

Testimony to the Council of DC, Committee on the Judiciary & Public Safety
2021 Performance of the Office of Unified Communications
February 17, 2022

Thank you for the opportunity to again provide written testimony for the annual performance hearing of the Office of Unified Communications. As I noted [last year](#), I fortunately have only rarely needed to call 9-1-1 in the District, but I am a frequent and active user of the 3-1-1 system—in 2019, when they changed the backend system they use, they “identified [me] as a 311 Super User” because I had “submitted at least 100 service requests” in the previous year. So once again I want first to publicly and openly thank the OUC staff who handle all these requests.

DC’s Department of Transportation has said repeatedly that they prioritize sidewalk and roadway repairs based on 3-1-1 requests. The Pedestrian Advisory Council¹ and others have told DDOT and testified to Council about why DDOT shouldn’t do this: for one thing, we know relying on 3-1-1 reports “misses needs that don’t get reported, which are likely to be concentrated in particular neighborhoods of the District where, for reasons such as access to technology, available time, and trust in government, people are less likely to report. These are often the same areas where people are most likely to die in traffic violence.”² It’s *also* problematic because DDOT and OUC don’t seem to be able to work together to help people file reports.

For example, one of the problems I most frequently attempt to report is Safe Accommodations issues. As Committee members may be aware, those who receive permits for construction in sidewalks or bikeways are required by DC law³ and regulation⁴ to provide an equivalent alternative pathway. DDOT’s Public Space division issues the relevant permits and conducts enforcement; while the quality of DDOT’s permits and enforcement is a matter for a different committee, there is also a major problem with trying to *request* enforcement through 3-1-1.

For those who wish to submit using the website or app, it is unclear how to categorize such reports,⁵ and even 3-1-1 staff themselves don’t seem to know where to put them when they are submitted via Twitter: I continue to have Safe Accommodations reports I submit sent to DCRA as Illegal Construction reports,⁶ sent to DDOT as Traffic Safety Investigation requests,⁷ or conveyed to DDOT directly, outside the standard 3-1-1 system and with no tracking number provided⁸—or they are simply never responded to at all, a category which this year

¹—I am the Ward 1 Representative on the PAC, though I am writing today solely in my personal capacity.

²—DC PAC, “Testimony at DDOT FY2022 Budget Hearing”, <https://drive.google.com/file/d/1q6d4AdWNNLg32OEnrngSZ4DVmOBwddp/view> (June 10, 2021).

³—DC Law 20-49, the Bicycle Safety Amendment Act of 2013, §3(a), DC Code §10-1141.03 (f), [https://code.dccouncil.us/dc/council/code/sections/10-1141.03.html#\(f\)](https://code.dccouncil.us/dc/council/code/sections/10-1141.03.html#(f))

⁴—DCMR Title 24, §3315, <http://dcrules.elaws.us/dcmr/24-3315>, <https://dcregs.dc.gov/Common/DCMR/SectionList.aspx?SectionNumber=24-3315>

⁵—See, for example, <https://twitter.com/zacycles/status/1432782863481643011>

⁶—<https://twitter.com/infinitebuffalo/status/1428188824614707200>, <https://twitter.com/infinitebuffalo/status/1445926876476854274>, among others

⁷—<https://twitter.com/infinitebuffalo/status/1420193415027888134>, <https://twitter.com/infinitebuffalo/status/1432775625165709318>

⁸—<https://twitter.com/infinitebuffalo/status/1448345929862504461>, <https://twitter.com/infinitebuffalo/status/1448402475753656328>

includes nearly half of all Safe Accommodations reports I made.⁹

Why, eight years after Safe Accommodations was passed, is it still impossible to request enforcement through 3-1-1? Obviously some of this may be on DDOT, and I'll be asking *their* hearing what DDOT has or should've been doing to work with OUC, but what has OUC been doing to work with DDOT (and other departments) to make sure regular occurrences have appropriate places to file reports?

This is not the only type of issue where it is unclear to both users and 3-1-1 staff how to file reports, as Christopher Mrstik, WABA's Ursula Sandstrom, and I all noted in testimony last year,¹⁰ so it is clear that OUC needs to restructure their reporting categories so that residents can report problems accurately and get them fixed promptly and properly.

Another issue several of us touched on last year which continues to be a problem is that when issues are reported in the wrong category, or to the wrong agency, they simply get closed, perhaps with a note to the original user that they need to be reported differently or to some other organization. As noted, 3-1-1 sends many of my Safe Accommodations requests to DCRA, in which case, I get an email a week or two later informing me that construction in Public Space is a matter for DDOT, and the request is closed.¹¹ If we consider the 311 system like a software company's bug-tracking system—similarly, a database for receiving problem reports, assigning them to staff/departments for resolution, and tracking their progress until completion—it should become apparent that DC's system of simply closing mis-assigned tickets is inadequate.

When an agency illegitimately closes a report without doing the service requested, or only does half, instead of reopening the previous request, 3-1-1 creates a whole new one.¹² This boosts the number of service requests that the agency can claim have been successfully resolved, and since it restarts rather than continuing the clock on how long it takes to resolve the complaint, this practice also allows the servicing agency to lower its apparent time-to-resolution. This practice that artificially improves everyone's statistics without actually improving service for residents should end.

I appreciate nearly every day the ability to use DC 3-1-1 as I do, but it could be even better—and I suspect improving the system for residents and visitors would make it more usable for District agencies and staff as well. A system with reporting categories for the things people request from District agencies, where reports were assigned to agencies actually responsible for resolving them I believe would help both residents and 3-1-1 staff actually submit requests and get them fulfilled successfully.

Thank you for your time.

⁹—including, among others, at private construction sites (<https://twitter.com/infinitebuffalo/status/1490093834977566725>); utility sites (<https://twitter.com/infinitebuffalo/status/1390511075075010560>, <https://twitter.com/infinitebuffalo/status/139410952254376196>, <https://twitter.com/infinitebuffalo/status/1469440620485873672>); and DDOT projects large (<https://twitter.com/infinitebuffalo/status/1405704850839457793>, <https://twitter.com/infinitebuffalo/status/1455317423364706305>) and small (<https://twitter.com/infinitebuffalo/status/1400166036113141760>, <https://twitter.com/infinitebuffalo/status/1423125895288659968>).

¹⁰—Hearing Record HR24-33, Committee on the Judiciary & Public Safety 2021 Performance Oversight Hearing on the Fire & Emergency Medical Services Dept and the Office of Unified Communications, https://lims.dccouncil.us/downloads/LIMS/46767/Oversight_Hearing_Record/HR24-0033-Oversight_Hearing_Record.pdf#page=34 (March 23, 2021), pp.34–39.

¹¹—This year my reports that 3-1-1 entered as TSI requests in fact got treated as requests for Public Space investigations, but not until well after the closure had been resolved. In the past, they often got closed because they weren't requests for a traffic safety investigation; for how this often read to users, see <https://twitter.com/zacycles/status/1261063014532472832>

¹²—for example, <https://twitter.com/infinitebuffalo/status/1409690997563351045>, or <https://twitter.com/311DCgov/status/1057325474974744582>