

**STATE OF ILLINOIS**

**DEPARTMENT OF STATE POLICE**

**Fulton County ETSB**

:

:

**Case No. 23-M-373**

:

**Application for 9-1-1 Modification Plan**

**ORDER OF THE STATEWIDE 9-1-1 ADMINISTRATOR**

**I. Introduction**

On November 15, 2023, the Fulton County ETSB (“Applicant”) filed a Modification Plan with the Illinois State Police (“Department”) pursuant to 83 Ill. Admin. Code 1325 “Standards of Service Applicable to 9-1-1 Emergency Systems” (“Part 1325”). Applicant seeks authorization to implement an NG9-1-1 System serving Fulton County.

The Fulton County ETSB supported the Plan with documentary materials, including a narrative statement explaining the purpose for modifying the Petitioner’s existing 9-1-1 plan and a network diagram.

The Office of the 9-1-1 Administrator is authorized to coordinate the implementation of systems established under the ETSA. In order to secure compliance with the technical and operational standards for the development of local agency systems, the ETSA empowers the Statewide 9-1-1 Administrator to approve or disapprove plans submitted by the public agencies. Standards of service applicable to 9-1-1 emergency systems, as adopted by the Department, are set forth in 83 Ill. Adm. Code Part 1325.

**II. Description of Applicant**

Applicant operates the 9-1-1 emergency services program for Fulton County. The Illinois Commerce Commission (“Commission”) approved Applicant’s 9-1-1 system in Docket No. 95-0591.

The system became operational in July 1997 and operates with two primary Public Safety Answering Points located at 288 West Washington Street, Lewistown, Illinois 61542 and 2 North Main Street, Canton, Illinois 61520. The 9-1-1 system dispatches police, fire, and ambulance services.

**III. Purpose and Description of Proposed Modification**

Applicant is requesting to transition to the statewide AT&T NG9-1-1 System.

AT&T’s ESInet solution is a combination of their IP network and Next Gen Core Services (NGCS) components that includes industry leading SLAs, management services and tools to help ensure that they provide the best possible service. The design is based on building redundant systems to avoid any single point of failure (SPOF) in the ESInet and the overall NG9-1-1 Network Architecture. The

NG9-1-1 system will provide flexibility in the routing of calls. The ESInet being deployed has all PSAPs connected and can route calls based on not only location, but also by availability. In the Next Generation solution, a call will be answered through intelligent routing. Additionally, there will be more available positions to answer calls because all connected and tested PSAPs will be technically able to answer the call and will be able to dispatch or transfer the call to another PSAP.

AT&T's ESInet provides six (6) geographically diverse and fully redundant facilities to increase resiliency and survivability in natural and man-made disaster scenarios, with scalable capacity capable of supporting more than twice the 9-1-1 busy hour call for the entire United States. AT&T has documented business continuity and restoration plans, including complex disaster and evacuation contingencies. The 24x7 operations center employs an Incident Handling process modeled on FEMA's Incident Command System, with notifications built into the process.

AT&T will interconnect to Legacy Selective Routers to transfer and/or receive calls with Automatic Number Identification (ANI) and Automatic Location Identification (ALI) information to the State's NGCS via legacy means through the Legacy Selective Router Gateway (LSRG). Interconnections will also allow legacy PSAPs served by legacy selective routers to serve as the abandonment route for PSAPs served by the AT&T ESInet solution.

Connectivity extends beyond the internal ESInet transport to external network and OSP interfaces. The ESInet supports both TDM and IP OSP ingress at geographically distributed Points of Interconnection (POI's). The ESInet supports standards-based protocol interfaces to external ESInets for call hand-off and call transfers. With pre-established connectivity capabilities, PSAPs on the ESInet have the ability to transfer calls to PSAPs on other ESInets or PSAPs that have not yet transitioned off legacy selective routers.

The ESInet is monitored 24x7x365 from a NOC with tier 2 and tier 3 technical resources dedicated to the AT&T ESInet. AT&T's 9-1-1 Resolution Center has dedicated public safety resources.

The PSAPs back each other up. No alternate routing was identified.

Fulton County does not accept Text-to-911. Fulton County will be required to implement an integrated Text to 911 solution by July 1, 2024.

On November 21, 2023, Catherine Dailey, 911 Analyst, Statewide 9-1-1 Bureau filed a Technical Review of the Application. The Technical Review met the requirements of 83 Illinois Administrative Code Part 1325. Staff recommends the following conditions:

- a. The NG9-1-1 and Recording Systems must be capable of processing all types of emergency calls, including voice, text, data, and multimedia information.

- b. In accordance with 725.405 i) 26) 9-1-1 system providers are required to cooperate with other 9-1-1 system providers in the installation of a new 9-1-1 system or migration of a system from another 9-1-1 system provider by transitioning system information and participating in bi-weekly implementation conference calls with all parties; applicant, involved originating service providers (OSPs) and Aggregators, involved 9-1-1 system providers (AT&T), Illinois Commerce Commission Telecommunications Staff and Department Staff;
- c. Submission of the Methods of Procedure (MOP), the conversion schedule for cutting over to the new system by carrier and exchange, to be provided to the Statewide 9-1-1 Administrator, Statewide 9-1-1 Bureau, and the Commission's Telecommunication Staff; and
- d. Any other reporting as deemed necessary.

#### IV. Findings and Ordering Paragraphs

**WHEREAS**, the Administrator, having considered the Applicant's Modification Plan and Department Staff Review, is of the opinion and finds that:

- (1) Applicant operates the 9-1-1 emergency services program for Fulton County, Illinois under the ETSA;
- (2) AT&T has authority from the Commission to operate as a 9-1-1 system service provider;
- (3) Applicant and AT&T seek to implement a NG9-1-1 i3 capable system as defined in the 83 Illinois Administrative Code Part 1325;
- (4) The Administrator has jurisdiction over Applicant and the subject matter herein;
- (5) The record reflects that Applicant's proposed 9-1-1 System modifications comply with Code Part 1325 and applicable laws; and
- (6) Applicant's proposed 9-1-1 System modification should be approved subject to the following conditions:
  - a. The NG9-1-1 and Recording Systems must be capable of processing all types of emergency calls, including voice, text, data, and multimedia information.
  - b. In accordance with 725.405 (i)(26) 9-1-1 system providers are required to cooperate with other 9-1-1 system providers in the installation of a new 9-1-1 system or migration of a system from another 9-1-1 system provider by transitioning system information and participating in bi-weekly implementation conference calls with all parties; applicant, involved OSPs, involved 9-1-1 system providers (Frontier Communications, INdigital, NG9-1-1, Inc.), Illinois Commerce Commission Telecommunication Staff and

- Department Staff;
- c. Submission of the Methods of Procedure (MOP), the conversion schedule for cutting over to the new system by carrier and exchange, to be provided to the Statewide 9-1-1 Administrator, Statewide 9-1-1 Bureau, and the Commission's Telecommunication Staff; and
  - d. Any other reporting as deemed necessary.

**IT IS THEREFORE ORDERED** by the Statewide 9-1-1 Administrator that pursuant to the Findings of Fact Fulton County's request to transition to the State's NG911 System pursuant to paragraph 1325.205 of 83 Illinois Administrative Code Parts is hereby approved.

**IT IS FURTHER ORDERED** that the authorization herein granted is subject to the conditions set forth in Findings No. 6 above.

This Order is a final administrative decision of the Statewide 9-1-1 Administrator subject to review under the Administrative Review Law, 735 ILCS 5/3-101. In the event you wish to seek review of or appeal this Order, you are advised:

1. Every action seeking review of such final decision shall be commenced by the filing of a Complaint and the issuance of Summons in the Circuit Court within 35 days from the date a copy of the decision was served upon the parties.
2. In your action seeking review you must name in the Complaint, and issue a Summons for each party of record to the case other than yourself.
3. Attached below is a list of all parties of record to this case, including the name and address of the agency or officer entering the Order, and the addresses of each party where the parties may be served with pleadings, notices, or service of process for any review or further proceedings.
4. You are not required to file any motion or request for reconsideration with the Department or the Statewide 9-1-1 Administrator before filing your action for review in the Circuit Court. The administrative rules of the Department do not require or allow for any further proceedings before the Statewide 9-1-1 Administrator.

Name of Officer who entered the final Order:

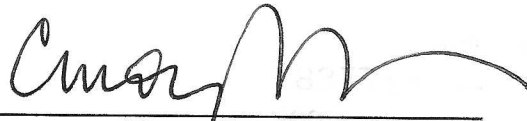
Cindy Barbera-Brelle  
 Statewide 9-1-1 Administrator  
 Illinois State Police  
 801 South Seventh Street, Suite 300-A  
 Springfield, Illinois 62703

Other Parties of Record:

Office of the Statewide 9-1-1 Administrator  
Illinois State Police  
801 South Seventh Street, Suite 300-A  
Springfield, Illinois 62703

Illinois State Police  
c/o Illinois State Police Legal Office  
801 South Seventh Street, Suite 1000-S  
Springfield, Illinois 62703

ENTERED: This 21<sup>st</sup> day of November 2023.

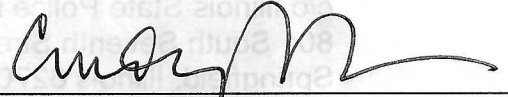


---

Cindy Barbera-Brølle  
Statewide 9-1-1 Administrator  
Illinois State Police  
Office of the Statewide 9-1-1 Administrator

**CERTIFICATE OF SERVICE**

The undersigned certifies that a copy of the foregoing ORDER was served upon the parties of record to the above Modification by electronic mail on November 21, 2023, addressed to such parties as shown below. The original was filed with the 9-1-1 Bureau, Office of the 9-1-1 Administrator, Illinois State Police as a part of the permanent file.



Cindy Barbera-Breffe  
Statewide 9-1-1 Administrator

**SERVICE LIST**

Chris Helle  
Fulton County ETSB  
260 W. Lincoln Street  
Lewistown, IL 61542  
[esda@fultonco.org](mailto:esda@fultonco.org)

Suzanne Bond, Legal Counsel  
Illinois State Police  
801 South Seventh Street, Suite 1000  
Springfield, Illinois 62703  
[Suzanne.Bond@illinois.gov](mailto:Suzanne.Bond@illinois.gov)

Assistant Deputy Director Michael Yokley  
Statewide 9-1-1 Advisory Board  
801 South Seventh Street, Suite 300-A  
Springfield, Illinois 62703  
[Michael.Yokley@illinois.gov](mailto:Michael.Yokley@illinois.gov)

Lisa Wirtanen  
AT&T  
Professional – Technical Service Management  
Customer Service & Operations  
10 South Canal Street – 25<sup>th</sup> Floor  
Chicago, Illinois 60601  
[lb9261@att.com](mailto:lb9261@att.com)

Office of the Statewide 9-1-1 Administrator  
801 South Seventh Street, Suite 300-S  
Springfield, Illinois 62703  
[ISP.911Admin@illinois.gov](mailto:ISP.911Admin@illinois.gov)  
[ISP.911Tech@illinois.gov](mailto:ISP.911Tech@illinois.gov)