**BEFORE**

**THE PUBLIC UTILITIES COMMISSION OF OHIO**

**In the Matter of the Application of Intrado )**

**Communications Inc. to Provide Competitive ) Case No. 07-1199-TP-ACE**

**Local Exchange Services in the State of Ohio. )**

 **)**

**AFFIDAVIT OF LT. COL. CINDY M. COMBS**

**IN SUPPORT OF**

**MOTION TO INTERVENE**

**OF**

**CITY OF CINCINNATI**

STATE OF OHIO )

 ) ss:

COUNTY OF HAMILTON )

I, Cindy M. Combs, being first duly cautioned and sworn, depose and state as follows:

1. I am an Assistant Police Chief with the City of Cincinnati Police Department.
2. I currently serve as the Information Management Bureau Commander, having responsibility for the Police Communications Section, which serves as the Public Safety Answering Point (PSAP) for the City of Cincinnati.
3. Police Department Employees answer all incoming 9-1-1 calls for the City of Cincinnati.
4. I have held the position of Assistant Police Chief since 2001 and have had responsibility for PSAP oversight during my entire tenure. Prior to my promotion, I served as the Police Communications Section Commander at the rank of Captain for nearly two years.
5. As indicated in Mr. Ronald W. Bien's affidavit, he serves as the 9-1-1 Coordinator for the Hamilton County Communications Center, one of four PSAPs serving Hamilton County. Besides the City of Cincinnati PSAP, the remaining PSAPs are the City of Norwood Communications and Amberley Village Public Safety.
6. Since the filing of Mr. Bien's Affidavit, I have had conversations with Chief Jack Monahan, representing Amberley Village PSAP, and Lieutenant Tom Williams, representing Norwood PSAP. I have reviewed the following testimony with each of them, and each has agreed that this represents our joint response.
7. Mr. Bien was accurate when he indicated that over the past year Hamilton County Communications staff and Intrado personnel have made contact with members of the additional three PSAPs within Hamilton County. Hamilton County Communications Center has been working with Intrado for well over a year.
8. Those representing the remaining PSAPs are concerned that it was not until Hamilton County Communications Center needed our support and cooperation that we were contacted to participate in the "pilot project" with Intrado.
9. During those discussions, Cincinnati asked Intrado to provide White Papers regarding their service proposal, which their local account representative, Mr. Chris Robbins, originally agreed to produce, later recanting that none existed.
10. The opinion of those Mr. Bien cited as having conversations with in his Affidavit is that information provided during those meetings was orchestrated to be limited to further the goals of the Hamilton County Communications Center. Conversations he indicated having with each of us were not fully and accurately reported in his Affidavit.
11. Mr. Bien met with me and two Police Captains under my command on June 3, 2008.
12. At that meeting, we indicated that we were interested in seeing technological advances regarding 9-1-1 service. We also indicated we were pleased with our current service provider and were confident that they were likewise working on a solution to provide the same services Intrado proposed. We advised Mr. Bien that we had been contacted by other vendors working on similar solutions and selecting one vendor to work with on what was more appropriately referred to as a "proof of concept" was not something we were interested in.
13. At no time did we indicate that we "would simply prefer to wait until the Hamilton County Department of Communications has completed the testing and validation process before making this determination" - that being to change the Final Plan.
14. On behalf of the three other PSAPs serving Hamilton County, we are concerned that the PUCO will interpret this statement to mean that we will all agree to use Intrado if the Intrado technology is proven. That simply is not the case.
15. We do not feel any one PSAP should be able to impose its choice of service provider onto any other PSAP. We agree that Hamilton County Communications Center should be allowed to proceed with their testing, but in a way that does not require other PSAPs in our county to follow suit with their preferred vendor should their product prove viable before we have the ability to view other vendor's offerings.

Further, Affiant sayeth naught.

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Lt. Col. Cindy M. Combs

Assistant Police Chief

City of Cincinnati Police Department