



STATE OF CONNECTICUT
DEPARTMENT OF EMERGENCY SERVICES & PUBLIC PROTECTION
OFFICE OF THE COMMISSIONER

March 6, 2012

Rep. Stephen Dargan, Co-Chairman
Sen. Joan Hartley, Co-Chairman
Public Safety and Security Committee
Legislative Office Building
Hartford, CT 06106

**HB 5381 AN ACT CONCERNING THE IMPLEMENTATION OF THE PUBLIC SAFETY
ANSWERING POINT CONSOLIDATION FEASIBILITY STUDY**

***The Department of Emergency Services and Public Protection does not support this
bill as currently drafted.***

While the Department of Emergency Services and Public Protection supports the intent of this proposed bill, "to achieve financial and operational efficiencies in the handling of emergency 9-1-1 calls", the agency cannot support the bill as currently drafted. The current language of the bill directs the Office of State-Wide Emergency Telecommunications (OSET) to implement "the recommendations of the Connecticut PSAP Consolidation Feasibility Study, dated January, 2012, concerning (1) the consolidation of municipal, regional, multi-town and state public safety answering points, and (2) the funding of such consolidation."

OSET and The Department of Emergency Services and Public Protection strongly agree that there are too many PSAPs serving a state the size of Connecticut. Fewer PSAPs would service Connecticut more effectively and efficiently, however, "implementing" the study as is does not serve the purpose. The study should be used as key input to a comprehensive PSAP reduction strategy that meets the needs of the state, the municipalities and the citizens of Connecticut.

The "Connecticut PSAP Consolidation Feasibility Study, dated January, 2012" was performed by an independent public safety consulting firm, LR Kimball, who interviewed and surveyed each of the Public Safety Answering Points (PSAPs) in the state to obtain its data. Kimball was charged with assessing the 911 call volumes, geography, and interest in consolidation, among other factors, and to develop a recommended number of PSAPs for the state to achieve improved and more cost effective delivery of services. They were also asked to review the current funding model and make any recommendations for improvement.

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Several points need to be raised as to why the Kimball report cannot be legislated:

As a preliminary matter, it should be noted that the study is not OSET's; it is entirely the work and view of a third party. It provides much comprehensive data, but its recommendations should be assessed, weighed and tested against other opinions among both the state and municipal interests. It is not possible to "implement the report" as the report outlined and recommended *several* models that the state might use to achieve greater efficiency including

- an "optimal" three regional PSAPs statewide as well as
- a five regional PSAP design which aligns with the DEMHS regions

It was recognized by the Kimball report itself that these were both unlikely and capital intense scenarios. Given those realities, Kimball in fact suggests that the state continue down the path of "bottom-up" consolidation where towns regionalize together "through consensus and proper governance" versus legislative mandate, beginning with those towns that have already taken proactive steps.

Furthermore, prior to the General Assembly requiring OSET to implement any significant reorganization of PSAPs it would be necessary to give OSET the necessary statutory authority to do so. The existing statutory framework is entirely a 'carrot' based approach through which OSET is directed to give increased funding to PSAPs that consolidate and regionalize. There is no corresponding 'stick' approach in the statutes that would penalize or withdraw funding from small stand alone PSAPs that have small caller volume. While the Kimball report makes recommendations to increase OSET's authority to adjust the levels of funding it provides for various programs, this would require action and statutory direction from the General Assembly.

The Kimball report also makes funding recommendations, including increasing supplemental grants to further incentives to consolidation, which cannot be supported financially at this time. (In fact OSET is not currently able to meet its statutory obligations without a change in the statutory cap on the 911 surcharge, the subject of which is addressed in HB 5378 AN ACT CONCERNING THE MAXIMUM SURCHARGE FOR ENHANCED 9-1-1 SERVICE, the passage of which is urgently needed)

Sincerely,

Reuben F. Bradford
COMMISSIONER