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

Re: DSET Docket 13-01

To Whom It May Concern:

Nearly twenty years ago, the state of Connecticut Office of Statewide Emergency Telecommunications released a strategy that called for the regionalization of the Public Safety Answering Points (Dispatch Centers) in the state. The belief was that a consolidation of these centers would not only bring financial savings but also increase the efficiency of the PSAPs which would in turn provide a higher level of services to the residents and visitors of the state.

In order to drive the pursuit of consolidated regional PSAPs, the OSET (now DSET) constructed a funding formula that gave subsidy to the regional centers which resulted in lower costs to the municipalities that chose to regionalize. Additionally, capital grants were offered to the regional PSAPs as a way to insure critical infrastructure and equipment could be kept up to date. As a result of a belief in the state strategy, combined with the efficiency and cost savings, 20 towns in the Northwest corner of Connecticut have joined to form a regional Dispatch Center (Litchfield County Dispatch).

In 2011, the state of Connecticut contracted with a consultant (L.R. Kimbal) to review and make advisement on the longer-term strategy for emergency telecommunications in the state. The result of their analysis determined that the state was on the right track with the consolidation efforts and proposed a plan that would accelerate the transition from many individual and few regional PSAPs to a full-regional concept. Their findings were based on the same philosophy that had been in place for nearly two decades....both operational efficiencies and lower costs would be achieved in a regional consolidated approach.

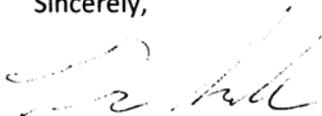
In 2014, without reasonable explanation, the state Department of Statewide Emergency Telecommunications announced that they were proposing a change in the funding formula that determines the subsidies to the regional dispatch centers. The current formula uses number of municipalities served, population, and call volume to determine the subsidy. The proposal was to eliminate the number of municipalities served element and base the funding solely on the number of 911 calls received by each regional center and the population they serve. Because of the small rural towns served by Litchfield County Dispatch, this new formula would cause a significant reduction in state subsidy that will result in significant additional costs to each of the 20 municipalities LCD serves.

Aside from the obvious financial burden that would be put on Northwest Connecticut municipalities, we believe the proposed formula has many flaws:

- The credit for the number of municipalities should not be removed as a formula factor as we firmly believe there is a significant reduction in the incentive for smaller towns to regionalize with this removed.
- There is no cost savings noted in the proposed change, only a shift in funding from the 3 larger regional PSAPs (that cover 30% of the municipalities in the state) to the 3 smaller regional PSAPs (that cover less than 15% of the municipalities in the state). The new formula would remove approximately \$659,000 from the three large regional centers and give approximately \$561,000 to the three smaller regional centers.
- The new formula offers no incentive for the 23 individually funded larger municipalities to regionalize, as the subsidy they currently receive would be higher than if they joined a regional PSAP. This is directly in conflict with the strategy and the recommendations of the Kimbal analysis.
- The formula as proposed is missing critical elements. The workload of a regional dispatch center is not solely determined by the 911 call volume or the population. LCD receives 30,000 911 calls annually. It also receives nearly 80,000 calls for assistance on ten-digit non-emergency lines. This heavy call volume is a result of dispatching a municipal police department (Torrington) and should be considered in the new formula.
- Although a change in formula was a recommendation of the Kimball analysis, the regional dispatching of police departments was not included in their analysis as none of the regional PSAP were currently dispatching municipal police at the time of the project.

Over the last twenty years, the strategy of consolidation and regionalization of the state of Connecticut Public Safety Answering Points has proven to be an effective, efficient strategy with significant cost savings realized by the towns that regionalized. The incentives offered through fair subsidies have encouraged more than 44% of the state's municipalities to regionalize. The current system works. The small communities of Northwest Connecticut work hard to provide an affordable quality of life to its residents. They have proven the regional approach works and have followed the state's strategy that was confirmed by a recent third party analysis. The proposed change in funding formula is not fair, has not been thoroughly completely vetted, and if you must change the formula it should not penalize municipalities that regionalized into the larger PSAPs for being successful and adhering to the state's strategy.

Sincerely,



Daniel Soule
Executive Director
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