

**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 THE NEW BRITAIN PUBLIC SAFETY TELECOMMUNICATIONS CENTER

1. The City of New Britain supports the proposed change to the regulations pertaining to the funding of regional public safety answering points. While we believe that regional dispatch operations are vitally important to the communities they serve, the level of subsidy they receive is disproportionate. Without question, regional centers are positioned to apply the state subsidy to a greater portion of their annual budget than most municipally operated centers and in particular, those of the state's eight largest cities. This is an unintended consequence of a complex formula developed almost two decades ago.
2. Despite the significant financial incentive for regionalizing PSAP operations, very few municipalities have elected to join or create such centers. While there have been changes in small local PSAP operations, most have been changes from one regional center to another. There has been no change in the ability of larger dispatch centers to regionalize with their neighbors despite numerous studies and work efforts in that regard. The large cities continue to have a significant calls for service overburden that will likely continue for an extended period. That overburden is reflected in the higher property taxes in effect in the larger cities.
3. The City of New Britain is willing and able to join and host a regional PSAP in the Central Connecticut area of the state. We continue to believe such an operation would have benefits not only for New Britain but for the communities who would join with us.
4. The City of New Britain PSAP is the only municipal host hub on the State of Connecticut fiber network and it is the only municipal host of a Next Generation 9-1-1 aggregation switch. While we are pleased to offer this space to our state technology partners, the expenses associated with doing so are becoming burdensome. The state's equipment occupies about 20% of our server facilities. That equipment is dense, hot, and power thirsty. We have been compelled to provide additional HVAC and electrical service, including UPS service, to assist in hosting this equipment. We also are vigilant in providing security and monitoring services for the server facilities. We believe that these efforts should be reflected in the subsidy formula. We would suggest that our subsidy be increased by 25% to reflect both the capital costs as well as the operating costs associated with our hosting of these services.

Sincerely,



James P. Donnelly
Director
City of New Britain Public Safety Telecommunications Center