

**Before the
DEPARTMENT OF EMERGENCY SERVICES AND PUBLIC PROTECTION
DIVISION OF STATEWIDE EMERGENCY TELECOMMUNICATIONS
Middletown, CT 06457**

In the Matter of)
)
Proposed changes to DESPP regulations regarding)
the subsidization of regional public safety) DSET Docket No. 13-01
emergency telecommunications centers, multi-)
town PSAPs and eligible municipalities)
)

NOTICE OF PROPOSED REGULATORY CHANGE

Released: May 28, 2013

Comment Date: June 24, 2013

Reply Comment Date: July 29, 2013

NOTE: This NOTICE is released for the purpose of soliciting public input prior to the creation of proposed regulations. The process described within is not, and does not replace the regulatory creation process required in C.G.S. Chapter 54.

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I. INTRODUCTION

1. In this *Notice of Proposed Regulatory Change (NPRC)*, we propose to change the calculations used to determine the subsidy level for Public Safety Answering Points (PSAPs) in order to implement specific recommendations of the *Connecticut PSAP Consolidation Feasibility Study*¹ (the *Study*) which was commissioned by the Division of Statewide Emergency Telecommunications² (DSET) at the direction of the Enhanced 9-1-1 Commission. This action is intended to provide for the fair and equitable distribution of available subsidy funds, and encourage the creation of regional PSAPs³ of all sizes. We solicit comment on all aspects of this proposal to serve our role of providing the best possible 9-1-1 service to the visitors and residents of Connecticut.

2. The *Study* explained that over the past several years, Connecticut's 9-1-1 revenues have declined – due in part to a shift in consumer communications technology preferences from landline services to mobile services. There is a need to reexamine existing funding provisions to ensure that all funding provided to PSAPs is used to its best advantage – particularly with regard to regionalization and other statewide initiatives. Thus, in the interest of adequately funding the existing regional communications centers, supporting new regionalization initiatives and ensuring that DESPP can meet all of its statewide obligations and initiatives within expected revenue levels, DSET asked L.R. Kimball to examine the current funding formulas and make recommendations in the *Study* to ensure fairness across the board and to appropriately incentivize the regionalization that has been the goal of the legislature and this agency since the time when the subsidy legislation was first signed into law.

3. After receiving the *Study*, the Chairman of the Enhanced 9-1-1 Commission established a subcommittee with the charge to examine the issues, meet, confer and report back to the full Commission with their recommendations for any actions the Commission should take. The subcommittee delivered their report at a special meeting of the Enhanced 9-1-1 Commission on December 14, 2012.⁴ The Commission subsequently asked DSET staff to investigate the “regional funding formula” and develop alternatives for potential adoption.

II. BACKGROUND

4. Currently, a statutory and regulatory scheme is in place which provides a program for “*the subsidization of regional public safety emergency telecommunications centers, with enhanced subsidization for municipalities with a population in excess of forty thousand.*”⁵

5. The current regulatory landscape originated after the work of a 1996 legislative task force⁶ (*Task Force*) was adopted into statute and regulation. The *Task Force* studied funding for operational and capital expenditures for enhanced 9-1-1 service and the establishment of more regional communication centers. This regulatory scheme was expanded after the report of the Enhanced 9-1-1 Commission Subcommittee on Funding was delivered in December of 2004. The expansion included the adoption of a subsidy plan for State Police PSAPs,⁷ reimbursement of capital expenses for PSAPs, and the reduction of

¹ L. R. Kimball, December 2011

² Formerly, the *Office of Statewide Emergency Telecommunications*

³ “Regional PSAP” means an entity responsible for the receipt and processing of 9-1-1 calls for at least three municipalities. Compare to “Multi-Town PSAP”, which is an entity responsible for the receipt and processing of 9-1-1 calls for two municipalities.

⁴ The subcommittee findings are included in *Annex A* of this document.

⁵ General Statutes of Connecticut (the *CGS*), Chapter 518a, §28-24(a)(2)(B)

⁶ The task force was established pursuant to Public Act No. 95-318

⁷ Codified in the Regulations of Connecticut State Agencies (the *Regulations*), §28-24-13 (effective March 2006)

the population threshold for funded municipal PSAPs from 70,000 to 40,000.⁸

6. State Agencies are responsible for the creation of regulations required for the operation of their agency or the services they provide. Connecticut's Uniform Administrative Procedure Act specifies the procedures to be followed when promulgating regulations.⁹ DSET has chosen this NPRC format for soliciting input into the regulatory process in order to enable the widest possible participation by the stakeholders, provide sufficient time for thoughtful comments, and also provide sufficient time for reasoned reply comments in a transparent environment. We have deliberately adopted a modified form of the U.S. Federal Communications Commission's Notice of Inquiry/Notice of Proposed Rule Making processes for this effort, because it is a widely-understood process that does not require re-invention. It is the ability to accept reply comments on a set schedule that we see as the most attractive aspect of the NPRC process, as compared to the public meeting alternative. The NPRC process removes the need for issue advocates to be prepared to respond to proposals immediately in a public meeting without the ability to research the particular issue involved, or to confer with their constituency.

7. However, the NPRC process does not substitute for the regulatory creation and review process required by statute.¹⁰ Proposed regulations crafted by DSET after this proceeding is concluded will remain just that – *proposed* regulations, which will be submitted into the process that all regulation from DESPP undergoes.

III. CURRENT FUNDING

8. There are several different PSAP funding programs currently in effect. The subsidy program, which rewards multi-town and regional PSAPs, as well as municipalities with populations greater than 40,000 is the subject of this proceeding.¹¹ The formula used to calculate the subsidy payment is set by regulation¹² and expressed as:

$t = ((p*n) * (c1 c2)) * b$, where:

t is the subsidy payment;

p is the aggregate population based on the most recent population figures from the Department of Public Health;

n is the percent above the state median number of 9-1-1 calls received, the value of which cannot be less than 1

c1 is a variable based on the number of municipalities a PSAP serves multiplied by .2; and

c2 is a variable based on the number of emergency services (police, fire or EMS) dispatched for each municipality a PSAP serves, e.g.:

- .025 for one service
- .050 for two services

⁸ Public Act No. 05-181

⁹ "Regulation" means each agency statement of general applicability, without regard to its designation, that implements, interprets, or prescribes law or policy, or describes the organization, procedure, or practice requirements of any agency. (CGS Chapter 54, §4-166)

¹⁰ CGS Chapter 54, §4-166 through §4-189g, inclusive.

¹¹ The other funding programs, including the Capital Grant and Transition Expense programs, are outside the scope of this proceeding.

¹² Regulations §28-24-3(j)

- .100 for all three services

b is the funding base, currently \$2.02

9. The subsidy program was designed to encourage regionalization of PSAPs in Connecticut. It was recognized 17 years ago that “Connecticut, with more PSAPs per capita than virtually any other state in the nation would be equally or better served by far fewer dispatch centers.”¹³

10. On average, 51% of the state’s PSAPs receive less than one 9-1-1 call per hour.¹⁴ In 37% of the PSAPs, the PSAPs receive between one and four 9-1-1 calls per hour or a maximum of one call every 15 minutes. This is an average that assumes equal distribution of calls around a 24-hour clock (in reality, the per-hour call volume will be lower during some hours and higher during others).

11. Only twelve percent of the state’s PSAPs handle an average call volume of greater than four 9-1-1 calls per hour. When the emergency communications workload is as low as seen in these PSAPs, the effective processing of 9-1-1 calls and the associated dispatch activities become a very small portion of the daily duties performed by the PSAP staff. This environment reduces the focus on effective delivery of emergency communications.¹⁵

12. The cost to the State of critical systems such as E9-1-1 call answering positions, servers and switches, and the cost to the municipalities for personnel and for the equipment and services that they are responsible for (e.g., real estate, utilities, radio consoles, computer-aided-dispatch and logging systems) is disproportionately high when compared to the actual workload associated with emergency communications, including 9-1-1 and the associated dispatch functions.

13. The Task Force report made the critical assumption that “*given an opportunity and sufficient subsidy, local communities will consolidate their public safety telecommunications operations.*”¹⁶

14. However, the now 17-year old subsidy program has been unsuccessful at creating new regional PSAPs, or attracting additional participants to existing regional PSAPs.¹⁷

15. The subsidy program, in its current form, has an inherent bias built in: even if the population served is roughly equal, regional PSAPs with more towns are funded at a significantly higher level than regional PSAPs with fewer towns. For example, one regional PSAP serves eight municipalities with a population of 67,267 and was budgeted to receive \$357,923.94. Another regional PSAP serving 21 municipalities with a roughly equivalent population of 62,213 was budgeted to receive \$658,014.46.¹⁸ Although the first PSAP served about 5,000 people fewer than the second PSAP, it received \$300,000 more. The c1 variable is the factor that causes this funding disparity.¹⁹

16. The reasoning for creating the bias appears to be have been twofold: first, to create a funding structure that substantially replaced the 9-1-1 system’s reliance – and for the purposes of this discussion, specifically the regional PSAPs’ reliance – on legislative grants to fund 9-1-1 services, and to provide additional incentives to Towns to regionalize.

¹³ Task Force to Study Enhanced 9-1-1 Telecommunications Services (Task Force), Executive Summary (February 20, 1996)

¹⁴ Connecticut PSAP Consolidation Feasibility Study (Study), L.R. Kimball, December 2011, Section 3, pp. 13-14

¹⁵ Ibid

¹⁶ Task Force, p. 6, “Critical Assumptions”

¹⁷ 108 PSAPs in 1996 have only been reduced to 106 by 2013.

¹⁸ Fiscal year 2010 – 2011 budget.

¹⁹ Study, Section 5.3, pp. 75-76

17. With regard to replacing the annual legislative program, regardless of whether or not the *Task Force* succumbed to what they referred to as the “*enormous temptation to try to fit the calculations to parochial and narrow agendas or to try to retrofit past practices into a new formula,*”²⁰ plainly, the new subsidy formula did completely replace the then-existing state funding for the larger regional PSAPs but short-changed the smaller regional PSAPs (*see Figure A following*).

Figure A: Implementation of Subsidy Program, 1997²¹

Regional PSAP	FY 95-96 Budgets	FY 95-96 Funding	New Funding	Percent Change	Prev. fund Budget %	New fund Budget %
Tolland County	449,754	164,000	191,171	16.6%	36.5%	42.5%
Quinnebaug Valley	242,140	115,200	185,629	61.1%	47.6%	76.7%
Litchfield County Disp	503,900	119,360	160,733	34.7%	23.7%	31.9%
Colchester ECC	440,910	138,960	91,855	-33.9%	31.5%	20.8%
Willimantic Switchboard	400,700	90,400	87,474	-3.2%	22.6%	21.8%
Valley Shore ECC	454,582	112,720	85,779	-23.9%	24.8%	18.9%
Northwest Public Safety	484,569	167,280	57,467	-65.6%	34.5%	11.9%

18. With regard to additional incentives to Towns to regionalize, the *Task Force*, in creating the public policy objectives for the subsidization program, stated that “*Consolidated, regional public safety communications centers provide an efficient and cost effective means of delivering emergency public safety telecommunications services. Existing centers should be supported. Towns and cities operating standalone public safety answering points should be encouraged to regionalize or form joint ventures with neighboring communities.*”²²

19. Given those requirements, which included replacing the reliance on annual appropriations from the legislature for the funding of the existing regional PSAPs, it is understandable how the c1 variable was given the weight it now has.

20. Nevertheless, the situation now exists that, given two regional dispatch centers – one very large, and one with half the number of communities as the first, a new community joining the larger regional PSAP will cause the larger PSAP’s subsidy to increase much more than that same community joining the smaller regional PSAP. Not only is that outcome not equitable, but it skews the incentives in regionalization towards larger and larger PSAPs, which is a policy decision that the state did not deliberately make.

21. The *Study* noted that, “while [an increase in] the number of municipalities increases the number of dispatchable resources, it is not the number of towns and dispatchable resources that determine how busy a PSAP is; call volume and the number of resulting dispatches are what determine how busy a

²⁰ *Task Force*, p. 9, Section D – Funding Model

²¹ Figures are approximate, are based upon *Task Force* work, and cross two budget years. Boroughs are not included in the calculations.

²² *Task Force*, Policy Objectives, pp. 1-2

PSAP is. [While] it is good policy to provide regional PSAPs with additional funding, it is the dramatically disproportionate level of funding that becomes the focus.²³

22. It is also clear that boroughs have nothing to do with E9-1-1 or emergency dispatch in this state, yet they are also counted in the c1 variable. The issue of boroughs – or special districts²⁴ – being part of the c1 variable was never discussed in the 1996 Task Force report, nor in the 2004 Subcommittee report. Counting boroughs in the formula skews the incentives for regionalization since, from a regional PSAP point of view, there is an incentive to approach a municipality which contains a borough, rather than one that does not, because it pays more – for no additional workload or resources expended.

23. Other unintended effects resulting from counting boroughs and special districts in the c1 variable include:

- The penalty inflicted on any municipalities of over 40,000 population²⁵ which also contain a borough, because as an unwitting “multi-town” they are ineligible for capital grants that would otherwise be available to them.
- Conversely, the benefit afforded to municipalities which contain a borough and which join with one other town and thereby become a “regional” PSAP, now eligible for capital grants for which they otherwise would be ineligible.
- The benefit afforded to towns which, by splitting their town into response districts, receive enhanced funding from DSET.

IV. PROPOSED CHANGES

24. Since it is evident that the subsidization program has not achieved the stated public policy objective²⁶ of reducing the number of PSAPs, we propose that the formula be changed so that it does not create the outsized incentives for very large PSAPs to add single towns to their membership; and to provide additional incentives to attract new municipalities. To this end, we invite comment on the following questions.

25. Should we adopt a plan which creates “pools”? In Massachusetts, additional funding is provided to regional PSAPs through an incentive grant program. Massachusetts has categorized regional PSAPs based on the number of municipalities served into “pools.”²⁷ The incentive grant program allocates a statutorily mandated percentage of the prior fiscal year’s surcharge revenues to each pool: The surcharge revenues allocated to each pool are distributed to the PSAPs in the pool based on their individual call volume and population. Call volume for each PSAP is calculated as a percentage of the state’s total call volume. The population served by each PSAP is calculated as a percentage of the state’s total population. These two percentages are added together and then averaged, and on that basis incentive funding is awarded.

²³ Study, Section 5.3.1.1, p. 75

²⁴ Examples of special districts are the Putnam Special Services District and the Groton Long Point Association Special Tax District.

²⁵ An example is the City of Milford

²⁶ Task Force, Policy Objectives, p.1

²⁷ The pooling concept applies in states that sort counties into “classes” of groups based on population range; a maximum 9-1-1 surcharge rate is established by statute for each class or population category.

26. The Massachusetts system is actually a blend of call-volume-driven bracketing and population count, without a town count component, and therefore it removes the c1 variable effect. There is significant flexibility built into that funding model. The grant award is based on the prior year's actual revenues, so the amount that PSAPs receive adjusts annually, even though the relative percentages remain the same.

27. Or, should we adopt a "pure" bracketing concept that keeps the "town count" c1 variable in the equation, but with the proviso that the c1 increase will not occur until specific thresholds are passed? For example, with a bracketing system that works in increments of five, a regional PSAP has 22 member municipalities and adds a new town for a total of 23. The regional PSAP subsidy goes up by only the amount attributable to the other elements in the formula. When additional towns are added that bring the total to 25, the c1 variable would then be changed to reflect the full amount. Conversely, if a town leaves a regional PSAP, the c1 variable would not change until the threshold was passed, though the population and service counts would go down.

28. In the event the "town count" c1 variable is retained in some form, should boroughs be removed from the c1 variable count?

29. Should special districts be removed from the c1 variable count?

30. Should we place a higher value on the actual number of 9-1-1 calls answered at the regional PSAP? This could be accomplished by increasing the weighting of "n", which is where 9-1-1 call volume enters the equation. Asked another way, should the minimum value of "1" be removed, so that the calculation reveals the true value of the 9-1-1 calls being answered?

31. We penalize eligible municipalities who do not provide full services in their PSAPs.²⁸ Should the additional c2 value given to Resident Trooper towns in order to make the formula calculation for their regional PSAPs identical to full-service PSAPs be removed, to fairly reflect the fact that transfers are occurring and full service is not being provided?

32. Should we change the formula to credit neither the additional c2 value nor the population count for a municipality which maintains its own police department and its own police dispatch, is a member of a regional PSAP which answers its 9-1-1 calls and transfers those police calls back to the municipality, to once again fairly reflect the fact that transfers are occurring and full service is not being provided?²⁹

33. For any of these options, should we consider a "phase-in" period to allow the regional PSAPs additional time to adjust to new funding levels?

V. INITIAL REGULATORY FLEXIBILITY ANALYSIS (IFRA)

34. The "regulations affecting small businesses" section of the Uniform Administrative Procedure Act³⁰ (UAPA) requires the preparation of the Small Business Impact Statement and Agency

²⁸ "However, the task force believes that the cities must take stronger initiatives in consolidating their dispatch operations to achieve efficiencies. Hence, our recommendation and proposed formula is tempered from the perspective that while we strongly urge subsidies to account for the overburden; we provide strict sanctions for the absence of consolidated urban dispatch centers where they exist." —*Task Force, Recommendations "B"*, p. 8; codified at *Regulations* §28-24-3(j)(4)(A)

²⁹ Currently, partial credit is given in such situations, although DSET policy does not permit any changes which would result in additional PSAPs being funded.

³⁰ CGS, Chapter 51, §4-168a

Fiscal Estimate of Proposed Regulation. As this NPRC is a preparatory document for the purpose of soliciting input prior to the creation of proposed regulations, the IFRA cannot be provided at this time, but will be created along with any proposed regulations at the end of this NPRC process.

35. Arguably, as any change to the subsidy calculations will affect those PSAPs that meet the statutory definition of a small business under UAPA, we invite public comment on IFRA issues that may impact PSAPs, in accordance with the same filing date deadlines as comments filed in response to this NPRC as listed on the first page of this document.

VI. COMMENT PERIOD AND PROCEDURES

Interested parties may file comments and reply comments on or before the dates indicated on the first page of this document. All filings related to this Notice of Proposed Regulatory Change should refer to DSET Docket No. 13-01.

Reply comments must address issues raised by commenters. New items cannot be raised during the reply comment period. Please clearly identify the comment number(s) and the name of the commenter that your reply comments are intended to address.

Comments may be filed using: (1) email, or (2) by filing paper copies.

- *Electronic Filers:* Comments may be filed electronically using email to the following email address: oset@ct.gov Electronic filers must include their full name, U.S. Postal Service mailing address, and the applicable docket number. A sample comment form is included as Annex “B” at the end of this document.
- *Paper Filers:* Parties who choose to file by paper must file an original and four copies of each filing. Filings can be sent by hand or messenger delivery, by commercial overnight courier, or by first-class or overnight U.S. Postal Service mail. All filings must be addressed to DSET Docket 13-01, Department of Emergency Services and Public Protection, 1111 Country Club Road, Middletown, CT 06457. Please be sure to include all of the information requested in Annex “B” at the end of this document.
- Documents in DSET Docket No. 13-01, including this entire NPRC document, comments and reply comments, will be available for public inspection on the agency web site, <http://www.ct.gov/despp>. Select “Statewide Emergency Telecommunications.”

VII. FURTHER INFORMATION

For further information concerning this NPRC proceeding, contact Stephen Verbil, Division of Statewide Emergency Telecommunications, at 860-685-8127, CT DESPP, 1111 Country Club Rd., Middletown, CT 06457 or stephen.verbil@ct.gov.

VIII. ANNEX A – ENHANCED 9-1-1 COMMISSION SUBCOMMITTEE REPORT

October 1, 2012

I. PSAP Consolidation:

Excerpts from the findings of the L.R. Kimball consolidation feasibility study:

"The majority of PSAPs handle less than 8,000 9-1-1 calls per year and many average between one and four 9-1-1 calls an hour. These PSAPs would greatly benefit operationally from consolidation and the State and the municipalities would benefit financially."

"At least half of the PSAPs have a 9-1-1 call volume low enough (an average of less than one call per hour) to suggest equipping the PSAPs with 9-1-1 equipment, CAD, radio consoles, logging recorders, and personnel is not cost effective."

"Consolidation of a large portion of Connecticut PSAPs is operationally, technologically, and politically feasible. In discussions with agency staff and decision makers, L.R. Kimball consistently heard that consolidation should only be considered if service levels provided by a consolidated PSAP are equal to or better than what is currently provided."

"In analyzing 9-1-1 call volume provided by OSET, L.R. Kimball established a threshold to separate PSAPs within the state. For the purposes of this analysis, L.R. Kimball used a threshold of 8,000 9-1-1 calls per year (see Table 9). Many PSAPs throughout the country and some within Connecticut may consider 8,000 9-1-1 calls per year extremely low and, based on knowledge and experience, L.R. Kimball cannot refute that assertion. Yet 50 of Connecticut's 106 PSAPs receive less than 8,000 9-1-1 calls per year. Using the 8,000 call threshold serves as a near mid-point to divide the PSAPs and translates into approximately 24 9-1-1 calls per day. Further, many of the PSAPs that handle less than 8,000 emergency 9-1-1 calls per year typically only have one telecommunicator assigned per shift, despite the fact that they may have two full-service console positions. It is understood that many of the 50 PSAPs that handle less than 8,000 9-1-1 calls per year also receive calls for service (both emergency and non emergency) via traditional 10-digit lines. However, for the most part, 9-1-1 call volume captured by the State is a very good indicator of how busy a particular PSAP is and whether the cost of that operation is justified."

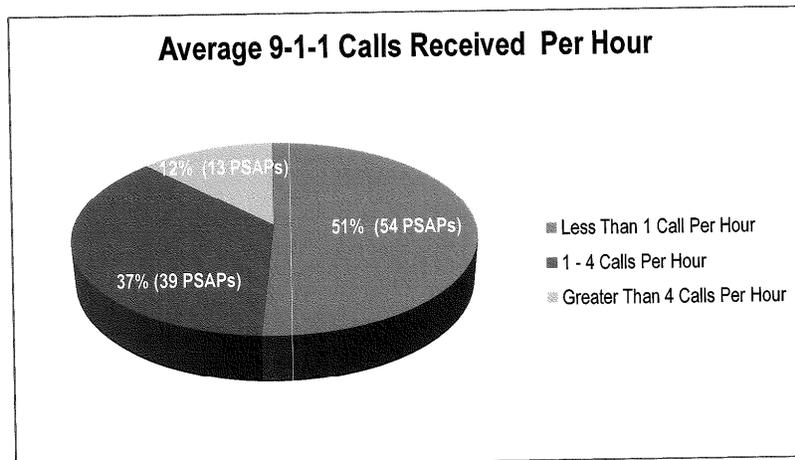


Figure 1 – Average 9-1-1 Calls Received Per Hour

“This chart graphically illustrates that in 51 percent of the state’s PSAPs **less than one 9-1-1 call per hour**, on average, is received and processed by PSAP staff. In 37 percent of the PSAPs, the PSAPs receive between one and four 9-1-1 calls per hour or a maximum of one call every 15 minutes. (Again, this is an average that assumes equal distribution of calls around a twenty-four hour clock. In reality, the per-hour call volume will be lower during some hours and higher during others.) Only 12 percent of the state’s PSAPs handle an average call volume of greater than four 9-1-1 calls per hour.

Taking into account the low 9-1-1 call volume received by the majority of the PSAPs and the expected associated radio traffic two points become immediately clear:

1. When the emergency communications workload is as low as seen here, the effective processing of 9-1-1 calls and the associated dispatch activities become a very small portion of the daily duties performed by the PSAP staff. This environment reduces the focus on effective delivery of emergency communications.
2. The cost of critical 9-1-1 systems such as 9-1-1 call answering positions and other systems and personnel paid for at the local level (radio consoles, CAD and logging recorders) is disproportionately high when compared to the actual workload associated with emergency communications (including 9-1-1 and the associated dispatch functions).”

“Regionalization would improve service levels statewide. Although much of this section discusses call volume and cost efficiencies, the most important reason to regionalize emergency communications in Connecticut is for the safety of the emergency responders and the communities that they serve. Many of Connecticut’s small PSAPs are staffed with one person taking calls and dispatching emergency responders. This staffing level is adequate most of the time. In fact many of these certified telecommunicators spend up to 80 percent of their time doing administrative work for their department. If any of these communities are faced with a major incident or multiple minor emergencies, the one telecommunicator will be quickly over-whelmed. A delayed response is inevitable as the person attempts to prioritize

and manage too many incoming calls and manage the needs of field personnel. A well run, adequately staffed regional center is better able to prioritize, coordinate and handle major disasters.”

“Connecticut has experienced bottom-up consolidation within the state as regional emergency communications centers were created at a grass roots level decades ago. More recently, the City of Torrington merged with Litchfield County Dispatch to become its 22nd member community. This clearly demonstrates that consolidation of services is a desirable option for many towns to pursue and can be achieved through consensus and proper governance. After surveying the PSAPs throughout Connecticut and conducting follow-up interviews, L.R. Kimball strongly advocates that Connecticut continue down this path and has developed recommendations to better facilitate continued regionalization.”

Findings of the PSAP Consolidation E911 Sub-Committee:

The sub-committee supports and agrees with Kimball's findings that there are too many PSAPs in Connecticut for a state of this size, many of which process too few calls to make them efficient or cost-effective. Small PSAPs may have a negative impact on both the public and public safety responders in an emergency situation due to insufficient staff and call handling proficiency. The committee's agreed upon direction is a “bottom up” approach which coincides with the consultant's recommendation. PSAPs which average less than 5,000 911 calls per year, in each of the DEMHS regions, would be identified and would be aligned with contiguous PSAPs that have similar systems (radio, CAD, etc). A manageable call volume threshold for OSET to analyze is 5,000 or less. If an appropriate number of municipalities cannot be identified within that group, then the number would increase incrementally by 1,000 until suitable matches are found (e.g., PSAPS with <6,000, calls, <7,000 calls, etc). OSET would contact the selected towns to discuss the concept and the benefits of consolidation. Funding opportunities including annual subsidies, capital expense and transition grants would be explained. Once a few PSAPs prove the concept to be possible and effective, it is expected that others would follow with consolidation initiatives of their own.

II. Funding:

Excerpts from the findings of the L.R. Kimball consolidation feasibility study:

“The formula in support of regional PSAPs has an inherent bias built in: even if the population served is roughly equal, regional PSAPs with more towns are funded at a significantly higher level than regional PSAPs with fewer towns.”

“L.R. Kimball's analysis revealed that the fund distribution formula subsidizes some PSAPs exponentially more than others solely because of the number of municipalities served. In the interest of reducing the inequity, L.R. Kimball recommends grouping statistically similar PSAPs into a bracket or pool. L.R. Kimball recommends phasing in this change over several annual budget cycles so the affected PSAPs have time to budget for any reduction in state funding.”

“The concern L.R. Kimball heard is whether the dramatic difference in funding is appropriate or fair for PSAPs that are otherwise equivalent in call volume and population served. There is a case to be made that a regional PSAP serving more towns has greater responsibility and increased operational complexity, although the impact is not as great as one might think. While the number of municipalities increases the number of dispatch-able resources, it is not the number of towns and dispatch-able resources that determine how busy a PSAP is; call volume and the

number of resulting dispatches are what determine how busy a PSAP is. Still, it is good policy to provide regional PSAPs with additional funding. It is the dramatically disproportionate level of funding that becomes the focus.”

“L.R. Kimball completely agrees with the concept of providing monetary incentives for regional operations, provided those incentives are calculated and distributed equitably.”

“The monetary value placed on the number of towns served seems disproportional to the workload, particularly when compared with a funded municipality that serves a population similar to what a regional PSAP serves.

“For the purpose of the funding formula, L.R. Kimball recommends that boroughs and municipal subdivisions not be counted as though they were municipalities. Their inclusion in the formula exacerbates the current funding disparity.”

Findings of the PSAP Consolidation E911 Sub-Committee:

The sub-committee supports Kimball's conclusion that the current funding model results in significant disparities among subsidized PSAPs, both between regional centers themselves and between regional centers and funded municipalities. The calculation should be corrected to provide a more equitable distribution of funds using a number of factors including the number of towns served, call volume and population served. Though several different funding models were proposed and discussed, it is not the intent of this committee to present a revised formula with this report. Formula changes that result in net increases to the OSET budget would have to be assessed and analyzed to ensure funding is available, and stakeholder input is received. The sub-committee also agrees with the Kimball conclusion that boroughs should be eliminated from the funding formula. This change will have to be assessed to determine if feasible from statutory/regulatory perspective.

IX. ANNEX B – SAMPLE COMMENT FORM

Information for filing in NPRC Docket 13-01, “Proposed changes to DESPP regulations regarding the subsidization of regional public safety emergency telecommunications centers, multi-town PSAPs and eligible municipalities.”

Release date: May 28, 2013

Comments due: June 24, 2013

Reply Comments due: July 29, 2013

Information to be included in all filings in this docket:

Docket Number: 13-01

Name of Filer:

Representing: (name of business or government agency)

Email Address:

Address Line 1:

Address Line 2:

City:

State:

Zip:

Type of Filing: (COMMENT or REPLY COMMENT)

If filing during the Reply Comment period, you must identify the comment number and name of the filer that you are responding to:

Comments: