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Wednesday, August 3, 2016

PA-PUC Secretary

Attn: Jan H. Freeman, Executive Director

Phone: 717-787-1035

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

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For our Pennsylvania's Public Utility Commission and staff

Subject: Important Information for the PUC reference to their upcoming 717 area code decision-making

Ladies and gentlemen,

Before getting started please note that I followed instructions by others in my attempt to get this important information to the PUC Executive Director, the commission and their staff.

The information that you are reviewing will most likely be the most important piece of information - part of the PUC's present work in progress and possibly effecting future PUC decision-making when it comes to collecting information from the public pertaining to the 717 area code telephone number change situation and **future** possible alternate solutions.

This is about your knowledge about a much larger problem as you will soon discover.

For purposes of tracking, I am responding to your **RFI** associated with Docket Number: P-2015-2510230 but this is about information at a much higher level of concern.

The following awareness information will give you a look into a problem that has roots in Pennsylvania because of decisions made by others in the past that reached a level of national attention within certain circles at a very, very... high level of government decision making.

Due to the nature of the problem that I will be bringing to your attention the following information is not to be posted on the Internet even though bits and pieces are available for vetting.

It is now your responsibility to check this information. In the past former Pennsylvania Governor's listened and then helped me to try to get to the bottom of the situation but what I discovered was that there were many components that created the mess that we are in today. Apparently others did their own thing and/or did not know anything about the bigger picture or **did not know how to check** the system to make sure that the **decisions they made** actually worked as part of the system and did not put the public at risk.

As an advocate for protecting responders and the public what I discovered throughout the years was that most issues are lost and or not understood once you get back to the state level of decision-making where they are subject to interpretation. The failure throughout the years was nobody was showing and then explaining these inherent systemic problems to them, in verbiage... they could understand as these problems continue to grow unchecked.

So... with that said I would like the opportunity to bring some very important issues to your attention that may affect your future decision-making about the 717 area code situation.

Please do not get offended because with this letter I am trying to prevent issues from repeating themselves that were creating more problems and deficiencies in source data from our state that eventually makes its way into our national data systems to be used by decision-makers and others that contain preparedness and protection information which came from our state master data systems that when checked in the system I and others discovered certain information was inaccurate, incomplete and/or misleading information that was not being voluntarily updated when changes were made that could cause confusion thus putting the general public at risk in their times of crisis or need.

To some this may be referred to as a ripple effect with unintended circumstances.

To be clear these problems **are real...** and they will not go away... **until properly addressed.**

I like many others are focused on data content and data quality pertaining to the accuracy of said information to some... this these type of problems enters into the world of QA/QC (quality assurance quality checks) to verify that the information you are receiving in times of crisis or need is correct, accurate, and up-to-date. It is that simple!

Ironically as you will soon discover area code 717 is assigned to our Commonwealth, and is presently used in an area of south-central Pennsylvania known as **Pennsylvania Dutch Country** that in federal circles this area encompasses the **4th Congressional District** where some initial problems were discovered and later was already used to get others attention such as in DHS, EPA, DOL, HHS/CDC, ATF, Dept. of Agriculture, to include and our Coast Guard's attention about a major operational coordination and information sharing problem pertaining to inaccurate and/or misleading data.

Area codes and telephone numbers used for emergencies and data verification **purposes is a key component** to our national, state and local preparedness verification process which in the system is directly tied to a structures physical locational information such as the name, Road name and House number assignment by a local municipality.

Welcome to the world of Blg... data and unintended consequences. Please learn from past experiences. This is what I call a lessons learned experience. This is not the first, nor... will it be the last time an area in our Commonwealth will run out of landlines that are used in certain applications such as emergency backup lifelines for the general public who have loved ones which some may have special-needs that enters the world of public Health and Life /Safety concerns.

Supporting information is available upon request if you would like to further vet this important information:

After my assessments and the **points** that I raised were confirmed, I suggest that you start to research these problems by reviewing <http://www.imrnet.com/weeklybrief/011812dpj.html> because of the topics being addressed back at that time **Scrubbing Source Data at the Local Level** my information was listed under their **Viewpoints**. Immediately after my article in the same **Viewpoints** our federal government, the EPA's Office of Information wrote their response to my article which was titled **Scrubbing Source Data: The EPA Response**.

Even though my information was prepared years ago it still applies today because these issues still have deep roots in Pennsylvania. These networking problems are huge because it is still work in progress!

Community outreach communication:

Keep in mind that many years earlier I showed others these types of problems that were growing exponentially with a simple workable solution in a basic PowerPoint format that has now been updated to a narrated video format making it easier for others who wanted more information about what I discovered to understand what was happening because others were not sharing information about these problems that sadly was only known by a few.

Later after a tragic event where responders died and a town was devastated other, some insiders started looking at the information in the system then they (the media) did a study and saw what I saw... **then** President Obama issued an **Executive Order #13650** that started the process of formally addressing these big data types of issues in motion. <https://www.whitehouse.gov/the-press-office/2013/08/01/executive-order-improving-chemical-facility-safety-and-security>

Again the problem that I discovered back at our state level was that nobody who works on these issues knew about E.O.13650 **and why it was issued**. Later at a state conference to my surprise when I asked others only our Governor at that time and myself knew about these deficiencies. That was embarrassing for other attendees at a high level of involvement!

As the PUC just **ask your staff** how many individuals know about why Executive Order 13650 was issued.

Please do not complicate these issues.

If the PUC would like some detailed information about some of the most recent work in progress pertaining to these types of data quality problems contact the **EPA Administrator** in Washington DC **Gina McCarthy** at phone: **202-564-4700** and reference the E-Enterprise platform CDX and TDX data verification **QA/QC** exchange procedures. Ask her where Pennsylvania decision-makers like the PUC who are trying to keep the public safe can go to learn about a public facing **FRS widget** tool to receive some **TRAINING** that was designed to address the first part of the larger national BIG Data problem dealing with correcting the errors in the system. Ask the administrator how important it is to have the FRS information linked to the contact information which is a name and telephone numbering information when it comes to protecting the health of a community to include our responders. This information is considered emergency response environmental protection information.

A misinterpreted area code could put millions at risk/

Please note that the EPA is one part of a larger group with two other chairs that are addressing these issues.

*If you find somebody in your organization that has **FLA** privileges it would make it much easier for you to understand these problems.*

Keep in mind that the issues that I am bringing to your attention may be difficult for some in your organization at first glance to understand, but again please... bear with me as I try to explain how a Pennsylvania seventh grade school student from south-central Pennsylvania years ago took my challenge and figured out a problem of this magnitude in approximately 90 seconds, and I am hoping that today many years later that our PUC can do the same so we can avoid future problems.

Telephone numbers and numbering sequences in layered information is a major component when it comes to solving the larger public safety problem.

Justification review:

The deficiencies that I discovered years ago were brought to others attention at the local, state and eventually the federal government level to include our Executive Branch, thanks to some help by my Congressman years ago the White House and later these types of data problems were eventually recognized by Pres. Obama when he issued **Executive Order 13650** which you will see that the very first thing listed in section 5 (b) was the issue I was addressing and is directly related to the issue that the PUC will be... addressing in the very near future as you render your decisions on future 717 area code changes.

Throughout the years as others kept asking me for more information I prepared numerous awareness videos that are broken down to a level that most people should understand that shows examples from our Commonwealth what happened and how the accumulated effect of the deficiencies that I am talking about combined with ambiguous information being provided or collected such as the gray area of changing telephone numbers keeping records up-to-date that such information is being used during times of crisis or need and is vital to the health and safety of the users of such data, such as our responders communities and individuals with loved ones having special-needs.

If you are a skeptic just take a moment and look at the data for yourself then turned the coin over and start tracing the source data back through the system and you will find out what happened.

These problems are real and they are most likely at multiple levels over and above what the PUC is presently addressing but I want to point out something that is very important, basically a poor and /or unwise decision could complicate existing matters. A simple telephone number is part of the layering of the information process and is the lifeline for many residents.

Before you render your final decision on the 717 area code issue please have your most technically qualified individual research the problem. If he or she needs help feel free to contact me and I will try to point you in the proper direction. He or she should contact those in our federal government at the top... working on these IT related data problems to make sure that in the end everything works properly.

Please do not get these issues confused with some of our present social media wireless communication issues in my opinion there is a drastic difference.

As earlier mentioned just look at the problem from the reverse side starting at the federal government level back towards our state where these changes are often made in the source data and never reported through the Error Notification - Error Correction - process for updates and changes.

Feel free to share this information with your staff because whatever your decision is about the 717 Telco numbering situation it has to conform with **existing** computerized **layering** of information known as data in all systems at higher levels such as in the EPA's **OEI** Office of Environmental Information, **OEM** (Office of Emergency Management), **RMP** which stands for the Risk Management Plan with their policy and guidelines. This vital data is shared with other aforementioned federal agencies departments etc.

FYI: FRS is known in certain circles of preparedness protection and stands for the **Facility Registry Service /System and** is recognized as our nation's **authoritative data system** and as part of its components when you need to verify or contact an individual or facility in times of crisis or need you will have to use the telephone number relate to the site's locational information preferably the location **of the front entrance door**, not necessarily the Telco D-mark, of said structure which though it is important to the industry is normally off to the side or the back of said structure.

But if the area code changes and is no longer electronically linked to the facility's information by an associated correct name and address etc. we have a heck of a problem. I hope you now understand how important this area code numbering sequence is going to be.

My suggestion is to have the application whatever you decide overseen by a much higher, **neutral...** authority over and above PEMA and DEP.

Please make sure that your ruling confirms to **PA Title 35** and the information used to protect the residents of our Commonwealth is accurate and complete up-to-date and not misleading.

If you have difficulty accessing information just contact me and I will see if I can help locate some individuals for you because as mentioned earlier there is a panel of specialists who have been working behind the scenes on these types of problems. We are not alone!

Others such as my state House Representative Kristen Phillips Hill from the 93rd District, on the Senate side Scott Wagner Pennsylvania's 28 Senate district, and on the federal side for Representation from the South-central Pennsylvania 4th Congressional District is Scott G. Perry are all aware of these larger data problems.

Also if you would like to talk to others within our state about these types of problems for their solutions to the problem feel free to contact me.

Thank you for reviewing this important information.

Now that you know some of the larger problems please make a wise decision on this 717 Telco numbering assignment relief situation.

If you would like more information that is being periodically updated as things change please contact me for a link giving you access to a **Scrubbing Source Data -Toolbox** of information made to help others look at and understand the problems we the public are facing, **and then** I will send you a link.

The enclosed DVD that I am providing contains some of my recent narrated awareness videos that should get you started.

These videos and the information being provided is progressive so simply start in the beginning and make your way towards the last video on the DVD then check the data and you should realize why you were contacted and how the Telco number issue is something to consider in the QA/QC Data Verification process.

Note: Since these larger problems were overlooked for years... I often repeat myself just to drive home a point that some people may find my information time-consuming or burdensome for them to review.

When you review my videos focus on a video that shows some **Stats** (statistical data) from south-central Pennsylvania to include **The Math** problem then send me your results so it can be shared with others.

Thank you for reviewing my information.

Good luck with your decision-making.

Sincerely,

Michael Jacoby
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Public HEALTH / Life Safety
Emergency Preparedness / Protection
Chemical Exposure concerns



"When was the last time you... checked the data in the system to protect your loved ones?" - Michael Jacoby

Learning how to **correct errors** in the system

Be vigilant:

"No question is a dumb question unless it is asked too... late" - Michael Jacoby 1986

Simply put... if you have a gut feeling that something is wrong, speak up and take action before... it's too... late!

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