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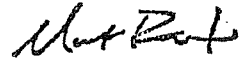
COURT OF APPEALS OF NEW MEXICO
ALBUQUERQUE

LIVING CROSS AMBULANCE SERVICE, INC.,

FILED

NOV 15 2016

**Plaintiffs-Appellants/
Cross-Appellees**



v.

No. 35,298

**VALENCIA COUNTY REGIONAL
EMERGENCY COMMUNICATIONS
CENTER; VILLAGE OF LOS LUNAS,**

**Defendants-Appellees/
Cross-Appellants,**

and

**BOARD OF COUNTY COMMISSIONERS
OF VALENCIA COUNTY,**

Defendants.

**PLAINTIFFS'-APPELLANT'S REPLY TO
VALENCIA COUNTY'S RESPONSE BRIEF**

CIVIL APPEAL FROM THE THIRTEENTH JUDICIAL DISTRICT COURT

The Honorable James L. Sanchez

Dist. Ct. No. D-1314-CV-2011-00512

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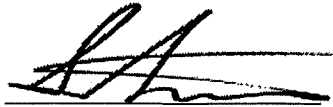
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Rule 12-213(G) NMRA Statement of Compliance

I HEREBY CERTIFY that Plaintiffs'-Appellants' Reply to County's Answer Brief was prepared using proportionally-spaced, 14-point, Times New Roman typeface in Microsoft Word 2016 word-processing program and that, pursuant to the limitations of Rule 12-213(F)(3) NMRA, its body, including headings, footnotes, quotations and all other text except the cover page, caption, table of contents, table of authorities, signature blocks, and statement regarding certificate of service, contains **3,464** words according to Microsoft Word 2016's word-count function.



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I. ARGUMENT

In Valencia County's Answer Brief, (CAB), the County completely fails to address LCAS's arguments that the VRECC and the local governments lack any express or implied power to charge a fee to LCAS for raising revenue for the VRECC. Instead, they conflate the power to contract with a power to charge a fee. And in doing so, the County wrongly advise this Court that it has the authority to contract with other ambulance providers not currently approved by the PRC to provide ambulance service in Valencia County.

Similarly, the County also completely fails to address the fact that the E-911 Act expressly and squarely places the burden to fund VRECC's operational shortfalls on the local governments within the jurisdiction VRECC serves even when "ambulance services" "are performed by others." New Mexico Administrative Code, (NMAC) E-911 Requirements, §10.6.2.8 [BIC, 23].

In its arguments, the County failed to reconcile the large body of statutes and administrative Rules requiring VRECC, as a PSAP, to provide dispatch services to *all* emergency responders, including to LCAS. It cannot be overstated, that under NMAC, E-911 Requirements, § 10.6.2.8(A), PSAPs are expressly required to deliver emergency 911 services to ambulance providers [BIC, 21-22]. The County ignored this. In addition, the NMDOH EMS Bureau Certification Rules expressly require the local governmental Defendants-Appellees to provide E-911 medical dispatch to

emergency ambulance responders. See NMDOH EMS Bureau Certification Rule 7.27.10.15 (NMAC - N, 3/15/2010) [BIC, 22].

A. Routing Emergency 911 Calls to LCAS is Not Only Dangerous, it is Contrary to the Legislative Intent and Purpose of PSAPs, and it Violates the E-911 Rules that Regulate the VRECC as a PSAP

The County’s Anti-Donation Clause (ADC) arguments largely rests on their contention that the VRECC, as the designated PSAP for Valencia County, can exercise its “option” to simply route E-911 calls to LCAS as it receives 9-11 calls. [CAB, 1].¹ However, if the VRECC, as the designated, publicly funded PSAP in Valencia County, were allowed to simply route emergency calls to private ambulance providers who are undeniably not PSAPs, the underlying purpose and legislative intent for creating PSAPs would be abrogated. Not only is it an exceptionally dangerous manner of dealing with emergency calls from the public, as explained below, but routing calls in the manner the County suggests will essentially undermine the very rationales the Legislature declared that support the necessity of creating PSAPs—efficiency, safety, faster response times, and consolidation.

¹ The “CAB” shorthand means “County’s Answer Brief.”

i. Call Routing is a Hazardous, Inefficient Manner of Dealing with Emergency 911 Calls

It is undisputed that VRECC dispatchers are required to be trained to perform the tasks of dealing with, and do in fact deal with, the public emergency 911 calls and provide LCAS with dispatch information extracted from the public calls, when the dispatcher determines that the call involves a medical emergency. In addition, there is always a constant line of communication so that all emergency responders can act in coordination through the VRECC. Public funding for PSAPs requires that the local governments employ properly trained staff pursuant to the Public Safety Telecommunicator Training Act [NMSA 1978, § 29-7C-1 through § 29-7C-9 NMSA 1978].

In addition, the New Mexico Emergency Medical Services Act, NMSA 1978, §§ 24-10B-1 to -12 (2003) ("EMS Act") defines "emergency medical dispatch" as:

"An advanced form of dispatch communications ... that utilizes specially trained emergency medical dispatchers, in accordance with an emergency medical dispatch priority reference system and the department-approved scopes of practice" [NMSA 1978, § 24-10B-3(I) (2003)].

The EMS Act is administered by the New Mexico Department of Health ("NMDOH"). The NMDOH rules duly promulgated to implement the EMS Act, define the phrase, "emergency medical dispatch" as a process that:

"is **not limited to call routing only**, but includes identifying the nature of the request, prioritizing the severity of the request, dispatching the

necessary resources, providing medical aid and safety instructions to the callers, and coordinating the responding resources as needed” [NMDOH EMS Certif'n Rules § 7.27.10.7(N) (NMAC 03-15-10)] (emphasis added).

VRECC does not now, and never has, provided LCAS with prioritized or coordinated unit dispatch. [RP, 135]. VRECC dispatchers have always performed the basic and essential task, however, of providing LCAS with the following information: (a) the nature of the emergency, (b) the general disposition of the patient, (c) the location of the emergency and (d) whether other emergency responders have been dispatched or “toned.” [RP, 135]. This level of dispatch information enables LCAS and VRECC to prioritize emergency medical calls internally and to control the movement of LCAS ambulance trucks and crews from one call to another, as well as allowing LCAS’ EMT teams to be prepared for the appropriate action on arrival—even when the circumstances suddenly change. E-911 dispatching requires that the VRECC dispatchers maintain and coordinate constant communication with *all* emergency providers including law enforcement, fire, rescue, and ambulance providers at all times during emergencies.

VRECC is the conduit for coordination between all responders. Dispatching is a real lifeline for the public, but it is also a lifeline for emergency responders such as ambulance providers and emergency medical technicians (EMT). E-911 Responders, including ambulance providers, who also provide EMT services, are often times placed at risk. Continuous cross-communication is essential to maintain

that lifeline. It is expressly contemplated in the large body of regulations and statutes that govern PSAPS, dispatcher training, and E-911 services in general.

What the County is suggesting in its arguments is that when the VRECC receives an emergency 911 call, instead of following the mandated dispatching protocols, the 911 dispatcher will simply identify if the caller is requesting emergency medical assistance and, if so, then forwards the call to LCAS without providing further information to LCAS to deal with the emergency.

It is undisputed that LCAS is not a PSAP. Nor does it employ trained dispatchers or receive the funding that VRECC receives for dispatcher training. LCAS is certificated by the NMPRC, and optimized primarily for response, not dispatching. Call routing will only further delay the response time, complicate the common situation where multiple different responders (ambulance, police, fire, etc.) may be required at a single scene or at multiple scenes. In short, it will have the practical effect of severing LCAS from the other emergency responders and from VRECC who is supposed to coordinate response. Routing calls to LCAS will decentralize a E-911 system that was created for the very purpose of consolidation of dispatching to make response times faster. Call routing undermines this.

ii. Call Routing is Contrary to Law and to the Clear Legislative Intent of the funding and Establishment of PSAPs.

In their Answer Brief, the County specifically relies on § 63-9D-3(Q) of the E-911 Act as the statutory authority for the proposition that the VRECC has the option to merely route incoming emergency calls to LCAS. Not only does the County completely misinterpret § 63-9D-3(Q) of the E-911 Act, (which is the definition of a PSAP), but the County fails to reconcile its argument with other relevant provisions of the E-911 Act and with provisions of the NMAC, E-911 Requirements, rules which expressly limits the circumstances when VRECC can simply route calls.

Starting with § 63-9D-3(Q) of the E-911 Act, which the County claims supports its argument, it states in full:

"public safety answering point" means a twenty-four-hour local communications facility that receives 911 service calls and directly dispatches emergency response services **or that relays calls to the appropriate public or private safety agency**" [NMSA, 1993, § 63-9D-3(Q)] (Emphasis Added).

In the first place, call routing cannot be gleaned from the definition of a PSAP. It must be read with other more relevant text. In establishing the regulatory framework and funding for PSAPs, the Legislature made a number of findings which are codified in the E-911 Act, § 63-9D-2. The legislature expressly found that the consolidation of enhanced 911 dispatching provides "faster response time which

minimizes the loss of life and property.” E-911 Act § 63-9D-2(A)(2). It further declared:

“It is the purpose of the Enhanced 911 Act [63-9D-1 through 63-9D-11.1 NMSA 1978] to further the public interest and protect the safety, health and welfare of the people of New Mexico by enabling the development, installation and operation of enhanced 911 emergency reporting systems to be operated **under shared state and local governmental management and control**” [E-911 Act, § 63-9D-2, Findings and purpose (1993)] (Emphasis added).

Thus, not only is call routing discordant with consolidation, but only government can operate a PSAP. In addition, under NMAC, E-911 Requirement rule, § 10.6.2.7, a PSAP can only route calls to another PSAP, and only when there is a power outage. As further clarification of the legislative intent, under NMAC, E-911 Rule, § 10.6.2.11(D)3, “[o]nly incorporated municipalities, counties, state police or native American tribes or pueblos, public safety agencies or their authorized agents may receive 911 calls.” Under NMAC, E-911 Requirement, §10.6.2.11(D)20, PSAPs cannot forward calls unless it is to another PSAP. NMAC, E-911 Rule §10.6.2.11(D)20 states:

“Callers to 911 may **only** be transferred once to another PSAP. If, after the transfer, the 911 caller is not connected to the appropriate PSAP, the receiving PSAP shall take all of the necessary information to handle the call and then contact the appropriate PSAP for response.” (Emphasis added).

Furthermore, the NMAC, E-911 Requirements rules do not contemplate routing calls to a non PSAP, ambulance responder. Conversely, call routing to PSAPs is contemplated under limited circumstances. NMAC, E911 Rule §10.6.2.7H states:

“Alternate routing” means an optional feature that is capable of automatically rerouting 911 calls to a designated alternate location if all 911 trunks from a central office or a public safety answering point (PSAP) are out of service.” (Emphasis added).

Finally, NMAC E911 Rule § 10.6.2.15.A expressly requires consolidation of dispatch functions in counties and discourages more than one PSAP in each county.

It states:

The division **requires** that municipal and county public safety answering points (PSAPs) within their contiguous county boundaries **consolidate their 911 call answering and radio dispatch functions** within one consolidated PSAP in the county [NMAC, Rule § 10.6.2.15.A] (Emphasis added).

Reading these regulatory requirements and the legislative intent expressed in the E-911 Act, it is clear that the County’s proposed call forwarding (routing) scheme is contrary to the manner in which a PSAP is supposed to operate under the legislative and administrative framework.

The E-911 Act and the NMAC, E911 Rules demonstrate that routing calls (call-forwarding) is not only contrary to the intent for establishing PSAPs (because it is grossly inefficient and further delays response times), but that forwarding calls to LCAS violates the E-911 Rules. Call-forwarding (routing) emergency callers to LCAS would decentralize an already centralized, consolidated E-911 system for

accepting emergency calls from the public. VRECC's public funding is based on compliance with these rules.

B. The County's Anti-Donation Clause Arguments Are Overly Simplistic, Misapplied, and Evade the Underlying Policy Rationales Supporting the Anti-Donation Clause

Completely ignoring the fact that LCAS's provision of ambulance services benefits the County, the County contends that because dispatch is "something of value" to LCAS, it amounts to a prohibited donation under the Anti-Donation Clause (ADC) [CAB, 5]. This overly simplistic argument ignores the legal facts that the VRECC and specifically the County are required to deliver E-911 services to emergency responders, specifically including ambulance services [NMAC, E911 Requirements, § 10.6.2.8(A)]. [See BIC, 29-30].

As more fully detailed in LCAS's Brief in Chief, ambulance providers like LCAS are undeniably within the chain of emergency responders targeted for dispatch service (not call-routing). NMDOH EMS Certification Rules §§ 7.27.10.1 to 25 (NMAC 03-15- 10). Funding for PSAPS, like VRECC, was established partly because the legislature expressly found that enhanced E-911 dispatching provides "faster response time which minimizes the loss of life and property." E-911 Act § 63-9D-2(A)(2). Thus, dispatching to ambulances is a necessary legal duty of PSAPs and it is a necessary function in order for local governments to meet their legal

duties. The ADC does not apply in this case precisely because to meet one of its funding purposes, VRECC is legally obligated to provide dispatch services to ambulances.

In addition, under the ADC, the proper test for determining if dispatching is a prohibited donation requires examination of the alleged donation, and not merely how it benefits LCAS. The County's focus on the benefits to LCAS is not the test under the ADC. A donation for purposes of the ADC must be interpreted "in its ordinary sense and meaning as a gift, an allocation or appropriation of something of value, without consideration to a person, association or public or private corporation." *Village of Deming v. Hosdreg Co.*, 1956-NMSC-111, ¶36. The focus is on the alleged donation. The New Mexico Supreme Court has found that if a benefit to private industry results from a project involving revenue bonds from a publicly owned project, not only is a debt in the constitutional sense not created, but, as a result, the benefit does not amount to a donation. In *Hosdreg Co.*, 1956-NMSC-111, 62 N.M. 18, ¶¶ 29-30, after determining that industrial revenue bonds, although benefitting private industry, does not create an impermissible debt, the court then asked the question, and answered in the following way:

"Does the giving of aid to private enterprise, here shown, amount to the making of a donation to a private corporation within the prohibition of Const. Art. IX, Section 14? A careful reading of the constitutional provision invoked in this challenge seems convincing that it does not."

As shown in more detail in LCAS' Brief in Chief, it is undisputed that all of the public funds appropriated for the VRECC's operation are utilized to fulfill the VRECC's legal duties of dispatch [BIC, 30]. Significantly, in its Answer Brief, the County does not dispute that dispatching to emergency responders, like LCAS, is a government function. VRECC must dispatch to all emergency responders, including, fire, rescue, law enforcement and ambulance providers. Thus, fulfillment of a legal duty is not a "donation" in the constitutional sense. The fact that dispatching to LCAS is a benefit to LCAS, to the public, and to the others recipients who receive dispatch is not what defines the constitutional character of dispatching for the ADC analysis. As argued in detail in LCAS' Brief in Chief, what defines an alleged donation under the ADC is the nature of the alleged donation.

Dispatch is not a debt nor is it an investment in LCAS. Dispatching is in entirely different class of "benefit" than a donation that runs afoul of the ADC. Specifically, dispatching is a government function which VRECC is legally required to provide. The County completely ignores these determinative facts in their ADC analysis.

Furthermore, in their Answer, the County misconstrues the distinction between a "public purpose" and a "governmental function" discussed in LCAS' Brief in Chief. [BIC, 29-33]. It is clear from the case law, that a public purpose alone is insufficient. However, when the state receives "present value" for its dispatching,

(here, ambulance service without charge to Valencia County) and is performing a governmental function² (here, E-911 dispatching), while fulfilling a legal obligation,³ then under the well-established ADC case law, governmental emergency dispatching to LCAS is not subject to any claim of unconstitutionality.

This policy rationale underpinning the ADC was squarely expressed by the New Mexico Supreme Court in *City of Clovis v. Southwestern Pub. Serv. Co.*, 1945-NMSC-030, where the Court addressed these deep-seated ADC policies. In *City of Clovis*, the Court stated that the ADC “should be construed with reference to the evils it was intended to correct.” Id ¶20. The Court explained that the ADC is intended to prevent the investment of public funds in private enterprises, and that it is **not** intended to affect governmental services to the public or the accomplishment of governmental functions. Id ¶49. Citing a previous case, the Court explained:

"The reason for this amendment was that, during the years immediately preceding its adoption, the state and many of its counties, cities, and towns had by legislative enactment become stockholders or bondholders in, and had in other ways loaned their credit to, and had

2. See *State ex rel. State Eng'r v. Lewis*, 2007-NMCA-008, ¶ 50. The State purchased water rights in order to avoid priority administration that relieves junior rights holders of financial hardship. The transaction did not violate the Anti-Donation Clause because the state receives present value for its purchase even though future priority calls may diminish that value. In addition, the state receives valuable consideration in being able to better meet its water delivery obligation to Texas.

3. AG Op. No. 76-06 (1976) (vouchers for special education at private institutions when public school programs do not meet students' needs do not violate the Anti-Donation Clause because the state has a legal obligation to provide an education).

become interested in the organization and operation of, railroads, banks, and other commercial institutions...These obligations fell ultimately on the taxpayers. Hence the amendment, the essence of which was to restrict the activities and functions of the state, county, and municipality to that of government, and forbid their engaging directly or indirectly in commercial enterprises for profit.” *City of Clovis*, 1945-NMSC-030, ¶ 24.

E-911 dispatching is not only a clear government function, but as the designated PSAP for Valencia County, dispatching to ambulance providers is also a clear duty of VRECC. Thus, dispatching cannot seriously be considered to fall within the purpose of the ADC constitutional inhibition as one of the evils it was ended to remedy. There are no facts to be found in the present circumstances where it can be said to appear that the local governments have invested or financed LCAS in any manner. Moreover, because the term “donation” in the ADC must be applied “in its ordinary sense and meaning as a gift, an allocation or appropriation of something of value, without consideration to a person, association or public or private corporation,” under *Village of Deming v. Hosdreg Co.*, 1956-NMSC-111, 62 N.M. 18, ¶ 36, dispatching to LCAS cannot rationally be considered a donation under the ADC. [BIC, 39].

C. The County Conflates the Power to Contract as a Source of Power to Impose the Revenue Enhancing Dispatch Fee

In their Answer Brief [CAB, 10], the County erroneously suggests that “because the VRECC is not required to provide [dispatch] services for free...it may

contract with private parties...in the absence of a statutory prohibition...” However, ambulance services are highly regulated and certificated by the PRC, and in Valencia County, there are only two NMPRC certificated ambulance providers eligible to provide ambulance services in Valencia County. [BIC, 19, and 30].⁴ Because there are already certified, established ambulance providers, including LCAS, under clear New Mexico law, no local governmental entity in Valencia County has current authority to operate or contract for its own ambulance service. NMSA 1978, § 5-1-1(A) & (B). [BIC, 32]. For the complete analysis of how the local government Appellees are precluded from contracting for ambulance service under NMSA 1978, § 5-1-1, please see “*Plaintiff’s Response in Opposition to Defendant Board of County Commissioners of Valencia County Motion for Judgment on the Pleadings.*” [RP, 82-118]. This issue was thoroughly briefed by LCAS to the District Court, before being withdrawn by the County. It is undisputed that the local governments in Valencia County do not presently operate or contract for an ambulance system, nor do they currently have PRC authority to do so. [RP, 22]. The County has conceded this point. [RP, 122-123].

As shown in LCAS’ Brief in Chief, the local governments have no power to raise revenue for the VRECC by imposing a dispatch fee on LCAS---an argument

⁴ The PRC’s power to exclusively regulate ambulance services was well briefed in LCAS’s Complaint [RP, 6-10].

to which the County fails to respond. Therefore, despite the County's vague and irrational argument to the contrary, the local governmental Appellee cannot use its power to contract as a means to impose an illegal dispatch fee. Nor can it simply contract with some other ambulance provider to provide ambulance services in Valencia County because LCAS believes the fee is unlawful.

Finally, LCAS respectfully notes again, as argued extensively in LCAS' Brief in Chief, that "the responsibility and authority for delivering emergency medical services...generally rests with the state, counties, and municipalities...even when supplemental services are performed by...private ambulance companies." NMAC, §10.6.2.8. [BIC, 22]. LCAS's ambulance service is provided without charge to any local governmental entity, and it is therefore the kind of "mutual consideration" the County recognizes, in its Answer Brief, is necessary in any contract negotiation. [CAB, 11]. Without an acknowledgement from the local government parties that LCAS's provision of ambulance service in Valencia County is consideration for dispatch service, any alleged contract negotiation will not have mutual consideration and, as a result, would fail.

Respectfully Submitted,



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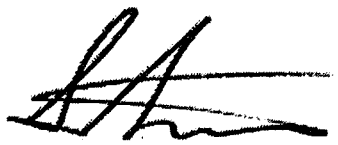
CERTIFICATE OF SERVICE:

I HEREBY certify, that pursuant to Rule 12-307.2(B), NMRA, on November 15, 2016, I sent a copy of this Pleading to the following counsel of record, via email as indicated below:

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