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June 21, 2013

Mr. William Youell
Director
Division of Statewide Emergency Telecommunications
1111 Country Club Road
Middletown, CT 06457

Regarding: NPRC Docket 13-01 "Proposed changes to DESPP regulations regarding the subsidization of regional public safety emergency telecommunications centers, multi-town PSAPs and eligible municipalities."

In response to the NPRC Docket 13-1 regarding proposed changes to the funding of regional centers I submit the following suggested formula changes for the funding of regional communications centers and cities with populations greater than 40,000.

The new formula should be as follows:

REGIONAL COMMUNICATIONS CENTERS

For regional centers the subsidy should be calculated as follows, the actual operating expenses for the previous year, as presented in the regional center's required annual audit submitted to the Division of Statewide Emergency Telecommunications, shall be multiplied by the per capita call volume number as calculated by DSET for the calendar year. If the per capita number for a regional center is less than the median number for the state then the state median number shall be used, this number shall be labeled as value A. The calculated dollar number shall then be subtracted from the actual operating expense number. The resulting number shall be multiplied by 40 percent, this number shall be labeled value B. Value A and value B shall be added together to determine the annual subsidy for the regional communications center. The new funding levels are shown in the attached excel spreadsheet.

CITIES

For the calculation of the subsidy for cities with populations greater than 40,000 the formula should be as follows. The first \$400,000 of operating expenses of and eligible cities PSAP shall be multiplied by the actual calls per capita number. If the actual per capita number, for a given city is below the state median number then the state median per capita number shall be used.

MULTI TOWNS

Multi towns comprised of a town and a borough should not be funded. Multi towns serving two distinct separate towns can be funded as a regional only if their aggregate town population exceeds 40,000.

Examples of both calculations are show in the attached spread sheet. The revised formulas provide for a clear and uncomplicated method to calculate the subsidy that is directly related to expenses and the call volume of the regional center or city. The perceived "unfairness" of the number of towns served in the current formula is eliminated; additionally the impact of population is removed. Funding is fairly based upon actual expenses and per capita call volume. The new formula can be phase in over a four year period for those regional centers and cities would receive less state funding under the new formula. A phase in approach would allow the regional center or city of receive 75 per center of the difference between the new formula funding and the old formula in year one, 50 percent in year two, 25 percent in year three and in year four they would receive the funding level determined by the new formula. . This would allow regionals and cities that are losing money to adjust over a number of years.

No change to the formula can be achieved without some adjustment in funding levels, to create a formula that raises all boats required that every centers funding would go up. This would be unsustainable from a funding level. The proposed formula provides increase funding for most regional center and cities.

In response to the issue of removing the additional value for resident trooper towns for the regional centers I maintain that the only true solution would be either have the regional center dispatch for the State Police or have the State Police replace the regional centers. Neither scenario is going to happen. Yes full service is not provided but the regional centers are going to stay and the State Police are not going to relinquish their control over dispatching for police related events. No change should be made in this regard.

Again, all the possible scenarios for adjustments in the current application / calculation of variables result in changes to the levels of funding for the cities and for regional centers. The changes suggested above create a fair distribution of funding for all.

Sincerely



George J. Pohorilak
E911 Commissioner

Attachments 1
Excel Spread Sheet

DSET DOCKET NUMBER 13-01

Proposed changes to DESPP regulations regarding the subsidization of regional public safety emergency telecommunications centers, multi-town PSAPs and eligible municipalities

SUBMITTED BY

George J. Pohorilak - E911 Commissioner

	TOTAL	ACTUAL	STATE		A		B	A+B
	EXPENSES	CALLS/CAP	MEDIAN#	CAP# USED	P.CAP x EXP.	2013 STATE \$	PLUS 40% OF DIF	NEW STATE \$
Colchester	\$961,390	0.272	0.33824	0.33824	\$325,180.55	\$289,065.76	\$254,483.78	\$579,664.33
LCD	\$1,494,400	0.29791	0.33824	0.33824	\$505,465.86	\$1,060,715.74	\$395,573.66	\$901,039.51
NWPS	\$627,270	0.40949	0.33824	0.40949	\$256,860.79	\$249,201.74	\$148,163.68	\$405,024.48
Quinebaug	\$1,217,152	0.3798	0.33824	0.3798	\$462,274.33	\$972,024.67	\$301,951.07	\$764,225.40
Tolland County	\$1,055,543	0.30806	0.33824	0.33824	\$357,026.86	\$889,767.08	\$279,406.45	\$636,433.32
Valley Shore	\$1,260,366	0.51017	0.33824	0.51017	\$643,000.92	\$352,167.20	\$246,946.03	\$889,946.95
Groton*	\$750,000	0.39823	0.33824	0.39823	\$298,672.50	\$164,801.70	\$180,531.00	\$479,203.50
TOTAL						\$3,977,743.89		\$4,176,333.99
*estimated \$								
					ACTUAL			
		ACTUAL	STATE		CALLS.CAP.			
	1ST 400k / EXP	CALLS/CAP	MEDIAN#	CAP # USED	x IST 400k	2013 STATE \$		NEW STATE \$
Bridgeport	\$400,000.00	0.86723	0.33824	0.86723	\$346,892.00	\$45,893.45		\$346,892.00
Bristol	\$400,000.00	0.40629	0.33824	0.40629	\$162,516.00	\$134,486.55		\$162,516.00
Danbury	\$400,000.00	0.40734	0.33824	0.40734	\$162,936.00	\$181,472.98		\$162,936.00
East Hartford	\$400,000.00	0.4987	0.33824	0.4987	\$199,480.00	\$113,973.05		\$199,480.00
Enfield	\$400,000.00	0.3009	0.33824	0.3009	\$120,360.00	\$99,292.29		\$120,360.00
Greenwich	\$400,000.00	0.3551	0.33824	0.3551	\$142,040.00	\$133,233.34		\$142,040.00
Hamden	\$400,000.00	0.47749	0.33824	0.47749	\$190,996.00	\$135,248.70		\$190,996.00
Hartford	\$400,000.00	1.27399	0.33824	1.27399	\$509,596.00	\$768,548.89		\$509,596.00
Manchester	\$400,000.00	0.39275	0.33824	0.39275	\$157,100.00	\$129,513.71		\$157,100.00
Meriden	\$400,000.00	0.47759	0.33824	0.47759	\$191,036.00	\$135,030.94		\$191,036.00
New Britain	\$400,000.00	0.67836	0.33824	0.67836	\$271,344.00	\$164,413.80		\$271,344.00
New Haven	\$400,000.00	1.04887	0.33824	1.04887	\$419,548.00	\$604,669.53		\$419,548.00
Norwalk	\$400,000.00	0.37396	0.33824	0.37396	\$149,584.00	\$192,114.12		\$149,584.00
Norwich	\$400,000.00	0.58486	0.33824	0.58486	\$233,944.00	\$69,380.54		\$233,944.00
Southington	\$400,000.00	0.28977	0.33824	0.28977	\$115,908.00	\$95,774.87		\$115,908.00
Stamford	\$400,000.00	0.52224	0.33824	0.52224	\$208,896.00	\$115,324.02		\$208,896.00
Stratford	\$400,000.00	0.42862	0.33824	0.42862	\$171,448.00	\$100,127.76		\$171,448.00
Waterbury	\$400,000.00	0.60719	0.33824	0.60719	\$242,876.00	\$244,839.96		\$242,876.00
West Hartford	\$400,000.00	0.33182	0.33824	0.33182	\$132,728.00	\$140,690.37		\$132,728.00
West Haven	\$400,000.00	0.54969	0.33824	0.54969	\$219,876.00	\$123,269.89		\$219,876.00
TOTAL					\$4,349,104.00	\$3,727,298.76		\$4,349,104.00