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June 21, 2013

DSET Docket 13-01

Department of Emergency Services and Public Protection

1111 Country Club Road

Middletown, CT 06457

DSET:

The towns of the Valley Shore Emergency Call Center appreciate the opportunity to comment on the proposed changes to DESPP regulations regarding the subsidization of regional public safety emergency communications centers, multi-town centers, and eligible municipalities. We strongly support the continued review of this formula and concur with the findings of the recent Kimball report and subsequent findings of the Statewide Enhanced 9-1-1 Commission on inequities in the current subsidies.

As members of the Valley Shore regional system, we have witnessed a growing disparity in funding to regional centers statewide. Other regional systems with call volumes similar to that of Valley Shore receive many times as much state funding as we do. As a consequence, fees to member towns are significantly higher, and our budgetary constraints significantly tighter, than those of other systems.

Below is our response to the specific questions posed by DSET:

Paragraph 25: Any measure that closes the gap between highly funded and underfunded centers should be considered. The definitions of *calls* and *population* should be reconsidered. Our area has a massive seasonal fluctuation in population that is not reflected in the current formula.

Paragraph 27: "Pure" bracketing deserves further consideration, as it would alleviate the substantial financial impact of the departure of one town from a regional system, which triggers a loss of State funding as well as the loss of regular income from the direct town fee and causes a large increase in fees for other remaining member towns.

Paragraph 28: We support the removal of boroughs from the count if a town count continues to be part of the formula, since the boroughs are effectively just neighborhoods within the towns for the purpose of emergency response.

Paragraph 29: Please provide clarification on what constitutes a “special district.”

Paragraph 30: We support a formula that places a higher value on the number of 9-1-1 calls. In a region such as ours, with a high influx of summer residents, this change would more accurately reflect the demand on the call center.

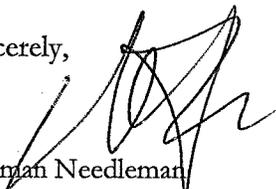
Paragraph 31: We oppose removing the c2 value. Referral of calls through the State Police does not substantially lessen the service required of the PSAP.

Paragraph 32: We need further information on this change in formula.

Paragraph 33: We support immediately implementing funding increases to mitigate current inequities. We believe it would be possible to do this while holding harmless those PSAPs that would experience funding reductions under a new formula.

We applaud the effort of the Department of Emergency Services and Public Protection to “provide for the fair and equitable distribution of available subsidy funds.” Our comments indicate our view on the way that aim can be achieved. And we believe that, with appropriate support, Valley Shore can be a model of the kind of regional PSAP that DESPP seeks to encourage.

Sincerely,



Norman Needleman
Member of the Board of Directors
Valley Shore Emergency Call Center

for the member towns of the VSECC