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March 10, 2015

Department of Emergency Services & Public Protection
Division of Statewide Emergency Telecommunications
1111 Country Club Road
Middletown, CT 06457

RE: DSET Docket No. 13-01

I am submitting this comment letter in support of the proposed changes to the State subsidy funding for regional Public Safety Answering Points.

As the Treasurer of the Colchester Emergency Communications regional PSAP, I have had to struggle with the disparities in the State subsidy that results in significant inequalities unrelated to either populations served or to the call volumes or workloads existing between the regional PSAPs. As one of the lesser funded PSAPs, it has been impossible to provide a budget to the towns served that can compete with the bargain rates that can be provided by the PSAPs receiving a far greater percentage of their operating budget from the State. Due to that disparity, we have had towns move to a PSAP with a greater percentage of their operating budget covered by the State subsidy, thereby reducing the financial impact to that town. Unfortunately, that imposes a much greater financial burden on the remaining towns.

For whatever reasons in the past that created the current funding formula which is heavily weighted on numbers of towns, boroughs, and special tax districts, it is time to correct it and base the subsidy on call volume and populations, as the proposed formula does. The population component alone better represents the extent of coverage than the number of towns, boroughs and tax districts. And, the call volume is a good measure of the respective workloads.

These disparities in funding levels were well identified in the Kimball Study. The State 9-1-1 Commission has agreed with the Kimball Study and has proposed changes to the funding formula in its NPRC, Docket 13-01. Examples set forth in the DSET NPRC document point out that centers with nearly equal populations and call volumes can receive vastly different funding from the State (*Docket page 4, item 15: a \$300,000 variance*). The imbalance creates dramatically different percentages of support, even where operating budgets are virtually equal. (*Docket page 5, figure A: a 76% - 11.9% variance*).

A balanced, fair and unbiased State subsidy formula for regional PSAPs will help to balance the budget equitably across all municipalities and allow all PSAPs to continue to provide service to First Responders and the residents they protect.

I strongly urge that this regulatory change be forwarded to the Regulatory Committee, and ultimately supported by the Legislature, as written.

Thank you,



Douglas Knowlton

Treasurer

Colchester Emergency Communications