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May 5, 2008

Renee J. Jenkins, Secretary
Public Utilities Commission of Ohio
180 East Broad Street, 13th Floor
Columbus, Ohio 43215-3793

Re: Case No. 08-287-TP-UNC; Petition filed by Ohio NENA/APCO Requesting Rules and Standards Governing Next Generation 9-1-1 in a Competitive 9-1-1 Market.

Dear Ms. Jenkins:

The Ohio Chapters of the National Emergency Number Association (NENA) and the Association of Public-Safety Communications Officials International (APCO) have reviewed the recent comments filed by Cincinnati Bell on April 4, 2008 and AT&T Ohio on April 16, 2008 respectively. Their filings represented the same thinly veiled obstructionist comments and observations consistent with protecting their corporate interest over that of the public's safety. Offering no solutions of their own, or real support for progress and innovation, the petitioners would prefer instead to seek delays that would prevent critical testing and validation of new technologies that could save lives. Even the National Emergency Number Association (NENA), whom the petitioners quoted so liberally, stated in their April 29, 2008 comments "the evolution to an NG9-1-1 system should be treated as a national project in which individual state action is necessary" and "while national and international technical and operational standards for NG9-1-1 are still in progress, and much work needs to be done to complete this critical work, many activities can and should be undertaken at the state and local levels to prepare".

The Ohio Associations of NENA/APCO reaffirm our original comments and requests and those filed by Intrado on April 18, 2008. Contrary to the comments of Cincinnati Bell and AT&T Ohio, there is an urgent need for the Commission to address issues related to the next generation of 9-1-1 and competitive service. NENA/APCO is also in total disagreement with the process suggested by Cincinnati Bell and instead would encourage the Commission to continue to exercise a leadership role on an accelerated basis. Specifically we respectfully ask that the Commission begin proceedings to:


- Institute a rule making procedure beginning with a workshop that Commission staff can oversee and participate in.
- Establish goals and time frames for completion of the workshop.

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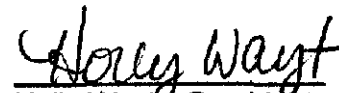
- Issue proposed rules and standards within 3 months following establishment of the rule making procedure.

Ohio's 9-1-1 system is outdated and fails to meet the public's expectations. The Ohio Associations of NENA/APCO believe that Ohio has an opportunity to show real leadership by working through the regulatory issues that will accelerate Ohio's ability to migrate to the next generation of 9-1-1 technology.

Respectfully submitted:


Kim Brandt – President
Ohio Chapter NENA

Respectfully submitted:


Holly Wayt – President
Ohio Chapter APCO