls.

- Additional information regarding CPCN authority can be found here: <https://www.cpuc.ca.gov/regulatory-services/licensing/information-for-telecommunications-applicants-and-registrants-in-california>
- D. 12-12-038** - The current definition of basic service requires that customers be provided free and unlimited access to emergency 911/E911 services. Having access to emergency services is essential for all consumers. Accordingly, the existing standards for basic service standards and requirements for access to 911/E911 services shall continue to apply.
- D.06-03-013** - In revising General Order (G.O.) 168, the Commission extended the 9-1-1 requirements to wireless carriers, as well as unequivocally recommitted to public safety and recognized the importance of our 9-1-1 system to public safety.

### CPCN Holders Must Tariff 911 Services

9-1-1 network services and next generation 911 delivery to PSAPs must be tarified in California. For filing tariffs, carriers should use Telecommunications Industry Rule 8.3 for new services or Telecommunications Industry Rule 8.4 for changes to tarified rates, charges, terms, or conditions. These

9-1-1 network services filings are appropriate for a Tier 1 Advice Letter.

- D.07-09-018** - The Commission specifically excluded 9-1-1 services from de-tariffing. Additionally, the 9-1-1 system should not be de-tariffed because it provides an important public service that must be available to all phone customers.
- D. 13-07-019** - The Commission reaffirmed its policy that 9-1-1 and other emergency services should remain tarified. Further, the Commission stated that related rates and charges should remain cost-based, as previously stated in Resolution T-14043.
- G.O. 96B, General Rule 5.** - The primary use of the advice letter process is to review a utility's request to either change its tariffs in a manner previously authorized by statute or Commission order, to conform their tariffs to the requirements of a current statute or Commission order, or to get Commission authorization to deviate from its tariffs.

### 9-1-1 Network Service Tariffs Must Include Pricing Information

Carriers who currently provide 9-1-1 network services and have published tariffs without pricing information are instructed to file Tier 1 advice letters with the updated information on their service offerings, which include pricing. 9-1-1 tariffs should be cost-based.

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#### HOW CAN WE HELP?

Emergency? Call 911

File a Complaint

Late Bill Assistance

Power Outage Map

Are you in a high fire-threat area?

Financial Assistance

Consumer Programs and Services

Electric Rate Comparison Website

Website Feedback

## **ATTACHMENT B**



June 20, 2025

Don Ferguson  
CEO  
NGA 911, LLC  
8383 Wilshire Blvd, Suite #800  
Beverly Hills, CA 90211

Subject: Follow Up

Thank you for the continuing partnership and discussions, particularly the conversations this week. As discussed, we have been assessing the best contract and deployment strategy moving forward. We are reframing the architecture and operations of the project to a statewide architecture, rather than the current regionalized approach. This will require a thoughtful transition with your participation. We will develop and execute a transition plan over roughly the next six months. Together, we will design a transition that supports the 911 system and considers impacts to your organization.

As you know, the Governor's Office of Emergency Services (Cal OES) paused the migration of additional Public Safety Answering Points (PSAPs) to allow us the time to better understand the PSAPs experiences and identify opportunities to improve and ease the migration of future PSAPs. Through those conversations with the PSAPs and vendor partners, we've concluded that there are actions we must take to improve the project.

Together, Cal OES and our vendor partners have worked to transition California from the legacy 911 system to the NG 911 network. We have accomplished much, including the installation of necessary infrastructure across the state, structural changes at many PSAPs, installation of circuits, and establishment of NG 911 core services. To date, we've migrated 23 PSAPs to the NG 911 network.

We know that you share our commitment to public safety, and we are confident that we will continue to work as partners. To be clear, this transition is



3650 SCHRIEVER AVENUE, MATHER, CA 95655  
(916) 845-8506 TELEPHONE (916) 845-8511 FAX  
[www.CalOES.ca.gov](http://www.CalOES.ca.gov)

Don Ferguson  
June 20, 2025  
Page 2

to improve the design Cal OES previously established for NG 911. Furthermore, this transition is not a reflection of vendor performance and does not impact any existing contractual arrangements you may have or future procurements with the State of California. You continue to be eligible to compete in future procurements for NG 911 services.

Thank you for your continued partnership and we look forward to more discussions.

Sincerely,



LISA MANGAT  
Chief Deputy Director

c: Barb Winn, Chief Growth Officer

## ATTACHMENT C

----- Forwarded message -----

From: **Bivens, Jason (Contractor)@CalOES** <[ContractorJason.Bivens@caloes.ca.gov](mailto:ContractorJason.Bivens@caloes.ca.gov)>

Date: Wed, Jul 16, 2025 at 8:38 AM

Subject: NGA Transition Follow-up

To: barbara.winn <[barbara.winn@nga911.com](mailto:barbara.winn@nga911.com)>, don <[don@nga911.com](mailto:don@nga911.com)>, jennifer <[jennifer@nga911.com](mailto:jennifer@nga911.com)>, [howard.tien@nga911.com](mailto:howard.tien@nga911.com) <[howard.tien@nga911.com](mailto:howard.tien@nga911.com)>, Emily Klahn <[emily.klahn@nga911.com](mailto:emily.klahn@nga911.com)>

Cc: Russ Nichols <[russ.nichols@thehsg.com](mailto:russ.nichols@thehsg.com)>, Sunahara, Ryan@CalOES <[Ryan.Sunahara@caloes.ca.gov](mailto:Ryan.Sunahara@caloes.ca.gov)>, Troxel, Paul@CalOES <[Paul.Troxel@caloes.ca.gov](mailto:Paul.Troxel@caloes.ca.gov)>, Karen Liddick <[karen.liddick@911authority.com](mailto:karen.liddick@911authority.com)>, Miriam Brown <[miriam.brown@911authority.com](mailto:miriam.brown@911authority.com)>, Joel McCamley <[joel@911authority.com](mailto:joel@911authority.com)>, Jones, Donald@CalOES <[Donald.Jones@caloes.ca.gov](mailto:Donald.Jones@caloes.ca.gov)>, Jim Lockard <[jim.lockard@911authority.com](mailto:jim.lockard@911authority.com)>, Mattson, Andrew@CalOES <[Andrew.Mattson@caloes.ca.gov](mailto:Andrew.Mattson@caloes.ca.gov)>

Good Morning,

Please see the below expectations, project requirements, and initial timeline start. We look forward to meeting with your team.

**Cal OES expectations of RNSPs:**

- Continue supporting live PSAPs during the transition period.
- OES proposes a transfer of ownership of the below at each PSAP:

- Rack
- All Equipment contained in each rack, except leased equipment.
- Actively participate in planning sessions with the statewide network provider and Cal OES.
- Do not renew or extend any circuit contracts without the concurrence/approval of Cal OES.
- PSAPs that are not transitioned for Voice service and have 2+ circuits:
  - Prepare a decommission plan for approval by Cal OES before decommissioning any circuit.
  - Decommission circuits, leaving only one (1) circuit to deliver location services.

**Project Requirements:**

- RNSP Resources to facilitate the transition of voice services **(Light Effort)**
- RNSP Resources to facilitate the transition of ALI services **(Light Effort)**
- Identify the Project Team for each of the two efforts

**Timeline**

- Preplanning: 7/16/25

JB

Jason Bivens, ENP  
443-900-2237 (Mobile)

## **ATTACHMENT D**

This Advice Letter is submitted to the California Public Utilities Commission (CPUC) to document recent and recurring 911 service outages across the state, particularly involving AT&T and Frontier. These events underscore the urgent need for resilient, redundant infrastructure such as Next Generation 911 (NG911), and raise serious public safety concerns regarding the dismantling of such systems.

Date	Location	Provider(s)	Cause	Impact
Feb 22, 2024	Statewide (including California)	AT&T	Server update issue	Millions unable to reach 911; SOS features failed; FCC launched investigation
July 22–23, 2025	Santa Barbara & San Luis Obispo Counties	Frontier, Verizon, AT&T	Fiber cut by third-party construction	911 dispatch unavailable; airport ground stop in Santa Barbara
Jan 10, 2025	Palm Springs, Cathedral City, Indio	Frontier	Unknown / systemic	Fifth outage since Aug 2023; 911 system failed across cities at ~8:30 PM
June 9, 2025	Indio	Frontier	Unknown / unidentified	City facility lines down; public advised to use backup number
July 24, 2025	Coachella Valley (Palm Springs area)	Frontier	Repeated infrastructure failure	15th outage since Aug 2023; 911 dispatch unaware of outage for 2 hours

These incidents reveal systemic weaknesses in legacy infrastructure and the failure of existing providers to ensure consistent and reliable access to emergency services. The dismantling of NG911 capabilities further reduces redundancy and scalability, placing Californians at risk during emergencies. The CPUC is urged to take immediate regulatory action to ensure continuity of service and to preserve NG911 infrastructure as a critical public safety asset.

## **ATTACHMENT E**



## Next Gen 9-1-1 Transition What Does the Dotted Line Mean?

1. PSAP Remediation is completed.
2. Atos and Region have installed equipment.
3. Majority of IP circuits are installed.
4. CPE is connected to the Atos router handoff.
5. Acceptance Test Plan has been completed.
  - i. Validate can receive test 9-1-1 calls and failover scenarios.
  - ii. Validate \*code transfers (means \*code is mapped to a URI).
6. PSAPs in the Transfer Cluster have completed steps 1-5.
7. PSAP is then ready to "Go Live".

Note: URI stands for **Uniform Resource Identifier**, and it's the official name for those things you see all the time on the Web that begin 'http: ' or 'mailto: ', for example <http://www.w3.org/>



## NG9-1-1 System Monitoring

- In today's environment, we have no direct visibility into the 9-1-1 system
  - We are dependent on carriers for outage information
- The NG9-1-1 system will be monitored 24/7/365 via PNSP/RNSP
- The Prime and all Regions will provide a dashboard for Cal OES to monitor the health and stats for end-to-end state NG9-1-1 system
- Dashboard may be available to PSAPs to provide increased situational awareness
- eBonding trouble tickets enables PSAPs to have a single point of contact.

## **ATTACHMENT F**



## Item 5-2: Cloud Based CPE Update

- Contracts were signed in July 2020
- Original plan was to wait for NG 9-1-1 deployment before starting Cloud CPE deployment
- NG 9-1-1 deployment schedule and NENA i3 compliant CPE challenges have changed priorities
- Cloud CPE contracts have been updated to interface with legacy 9-1-1, meaning Cloud CPE can be installed in your PSAP before NG 9-1-1 transition is completed!

February 23, 2022

California State 9-1-1 Advisory Board

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## Network Outage Summary

### 9-1-1 Network Outages:

- An average of 16 outages per month
- An average of 263 hours per month
  - Someone who needed help might not have been able to reach 9-1-1

**Next Gen 9-1-1 will dramatically reduce these outages**

March 2020

14

## **ATTACHMENT G**



## Location Outage Summary

### Automatic Number Information and Automatic Location Information (ANI/ALI) outages

- An average of 19 outages per month
- An average of 145 hours per month where location data was not available
- About 50% of all 9-1-1 calls arrive without location information
- When location information is not available, valuable time is lost asking where the 9-1-1 caller is located

### **Next Gen 9-1-1 increases location accuracy**

March 2020

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## **ATTACHMENT H**



Don Ferguson &lt;don@nga911.com&gt;

**Fwd: FW: Contracts 60602019 & 60612019**

5 messages

Ishka Villa &lt;ishka@nga911.com&gt;

Wed, Sep 11, 2024 at 3:22 PM

To: Don Ferguson &lt;don@nga911.com&gt;

Cc: Michelle Bland &lt;michelle@nga911.com&gt;, Barbara Winn &lt;barb.winn@nga911.com&gt;

Hi Team,

The State Controller's Office (SCO) began processing our August invoices on September 5, 2024.

They requested that CALOES ask NGA to revise the invoices due to our transition from a **contract to a utility tariff**.

Please note that CALOES will be resubmitting the invoices, which have already been marked up by the SCO. There should be no significant delays. We received this request this morning and completed the revisions within approximately 4 hours.

I wanted to ensure you're all aware of this change requested by the State Controller's Office.

Thanks,

**Ishka Villa**

Chief Financial Officer

NGA 911, LLC

+ 1 (310) 721-3723

[ishka@nga911.com](mailto:ishka@nga911.com)[www.nga911.com](http://www.nga911.com)

----- Forwarded message -----

From: **Mortensen, Deirdre@CalOES** <[Deirdre.Mortensen@caloes.ca.gov](mailto:Deirdre.Mortensen@caloes.ca.gov)>

Date: Wed, Sep 11, 2024 at 9:22 AM

Subject: FW: Contracts 60602019 &amp; 60612019

To: Rose Pabillar <[rose.pabillar@nga911.com](mailto:rose.pabillar@nga911.com)>, Ishka Villa <[ishka@nga911.com](mailto:ishka@nga911.com)>Cc: Doukakos, Theodore@CalOES <[Theodore.Doukakos@caloes.ca.gov](mailto:Theodore.Doukakos@caloes.ca.gov)>, Howard, Tiffany@CalOES <[Tiffany.Howard@caloes.ca.gov](mailto:Tiffany.Howard@caloes.ca.gov)>, Sweeney, Nicole@CalOES <[Nicole.Sweeney@caloes.ca.gov](mailto:Nicole.Sweeney@caloes.ca.gov)>

Good morning Rose and Ishka,

As our Next Gen contracts ended 8/19, we are required to have the attached invoices modified to reflect the service period from 8-1 through 8/19 in order for SCO to process them. Going forward, do not reference the PO/contract number, but instead mark them 'utility tariff'.

From: Doukakos, Theodore@CalOES <[Theodore.Doukakos@CalOES.ca.gov](mailto:Theodore.Doukakos@CalOES.ca.gov)>

Sent: Wednesday, September 11, 2024 9:03 AM

To: Mortensen, Deirdre@CalOES <[Deirdre.Mortensen@CalOES.ca.gov](mailto:Deirdre.Mortensen@CalOES.ca.gov)>

Subject: FW: Contracts 60602019 &amp; 60612019

Good Morning Deirdre!

Could you please ask NGA to change the dates of service listed on these to 8/1 – 8/19?

Josh spoke to SCO, and they will allow us to charge these to the encumbrances, as long as the end date for service matches the end date of the contract.

Then going forward after this batch, all invoices will be coded to tariff.

Thank you!

Theo

## ATTACHMENT I



**NGA 911, LLC (NGA)**

**Customer Notice**

**Subject: Discontinuance of NG911 Service under Schedule Cal. P.U.C. 1-T**

**Date:** August 20, 2025

Dear California Governor's Office of Emergency Services (Cal OES),

This notice is to inform you that NGA 911, LLC (U 7347 C) has submitted Advice Letter 19 to the California Public Utilities Commission (CPUC) seeking approval to discontinue certain NG911 services provided under NGA 911's Schedule Cal. P.U.C. 1-T.

**What is changing:**

NGA 911 will be discontinuing NG911 service in portions of the Central and Los Angeles Regions where NG911 circuits are currently in place. Cal OES has directed NGA 911 to decommission regional NG911 networks and transition to a single statewide NG911 provider. As part of this process, NGA 911 must withdraw its tariffed NG911 service.

**Why this change is happening:**

Cal OES notified NGA 911 in June 2025 that it intends to dismantle the regional NG911 networks and migrate to a single statewide NG911 system. NGA 911 is required to comply with these directions, which result in the withdrawal of NGA 911's existing NG911 service.

**When it takes effect:**

The withdrawal of service will occur no earlier than 30 days from the date of this notice, subject to CPUC review and approval of Advice Letter 19.

**What this means for you:**

This service discontinuance will remove NG911 circuit redundancy currently supporting PSAP locations in the Central and Los Angeles Regions. This may increase reliance on the legacy 911 TDM network until a new statewide NG911 system is established.



**Additional Information:**

NGA 911 filed Advice Letter 19 on August 19, 2025, consistent with CPUC General Order 96-B requirements. Protests or responses to this Advice Letter must be submitted to the CPUC within 20 days of the filing date.

If you have any questions, please contact us at:

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NOTE: If you want to be removed from a list, please send an email to: [telcoadviceletterservice@cpuc.ca.gov](mailto:telcoadviceletterservice@cpuc.ca.gov)

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