



March 12, 2012  
Finance Revenue & Bonding Committee

**Raised Senate Bill 354 – An Act Concerning the Enhanced Emergency 9-1-1 Program**

7-Eleven has 51 franchised convenience stores located across Connecticut, which are operated by Connecticut residents and their families. Franchise store owners run their businesses and 7-Eleven supports efforts to enhance their economic success. 7-Eleven stores sell pre-paid services cards to our customers that we buy from prepaid wireless service provider companies in increments starting at \$10 per card (we do not sell the actual phone and the wireless service in the same package – they are sold separately). After the purchase, the customer must call the service provider to activate the card.

Current law under General Statutes section 16-256g requires providers of local telephone service; providers of commercial mobile radio service; providers of prepaid wireless services; and providers of voice over Internet protocol services to collect E 9-1-1 fees from their subscribers.

Also, current law under General Statutes section 28-30c requires each active prepaid wireless service provider to assess and collect the E 9-1-1 fee from their subscribers.

We respectfully contend that the current laws do not need to be changed to now require retail stores and the Department of Revenue Services to get into the process of collecting the E 9-1-1 fees, as is proposed in SB 354.

SB 354 establishes a complicated new system where Connecticut's hundreds of small retailers and convenience stores will be now required to collect an additional, new 50 cent "prepaid wireless E 9-1-1 fee" from our retail customers who buy prepaid wireless service cards. Each store would have to devote significant resources to change their software programs and sales transactions procedures to collect this new fee; and they would have to set up new systems to pay the fee to the CT Department of Revenue Services (DRS). At the same time, DRS is required to establish a new system to collect the fees from all of the stores (see lines 85 -91 of SB 354); and then DRS must establish a system to remit those payments over to the State Treasurer's "Enhanced E 9-1-1 Telecommunications Fund" (see lines 102-112).

We certainly understand that the State needs money in the E 9-1-1 fund; but we respectfully suggest that it may make more sense to continue the current practice under Sections 16-256g and 28-30c to require the prepaid wireless service providers collect the E 9-1-1 fees from their subscribers. It will be certainly less cumbersome for the retail stores, for DRS and for the State Treasurer – if the prepaid wireless E 9-1-1 fee was built into the original wholesale cost of the prepaid wireless service cards; and the prepaid wireless service providers who sell these cards to the retailers could continue to remit the built-in fee directly to the State Treasurer – rather than placing the burden on new players – the retail stores and the DRS – to get involved in the fee collection process.

**We thank you for your consideration of our position on SB 354.**

**Attorney Robert Shea**  
**Shea Law Inc.**  
[shea@shealawinc.com](mailto:shea@shealawinc.com)  
**860-989-5567**