



August 26, 2025

**VIA E-MAIL ONLY:**

Donald Ferguson  
Don@nga911.com  
8383 Wilshire Blvd., Suite 800  
Beverly Hills, CA 90211

Re: Notice of Rejection of Corrective Action Plan

Dear Donald Ferguson,

This letter serves as the California Governor's Office of Emergency Services' (Cal OES) received NGA 911, LLC's (NGA) revised corrective action plan on August 21, 2025. This letter serves as notice that Cal OES is partially accepting and partially rejecting NGA's revised corrective action plan.

Cal OES accepts NGA's plan to correct three of the five issues raised in the problem notification letter dated August 1, 2025. Cal OES requires a supplemental revised corrective action plan addressing two remaining issues. Please be aware that if NGA fails to provide agreeable supplemental corrective action plan, the revised corrective action plan that was submitted on August 21, 2025, will be deemed rejected. However, if NGA provides agreeable supplemental corrective action plan, Cal OES will review the information further to assess whether, when taken together, the revised correction action plan and the supplemental corrective action plan can be accepted.

With respect to Technical Requirement 21.2.20, which requires any CPE system failure with an active operation component to result in no loss of service or capability, NGA provided no plan to correct the issue but asked for clarification of the problem. Cal OES clarifies that the issue of concern is that positions were crashing. While the revised corrective action plan does address the issue of positions crashing at page 8, the plan only notes that computer updates appear to have corrected the issue. The plan is deficient because there is neither an identification of the cause of the underlying issue, nor an explanation of how an update resolved the issue.



3650 SCHRIEVER AVENUE, MATHER, CA 95655  
(916) 845-8506 TELEPHONE (916) 845-8511 FAX

[www.CalOES.ca.gov](http://www.CalOES.ca.gov)

Cal OES requests a clear assessment of the problem and evidence that the issue has been, or will be, corrected.

With respect to Technical Requirement 21.2.25, which requires the CPE to provide abandoned call detail, NGA requested clarification of Cal OES' concerns. Cal OES clarifies that any call that makes it past the designated demarcation point is required to present as an abandoned call. For i3 calls, that is any call that makes it past the final Next Gen Service Provider's router. For CAMA calls, that is any call that makes it to the CHS provider's gateway. Please provide information that explains how NGA will correct these issues.

With respect to Technical Requirements 21.2.29, 21.2.33, and 21.2.35, Cal OES accepts NGA's revised corrective action plan, and the timelines stated therein. Cal OES expects that lab validation will be completed in accord with the timelines noted by NGA. It is important that Cal OES be informed if NGA anticipates being unable to meet the timelines. Should NGA need to request an extension of any timeline noted in the revised corrective action plan, please submit a request in writing, including the reasons that additional time is needed, before the deadline.

In light of the clarifications stated herein, please provide a supplemental corrective action plan addressing Technical Requirements 21.2.20 and 321.2.25 within three (3) State business days after this notification. As noted, failure to provide a supplemental corrective action plan will result in the entire corrective action being rejected.

Cal OES appreciates NGA efforts to work towards a resolution of these issues. However, failure to submit an acceptable supplemental corrective action plan within three (3) State business days or meet agreed upon deadlines may result in Cal OES taking additional action, including, but not limited to, canceling all pending orders from PSAPs, seeking credits on behalf of the impacted PSAPs, or terminating the contract.

If you have any questions regarding this notice, you may contact me at [paul.troxel@caloes.ca.gov](mailto:paul.troxel@caloes.ca.gov) or (916) 894-5017.

Sincerely,



Paul E. Troxel, ENP  
9-1-1 Emergency Communications Branch Manager