



neccog

ashford - brooklyn - canterbury - chaplin - eastford - hampton - killingly - plainfield -
pomfret - putnam - scotland - sterling - thompson - union - voluntown - woodstock

March 12, 2015

The Honorable Dora B. Schriro
Commissioner, Department of Emergency Services and Public Protection
Division of Statewide Emergency Telecommunications
1111 Country Club Road
Middletown, Connecticut 06457

Re: Notice of Proposed Regulatory Change - DSET Docket 13-01

Dear Commissioner Schriro:

The Northeastern Connecticut Council of Governments (NECCOG), after review of the proposed changes (DSET Docket 13-01) to the Department of Emergency Services and Public Protection Division of Statewide Emergency Telecommunications 911 funding regulations is deeply concerned as to their adverse impact on our region. Accordingly, we are opposed to the changes as proposed and request that they be withdrawn.

Our region is a strong supporter and practitioner of regionalism. The General Assembly has also embraced regionalism as a means to reduce fragmentation in the delivery of services; creating greater efficiencies and cost savings. The current number of PSAPs is excessive and we share the Department's efforts to encourage consolidation of the 911 centers. In our view the state would be well served to replicate the regional system employed in the northeastern and northwestern regions of our state. The NECCOG region has been well served by Quinebaug Valley Communications since it was founded in 1974. They have been a model of regionalism in this predominantly rural area of Connecticut. Unfortunately, the proposed change to the funding formula moves our state in the opposite direction - encouraging fragmentation instead of regionalization. The additional result of the proposal is a new unfunded mandate to the towns of NECCOG. The proposed changes for the three largest regional PSAPs (which includes QVEC) directly impacts nearly thirty-percent of Connecticut's municipalities. The collective reduction in funding is more than \$659,000 per year. QVEC stands to lose \$165,000. All of this will have to be made up by our towns - which are already under considerable fiscal challenges. In our view, any change in the funding formula should not penalize regional/efficient operations like QVEC and at the very least maintain the current level of funding.

In terms of the proposed funding formula, NECCOG associates itself with the detailed remarks made to the Docket by QVEC. It appears clear from their testimony that the DSET/DESSP funding proposal is not one which will foster regionalization and will harm the existing and efficient regional PSAPs. Again, the state should use the funding formula to incentivize regional PSAPs and not harm those that are practicing the regional delivery of services.

Thank you for your consideration of our position. Should you need additional comment or information, please do not hesitate to contact us.

Sincerely,

John Filchak
Executive Director

cc: NECCOG membership and Legislative Delegation