Before the
DEPARTMENT OF EMERGENCY MANAGEMENT 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	)	

REPLY COMMENTS OF QUINEBAUG VALLEY EMERGENCY COMMUNICATIONS, INC.

For purposes of clarifying typographical errors contained in its comments on the subject Docket, Quinebaug Valley Emergency Communications Inc. (QVEC) wishes to submit these Reply Comments.

1. At 11.C. of its Comments, submitter outlines a mechanism that may be used to: a. protect the DSET budget upper limit and, b. limit the maximum subsidy for which a very large RECC might qualify, as follows:

> 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 C1 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, C1 = $\mathcal{N}$ times 0.2
>
> For 16 < $\mathcal{N}$ < 20, C1 = $\mathcal{N}$ times 0.15
>
> For 20 < $\mathcal{N}$ < 25, C1 = $\mathcal{N}$ times 0.10, ... , etc.

To clarify that the intent thereof is to provide for monotonic reduction of the multiplier of variable C_1, this should be more clearly stated as follow:

> 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 C1 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, C1 = $\mathcal{N}$ times 0.2
>
> For 16 < $\mathcal{N}$ < 20, C1 = 15 times 0.2 plus ($\mathcal{N}$-15) times 0.15
>
> For 20 < $\mathcal{N}$ < 25, C1 = 15 times 0.2 plus 5 times 0.15 plus ($\mathcal{N}$-20) times 0.10, ... , etc.

2. At 18. of its comments, submitter advocates no change in the manner in which variable "n" is calculated, as follows:

> 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.

An upper case "N" was inadvertently substituted for the lower case "n" in the last line of this paragraph. The paragraph should be restated as follows:

> 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.

3. At 19. of its comments, submitter inadvertently inserted a period in the second line of the paragraph, erroneously creating two sentences, as follows:

> 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, ….

The period should be replaced with a comma, changing the ending of the first sentence, as follow:

> 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, ….

Submitter regrets any inconveniences or misunderstandings caused by its faulty submission and requests that all interested parties make the corrections shown above.

Respectfully Submitted,

QUINEBAUG VALLEY EMERGENCY COMMUNICATIONS, INC.

Jeffrey B. Otto

Jeffrey B. Otto, President

1249 Hartford Pike
East Killingly, Connecticut 06243
860-412-1491

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