Before the
DEPARTMENT OF EMERGENCY SERVICES AND PUBLIC PROTECTION
DIVISION OF STATEWIDE EMERGENCY TELECOMMUNICATIONS
Middletown, Connecticut 06457

In the Matter of:	)	
	)	
Notice of Proposed Regulatory Change related to	)	
DESPP regulations regarding the subsidization of	)	DSET Docket No. 13-01
Regional Emergency Communications Centers, multi-	)	
town Public Safety Answering Points and eligible	)	
municipalities	)	

COMMENTS OF QUINEBAUG VALLEY EMERGENCY COMMUNICATIONS, INC.

1. Quinebaug Valley Emergency Communications, Inc. (QVEC) submits these Comments in response to the Division of Statewide Emergency Telecommunications Notice of Proposed Regulatory Change in the above-captioned proceeding.[1] This proceeding solicits public input prior to formulating proposed changes intended to modify the existing regulations codified in Regulations of State Agencies Sec. 28-24-1 through 28-24-14, related to the subsidization of several types of 9-1-1 call receipt centers. The regulations eventually formulated, hopefully vetted by the E-911 Commission, and proposed for adoption are subject to the regulatory review process, including public notice in advance of a hearing before the Legislative Regulations Review Committee as required in C.G.S. Chapter 54.

Quinebaug Valley Emergency Communications, Inc.

2. QVEC is a 501(c)(3) non-profit corporation that has operated a Regional Emergency Telecommunications Center located in Killingly since 1974. A predecessor corporation, the WB Switchboard Group Inc., provided similar services funded by the government of Windham County and based at the Windham County Jail in Brooklyn, later a Connecticut Correctional Center, starting in the early 1950's.

QVEC currently serves thirty-four fire departments and fourteen medical response organizations in sixteen towns, two boroughs and one fire district. The population of this region (2011 data) is 103,395 and its area is approximately 530 mi.

SUMMARY

3. In these comments, QVEC supports: A. Recognition of the fact that continued existence of an excessive number of small PSAPs in Connecticut is the largest factor influencing cost and effectiveness of the State's 9-1-1 system, B. Affirmation or establishment of DSET subsidy policy and clarification of transition grant policy to provide incentives that progressively promote the creation of larger, more labor efficient and cost effective Regional Centers as the alternative to operation of too many small PSAPs, C. Initiation of persistent efforts by DSET, perhaps established in collaboration with the Legislature and the Connecticut Chiefs of Police Association, to encourage stand-alone municipal PSAPs to consolidate into Regional Centers, assisted by a liberalized transition grant policy, D. Implementation of any new subsidy payments over at least a four-year time interval to avoid the risk of municipal budget rejection due to abrupt increases in local costs and to ease the impact of increased subsidies on the 911 Fund, E. Establishment of a subsidy calculation methodology proposed by G. Pohorilak based on only expense and 9-1-1 call per capita data, and F. Consideration by DSET of a region's ability to pay additional taxes as a final term in adjustment of subsidies similar to the manner in which such adjustments are applied to Connecticut's Educational Cost Sharing Grants to municipalities.

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[1] Notice of Proposed Regulatory Change, DSET Docket No. 13-01, released May 28, 2013

QVEC COMMENTS

I. INTRODUCTION

4. Connecticut's 9-1-1 calls are answered and resources are dispatched to respond to incidents reported through 106 Public Safety Answering Points (PSAPs). This number does not include the four secondary PSAPs (a PSAP that receives a call first answered by another 9-1-1 center) operated by the Connecticut State Police (CSP). Three of these secondary PSAPs will merge with another CSP Primary PSAP later this year and will relocate to a central location as part of a longer term plan that probably will result in eventual consolidation of all CSP communications facilities into three dispatch centers. This plan, while suffering criticism from many interest groups, illustrates the extent to which technology can facilitate consolidation, drive improved labor efficiency and make practical the service of large areas from a common PSAP. Connecticut's 106 PSAPs are comprised of seven Regional Emergency Communications Centers (RECCs - centers that provide service for three or more municipalities), nine multi-town PSAPs (MTs – centers that provide service to exactly two municipalities), seven Connecticut State Police PSAPs (not including the four CSP secondary centers mentioned above), and eighty-three stand-alone municipal PSAPs.[2] Twenty-two of the municipal PSAPs are operated by cities having over 40,000 population. These entities as well as the RECCs and MTs are subsidized by the 9-1-1 Fund. The seven RECC's taken as a group provide service for 75 towns, over 44% of the towns in the state.

5. It has long been understood that utilization of the large number of small PSAPs in Connecticut represents a highly inefficient and perhaps less effective way to provide critical emergency services to the public. The current Docket describes efforts of a Legislative Task Force in 1996 and those of a Subcommittee of the E-911 Commission in 2004-2005, both of which recommended, among other things, financial incentives aimed at creating more RECCs and providing additional financial incentives to existing RECCs as well as providing inducements to encourage towns to join RECCs in the form of Transition Grants.[3,4] The current funding formula, or an earlier, nearly identical, version has been the method by which subsidies for funded entities have been determined in Connecticut for seventeen years. The current Docket also states that appropriately incentivizing regionalization has been a goal of the Legislature and DSET since at least 1996. Perhaps it need not be stated, but it is self-evident that the savings that accrue as a result of subsidization leading to increased regionalization are nearly entirely savings to municipal governments, not to the government of the state.

6. Despite its administration for more than seventeen years of the financial incentive program, DSET has taken no prolonged, persistent or continuous efforts to encourage the consolidation of smaller, much less efficient PSAPs. (Only 12% of the state's PSAPs handle an average call volume of greater than four 9-1-1 calls per hour)[5] As pointed out in the current Docket, only two PSAPs have been reduced since 1996. In neither case was action of the state's oversight agency a motivating factor. While it is certain that the Connecticut Conference of Municipalities (CCM) will not support the imposition of disincentives to operate stand-alone PSAPs, no worthwhile outcome is unworthy of debate. For the individual municipalities involved there ought to be a balance between savings to the municipality and objection to disincentives on principle that could be struck if DSET undertook a proactive approach to reducing the number of inefficient PSAPs. DSET is also well-positioned to illustrate to reluctant communities the extent to which technology improvements have reduced the need for dispatchers to possess intimate knowledge of their communities in order to successfully fulfill their

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[2] L.R. Kimball, *Connecticut PSAP ConsolidationFeasibility Study,* December 2011

[3] Kimball, *ibid*

[4] The current Docket attempts to restrict discussion of this topic to subsidies, stating that Capital Grants and Transition Expense programs are outside the scope of this proceeding, yet it is hard to understand the entirety of the State's incentives for consolidation without considering the full range of grants available.

[5] Kimball, *op.cit.*

responsibilities.[6] Perhaps a collaboration between DSET, key leaders in the Legislature and the Connecticut Chiefs of Police Association, which has expressed opposition to such consolidations, would be a worthwhile undertaking.

7. In her recent and very pertinent study, Kodrzycki[7] points out that despite the fact that local government is more fragmented in New England than in the rest of the nation, and that local control has deep historical roots here, there are mechanisms where localities can remain independent but may take advantage of economies of scale by transferring responsibilities for specific municipal services to a consortium of governments, an interlocal cooperative or the like.[8] She reports that Connecticut's PSAPs are the nineteenth most fragmented in the nation on a population basis, fourth most fragmented on an area basis and tenth most fragmented in the nation on the basis of number of governmental organizations in the state, a truly unenviable number even taking into account the large numbers of cities and towns in our state.[9] Kodrzycki further points out that PSAP services exhibit true economies of scale and that there is evidence that in some cases regionalization will lead to improvements in service quality (reduced response time, improved coordination and reduced need for excess capacity underutilized in non-peak demand circumstances)[10] These comments compliment those made by DSET's Consultant who notes that such consolidated Centers also provide service level improvements to the communities they serve through, for example, reduction of transfer of calls between 9-1-1 centers, quicker call processing and dispatch times, improved coordination of resources in multi-jurisdictional incidents, standardized training and reduction of fragmented resource control.[11] Kodrzycki also highlights the elementary observation that for public services that exhibit economies of scale, larger jurisdictions can provide services at a lower cost per user than smaller jurisdictions. Without restating her computational methodology, it should be sufficient for the purpose of commenting on this Docket that she estimates operating cost savings in the neighborhood of 60% of total combined state and local costs would result from consolidating to, e.g., eight RECCs in Connecticut. She is quick to point out that the long term savings in operating costs do not take into account the possible need for significant capital investment and transition grants to effect the consolidations and so they ought to be considered as part of any strategy to rethink subsidy policy.[4] These conclusions raise serious questions about the implication in Paragraph 20. of the Docket that the state did not deliberately make a policy decision that incentivizing regionalization would lead to larger and larger PSAPs. The alternative is to surmise that the state's policy must be to create slightly larger, only slightly more labor-efficient and probably less capital-efficient centers. Connecticut's largest RECC's all have sufficient space and infrastructure investments to accommodate significant growth with incremental capital investment necessary to accept new clients. Given the potential for savings and the possibility of improved service, why wouldn't the state chose to provide greater incentives to create larger PSAPs?

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[6] L. Moore, *Emergency Communications, broadband and the future of 911,* Congressional Research Service Report for Congress, December22, 2010

[7] Y. Kodrzycki *The Quest for Cost-Efficient Local Government in New England: What role for Regional Consolidation?* New England Public Policy Center Research Report 13-1, Federal Reserve Bank of Boston, February 2013

[8] E. L. Glaeser *The Challenge of Urban Policy,* J. Policy Analysis and Management, v.31, Issue 1, p111-122, Reported by Kodrzycki, *ibid*

[9] Kodrzycki,p.10, *op.cit.*

[10] E.T. Wilde, *Do Response Times Matter? The Impact of Response Times on Health Outcomes* Princeton University Working Paper Series, #527, May 2008, and M. Holzer and J. Fry, *Shared Services and Municipal Consolidation: A Critical Analysis,* Public Technology Institute, Alexandria, VA, both cited in Kodrzycki, *op.cit.*

[11] Kimball, *op.cit.*

II. CURRENT FUNDING

8. At the expense of belaboring the points made in the Introduction, Paragraphs 9, 10, 11, and 12 of the Docket all raise different criticisms of the number of PSAPs in our state that could be addressed by a combination of adopting or confirming the policy of incentivizing the operation or creation of larger, more capital-efficient and more labor-efficient PSAPs and having DSET adopt a policy of persistent serious negotiation with the sixty-one stand-alone municipal PSAPs. Such negotiation would have to be accompanied with the wherewithal to offer additional financial incentives proportional to the long-term benefits that would accrue to taxpayers.

9. Regarding the concerns expressed in Paragraph 12., while the state may have missed a chance to limit the number of future PSAPs during the recent deployment of the Public Safety Data Network, another opportunity to implement a policy of PSAP reduction will soon appear when the state begins to deploy the Next Generation 9-1-1 (NG911) call handling software. This is not a trivial matter and may be very difficult to implement, but if there was ever a time to reconsider existing state policy, this may be it.

10. In Paragraphs 16-19 of the current Docket, a retrospective narrative of the evolution of the "C_1" factor is provided. While substantially correct, it misses or, at least, underestimates the difficulties that RECCs encountered during the period in which subsidies were combined with other public safety needs and acted on by both the Executive and Legislative branches with the effect that there was little predictability as to the amount of subsidy that would be available from year to year to operate a critical emergency service function. Accompanying this uncertainty was the inability of the funded PSAPs to provide local governments with accurate funding requests in the absence of certain knowledge of state support levels until, in some cases, the end of the legislative session, thus limiting the ability to obtain supplementary local funding, if needed. There is no question that making subsidies available on a predictable basis made it possible for funded PSAPs to meet obligations to employees, develop electronic infrastructure and provide training in the same fashion as professional PSAPs in other parts of the country. The funded entities are certainly grateful for the stability that the state subsidies have brought to the critical services they provide for the towns and cities they serve.

11. Collection of fees to support 9-1-1 infrastructure and services including subsidization of call receipt agencies is conducted by most states, but the mechanism of expenditure or distribution of such funds varies greatly from state to state.[11] Following statutorily required regulation review Connecticut is free to alter its approach to such subsidization, despite the success of the eighteen-year-old mechanism currently in place. In view of the criticism in the subject Docket and by the Consultant of the existing method and harping on the alleged "bias" it creates, a change is probably necessary. However, while considering abandoning this procedure, a few comments in defense or explanation may be pertinent:

A. Although the common usage of the word "bias" in mathematical references describes a systematic distortion of results due to a factor not allowed for in its derivation, the results produced by the current methodology are exactly those intended when it was proposed over seventeen years ago. That is to say that, in part, there has been a clear intention to subsidize PSAPs that serve more towns to a higher level than those that serve fewer towns. It is entirely plausible to see this mechanism for what it is, i.e., one that has always supported the funding of larger and more efficient PSAPs. After seventeen years of satisfactory operation and time for analysis, the expressed motivations to alter the mechanism seem to be, to a degree, either suspect or disingenuous.

B. It must be remembered that subsidized entities are audited annually to assure that expenditures are directly related to 9-1-1 matters. Excess or inappropriate expenditures are not allowed.

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[11] U.S. Government Accountability Office, Report to Congressional Committees, *911 Services*, April 2013

C. The fact that the current subsidy mechanism provides no upper limit to funding a very large RECC has been known since the outset. Recent excessive concerns on the potential to outstrip the DSET budget leading to suggestions that funding policies might have to be altered seem to be over-reactions. If such a potential were a real concern, it could easily be addressed by a proposal to monotonically reduce the multiplier of the C_1 factor in the subsidy formula so as to approach a budget-protecting asymptote.

E.g.,

For number of municipalities served ($\mathcal{N}$) less than 16, $C_1 = \mathcal{N}$ times 0.2

For $16 < \mathcal{N} < 20$, $C_1 = \mathcal{N}$ times 0.15

For $20 < \mathcal{N} < 25$, $C_1 = \mathcal{N}$ times 0.10, …. , etc.

D. The notion that local governments, in this difficult economy, have their "backs to the wall" when it comes to additional funding of PSAP services and that state subsidies ought to be therefore increased, might be considered in the light of a measure of efficiency, say total cost per call or total cost per dispatch, to determine whether more or less efficient operations are being subsidized.

12. Paragraph 22 of the Docket reflects either a lack of impartiality or of understanding when it states that "it is clear that boroughs have nothing to do with E-9-1-1 or emergency dispatch in this state." Boroughs are municipalities as defined in Title 3-55k of the C.G.S. In the region that QVEC serves there are two boroughs. Both of them operate large fire departments, both previously operated municipal police departments. One operates a municipal electric generating facility and the sewage treatment plant that serves the town in which the borough is located. They are not trivial or vestigial governmental entities. They present to the PSAP exactly as a town does, i.e., their fire departments are dispatched separately, their preplanned responses must be reviewed quarterly, they require special responses to target hazards, they interact with other services in their unique ways, and their residents expect them to respond when they call 9-1-1.

Regarding Special Districts, QVEC also provides 9-1-1 service to a fire district located in a town that operates a small, unsubsidized PSAP. The District does not choose to have its 9-1-1 calls answered by the small PSAP located in their town. The fraction of the municipal count represented by the Fire District's population is credited to our PSAP. We see nothing unreasonable or unfair in this practice. The 9-1-1 surcharges paid by the residents of that District are credited to the subsidized agency that serves them. The alternative is that their surcharges would go to no one.

The implication, in paragraph 23 of the Docket, that a town would purposely divide itself into boroughs or special districts so as to obtain enhanced PSAP subsidies is fanciful given the cost of implementing such a supposed strategy, not to mention the difficulty of convincing the electorate of the rationality of such a suggestion. This and the other bullet points of paragraph 23 are an overreaching justification of the position improperly asserted in paragraph 22.

Regarding any revision of the Regulations, should a municipal count remain part of the subsidy formula, we suggest the following: If a borough operates a public safety agency (e.g., a police department, fire department or EMS agency) it should receive the municipal credit that can be attributed to it; if it does not operate such an agency, it should not receive such credit. This approach will eliminate funding to many MTs but continue subsidies to those that deliver legitimate public safety services.

13. In response to the assertions of Paragraphs 14. and 24. of the Docket that "the subsidy program has been unsuccessful in creating new RECCs or in attracting additional participants to existing regional PSAPs", we wish to point out that this conclusion does not take into account movement of municipalities from one RECC to another. While these movements have been small (5 of 16 in the case of QVEC) they have taken place. The

assertions also do not acknowledge that the hard times of the Great Recession have many more municipalities studying consolidation than has been the case in the past.

More importantly, in a state in which there are 169 separate highway departments, 195 Public School Districts, numerous public health organizations, no shared municipal finance functions and in which the state is now forcing the only consolidation of Regional Planning Agencies and Councils of Government since the 1950's, to imply that it is only the alleged maldistribution of a fraction of under $4,000,000 a year of RECC subsidies that is responsible for inadequate regionalization of PSAPs seems off the mark.

The existing RECC's are the BEST examples of regional cooperation in Connecticut. They have survived between thirty and forty years of cooperation, many of which were years of economic hardship. With greatly appreciated assistance from the subsidies of the 9-1-1 Fund they have provided service that compares favorably with the best 9-1-1 service in the nation. Many of these entities have secured very long term financing (20-40 year terms) as a means of reducing annual operating costs and in the expectation that adequate funding of a critical emergency function will continue. Perhaps the hypothesis that the level of subsidy is not high enough ought to be tested. Certainly no entity should suffer a loss of funding for having successfully regionalized, demonstrated efficient operation and having done all that DSET and their Town leaders asked of them.

14. DSET, like some other parts of state government, is in the difficult position of having to serve as an advocate and promoter of the service for which they have oversight, while simultaneously having to regulate the service. There are times when, despite apparent financial difficulties, such agencies need to do "the right thing." Examples such as funding the acquisition of NG911 software, despite the fact that it reduced significantly the 9-1-1 Fund are pertinent. In this vein, perhaps now is the time to advocate for sufficient funding to support all existing RECC's and to also provide leadership in partnership with the Legislature that will really encourage regionalization.

III. PROPOSED CHANGES

15. The "pooling" proposals of paragraphs 25 and 26 are essentially proposals to modify the distribution function to one based on one half population, one half 9-1-1 call volume. Without some sort of clear rendition of the fund allocation to the proposed pools it is impossible to comment favorably on these proposals. The so-called "pure" bracketing proposal of 26 is entirely unnecessary. If the C_1 variable remains in the formula, a method is proposed above to create a limit on funding for large agencies. It accomplishes in a predictable way what is proposed in paragraph 26.

16. Paragraphs 28 and 29 of the Docket discuss the inclusion of boroughs and special districts in the subsidy formula. Should the C_1 variable remain in the formula we suggest following the proposal of 12. above. This proposal funds these municipalities if they make public safety expenditures and does not fund them if they are not involved with public safety.

17. There are very few special districts that are currently funded. If they have a plausible public safety reason for existing, such as the example in 12., above, they should form part of the municipal count, if that variable remains part of the subsidy formula.

18. Regarding Inquiry 30 of the Docket, which raises the question of whether "n" in the formula should be replaced with the actual value rather than utilizing a floor level of 1. We believe that such a replacement, for all funded entities, is unnecessary and that there may be significant budget issues raised if such a change is adopted for all such subsidy recipients. We suggest leaving "N" to be calculated in the traditional way.

19. Regarding Inquiry 31 of the Docket, which raises the question of whether the additional service credit allocated to towns served by the state police should be dispensed with. The fact of the matter is that for a large

number of towns, primarily those smaller and more rural towns of the state, there is no option for providing police service other than to accept police service from CSP. It is a certainty that CSP will not give up their call receipt and dispatching function to another agency. Under these circumstances reducing the C_2 value for these towns would be tantamount to imposing a permanent penalty on their PSAP through no fault of their own.

As a practical matter, although no direct dispatch is provided, transfer of a call to CSP nearly always results in the dispatcher staying on the line so as to get early warning of the need to dispatch fire or ambulance units to an emergency being reported to police. These calls thus result in additional time expenditure for nearly all CSP calls.

20. In those situations such as described in Paragraph 32 of the Docket, in which the possibility of eliminating the population count in addition to eliminating 50% of the "C_2" credit is raised in those cases where police department calls are transferred to a municipality, we would prefer to see an aggressive effort made by DSET to eliminate situations where local police departments are not dispatched by the RECC. The significant subsidy reduction already incurred by the PSAP in those cases should not be exceeded. Pressure needs to be brought by DSET on the municipality, not on the PSAP.

21. Regarding Phase-in of funded agencies as discussed in Paragraph 33 of the Docket, we have previously commented on the long-term funding obligations of several of the RECCs which speaks against rapid changes in funding levels. We support a phase-in over a four to six year time frame of all basic funding changes, both decreases and increases. In our part of the state we still have four municipalities that have yet to adopt budgets after three referenda and with tax increases not exceeding 2%. Making up reductions in state subsidies will not be easy.

22. G. Pohorilak has proposed an alternate calculation of subsidies that eliminates the disparaged C_1 variable and is based on utilizing only budget and 9-1-1 call data. While we believe that changes could be made to the current formula to reduce the funding of large centers so as to reduce the effect that has been inappropriately termed a "bias" and while we believe that Connecticut's 9-1-1 program ought to have significant attention directed to reducing the number of less efficient stand-alone municipal PSAPs, we are supportive of his proposal. As noted, we would prefer to see, consistent with our comments above, both subsidy increases and decreases phased in so as to have a beneficial effect on total costs. Further, we believe that it will be necessary to provide for estimation of costs and per capita call data when a new municipality joins an existing funded entity or when a new funded entity is created. It should be noted that the spreadsheet attached to Mr. Pohorilak's proposal, while illustrative of the method, is based on 2011 expense data. For purposes of completeness a copy of Mr. Pohorilak's spreadsheet is attached hereto following page 8, but we are relying on the text of his submission for a complete explanation.

23. It is no surprise that the ability of Connecticut's towns and cities to absorb additional governmental expense varies greatly. In our state municipalities rely on the local property tax to fund 72% of municipal expenditures. However the equalized grand list per capita varies from a low (2010 data) of $54,508 to a high of $719,183. To ignore the greatly varying impact of additional expenditures on Connecticut's towns is to ignore the reality of our state's financial plight.[12]

In the state's largest and longest-running municipal subsidy program, the Educational Cost Sharing program administered by the State Department of Education, a major factor applied is an expression of the community's ability to pay additional expenses. This factor is the AENGLC (Adjusted Equalized Net Grand List per Capita). It takes into account the Grand List, population and Per Capita Income of the Town. If the population-weighted AENGLC data is compiled for each of the RECCs and the per cent above or below the mean is calculated, one

[12] Challenge of Funding Local Government in Connecticut, CCM presentation to MORE Commission, 3/26/13 www.slideshows-net/challenge-of-financing-local-government-in-connecticut

obtains the following results: KX -13.21%, GFA -13.67%, LCD 37.00%, NWPS 28.4%, TN -24.7%, QV -48.3%, VSECI 78.4% . We believe that it is reasonable to apply some sort of correction to subsidies based on this factor to account for the ability of the region to pay for these basic services. We are not suggesting a specific adjustment but we ask that DSET take the wide disparity in this data into account.

24. We are unable to comment on the Initial Regulatory Flexibility Analysis until it is provided by DSET and wish to reserve the right to comment when such analysis is available.

Respectfully Submitted,

QUINEBAUG VALLEY EMERGENCY COMMUNICATIONS, INC.

Jeffrey B. Otto

Jeffrey B. Otto, President

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June 24, 2013

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 EXPENSES	ACTUAL CALLS/CAP	STATE MEDIAN#	CAP# USED	A P.CAP x EXP.	2013 STATE $	B PLUS 40% OF DIF	A+B 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

6/21/2013