

February 25, 2015



**Quinebaug Valley
Emergency
Communications, Inc.**

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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:

This is a personal expression of concern with the Subsidy Revision Proposal made by DSET. I provide these comments on QVEC letterhead so as to avoid any suggestions that I may be trying to obscure my affiliation.

As DSET is well aware, Connecticut operates perhaps more PSAPs per 1000 population than any other state. Despite DSET's assertions that it is interested in reducing the number of 9-1-1 centers through consolidation, it has made virtually no effort to do so and the state has had little success in reducing the number of PSAPs for nearly two decades. The continued existence of an excessive number of small, inefficient PSAPs is the largest problem facing emergency notification in our state. DSET's failure to provide leadership to effectively address the problem puts Connecticut, increasingly, out of touch with the direction that the FCC has charted for the refinement of the national 9-1-1 system.

The General Assembly made it clear in 1996 and 2005 that subsidy of regional PSAPs based on the population, number of services dispatched and number of municipalities served is the most effective tool that the state can utilize to encourage consolidation. The legislature, in P.A. 10-125, also provided a view of one approach that could have reduced the number of PSAPs further. In doing so it validated that it recognizes the problem and is willing to support drastic action to ameliorate the situation. The MORE Commission, vitally interested in regionalization of government services to reduce costs and improve efficiency, has as one of its key objectives strengthening regional PSAPs. Why is DSET's proposal inconsistent with that of a key arm of the Legislature?

The main conclusion of the lengthy and expensive, if not overly insightful, Kimball report commissioned by DSET/OSET was that extensive consolidation of the excessive number of PSAPs (to one, three or five) could both yield significant cost savings to municipalities as well as the state and also remedy the excessive PSAP problem. The specious sidebar discussion in which the obvious conclusion that the consolidation incentive does not yield equivalent subsidy per person for all subsidized entities is a diversion from the main problem that encourages financially threatened entities to grab for the funds rather than working together to implement a solution to the main problem. Why DSET does not work to support the main conclusion rather than pursuing a side issue is a mystery indicative of its preoccupation. DSET, in its role as a champion of the 9-1-1 system, ought to encourage radical consolidation, not serve to pit the largest consolidated entities against smaller, less efficient regional systems. Unfortunately it seems that DSET in its redefinition of itself as a message carrier, without legislative mandate or approval, has underestimated the cost and effort required and appears to be consuming all of its resources to accomplish its newly adopted mission.

The subsidy proposal offered practically assures that none of the twenty-three subsidized municipalities will regionalize and makes clear that DSET no longer considers consolidation of PSAPs a high priority. The construction of a new formula to be applied to regional PSAPs only dispenses with what is today the legislative intent and public policy of the state, namely that the number of municipalities served ought to factor into subsidy determination. Its effect would be to remove \$660,000 of subsidy funds from the largest regional entities (serving 30% of Connecticut's municipalities) only to dispense \$550,000 of it to smaller, less efficient regionals. In essence DSET asks those municipalities that for nearly two decades did what the state wanted, to give up the savings they achieved so that other municipalities, that had the same opportunities to regionalize, may benefit. To make it worse the proposal takes from the poorest towns to give to some of the wealthiest. How does this serve equity or encourage a reduction in PSAPs? If DSET truly believes that the current formula "short-changes" small and inefficient RECCs, why not fix that problem without adversely affecting the largest regionalized entities? Connecticut's 9-1-1 surcharge is lower than those of surrounding states. If sufficiency of funds is a problem, there is a mechanism for seeking an increase, which would probably involve less effort than forcing 30% of the state's municipalities to dig deeper.

The proposal fails to consider the number of 9-1-1 calls per capita among existing RECCs and thus builds a significant bias into the suggested subsidy calculations. If the formula is accepted at all, population alone should be used as a factor.

There are significant and capital-intensive location accuracy and z-axis location identification efforts under study at the FCC, as well as the suggestion that major reductions in the number of PSAPs are under consideration. DSET should bend its efforts to reducing the number of small, inefficient and under-capitalized PSAPs, not reducing the funding of the largest and most successful regional PSAPs in the state. A good starting point would be to abandon the current Subsidy Revision Proposal, to support the longstanding intent of the legislature by not changing or perhaps improving the funding of RECCs through a modification of the current funding formula and to seek means of reducing small PSAPs through consolidation, perhaps in the manner suggested by P.A. 10-125.

Very truly yours,
Jeffrey B. Otto
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