The Commonwealth of Massachusetts
EXECUTIVE OFFICE OF PUBLIC SAFETY AND SECURITY
STATE 911 DEPARTMENT
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CHARLES D. BAKER
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Lieutenant Governor

DANIEL BENNETT
Secretary of Public Safety and Security

FRANK POZNIAK
Executive Director

May 7, 2015

VIA ELECTRONIC MAIL AND OVERNIGHT MAIL

Ms. Sara Clark,
Secretary and Paralegal Specialist
Massachusetts Department of Telecommunications and Cable
1000 Washington Street, Suite 820
Boston, Massachusetts 02118-6500

RE: D.T.C. 15-2, Petition of the State 911 Department to Adjust the Enhanced 911 Surcharge

Dear Ms. Clark:

In connection with the above matter, enclosed herewith for filing are Responses to the Record Requests of the Department of Telecommunications and Cable and the CTIA to the State 911 Department.

Thank you for your attention to this matter.

Sincerely,

Louise M. McCarthy
General Counsel

Enclosures

cc: Service List

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND CABLE

Petition of the State 911 Department to Adjust the Enhanced 911 Surcharge	)	D.T.C. 15-2

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon each person designated on the official service list compiled by the Secretary in this proceeding, dated this May 7, 2015.

Louise M. McCarthy
General Counsel
State 911 Department
1380 Bay Street, Building C
Taunton, Massachusetts 02780
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COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND CABLE
RECORD REQUESTS OF THE DEPARTMENT OF TELECOMMUNICATIONS AND CABLE TO THE STATE 911 DEPARTMENT
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Responsible Person: Frank Pozniak

D.T.C. 1-1

The Enhanced 911 Surcharge Monthly Report ("Monthly Surcharge Report") provided as part of Information Request D.T.C. 1-10 has a space for "Type of Service Provider":

a. State whether any carriers do not report their type of service provision in this space. If certain carriers do not report their type of service provision, describe how the 911 Department handles such responses in terms of compiling subscriber counts by service carrier type.

b. State whether any carriers report multiple categories of service provision in this space on a single Monthly Surcharge Report. If certain carriers do report multiple categories of service provision on a single Monthly Surcharge Report, describe how the 911 Department handles such responses in terms of compiling subscriber counts by service carrier type.

Response:

a. Some carriers have failed to report their type of service. In such cases, if a carrier initially fails to report the type of service provision, the State 911 Department reviews the prior months' filings for the carrier to confirm the service type. If the reporting carrier is a new filer or if additional information is necessary, the State 911 Department contacts the carrier to confirm the proper service type. This information is required for the State 911 Department to compile subscriber counts.

b. Some carriers report multiple categories of service on a single monthly surcharge report. If the carrier reports multiple categories of service on a single Monthly Surcharge Report, the State 911 Department contacts the carrier and requests a breakdown.

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D.T.C. 1-2 For Calendar Year 2013, FY2014, and FY2014, please provide the number of carriers that reported each type of service provision listed on the Monthly Surcharge Report (i.e., wireline, wireless, pre-paid wireless, and VoIP). Additionally, please provide an aggregate count of unique reporting carriers across all types of service provision (i.e., do not count a carrier twice if it reported service provision in more than one category).

Response: See below. The data is compiled and maintained on a Fiscal Year basis, and, therefore, the calendar year data is included in the Fiscal Year data below.

	FY2013	FY2013 Unique	FY2014	FY2014 Unique
Wireline	67	59	67	58
Wireless	30	20	34	24
VoIP	38	24	50	42
Pre-Paid	15	9	17	10

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D.T.C. 1-3

220 C.M.R. § 16.00 outlines equivalency ratios for use in determining the number of end user accounts for 911 surcharge remittance.

a. Please provide the number of reported wireline subscribers for FY2014, broken down by the number of connections directly counted and the number of connections calculated using equivalency ratios.

b. Please state whether any VoIP carriers use the equivalency ratios prescribed for wireline service in VoIP carriers' reporting on the Monthly Surcharge Report.

c. If VoIP carriers use the equivalency ratios prescribed for wireline service, please provide the number of reported VoIP subscribers for FY2014, broken down by the number of connections directly counted and the number of connections calculated using equivalency ratios.

Response:

a. The number of wireline subscribers for FY2014 broken down by the number of connections directly counted and the number of connections calculated using equivalency ratios is not available to the State 911 Department.

b. Although VoIP carriers are not required to identify the use of equivalency ratios on the Monthly Surcharge Report, it is the State 911 Department's information and belief that some VoIP carriers use the equivalency ratios.

c. See b. above.

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D.T.C. 1-4 Please provide a copy of one of the letters the 911 Department sent to wireless carriers in 2008 regarding the 911 surcharge remittance

Response: Attached is a copy of the letter notice that the State 911 Department sent to all types of carriers, including wireless carriers, in 2008 regarding the 911 surcharge remittance.

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D.T.C. 1-5 State whether wireless end users with out-of-state area codes are assessed the Massachusetts 911 surcharge if the billing address for an account is in Massachusetts. Additionally, state whether methodologies for determining the number of end users assessed the Massachusetts 911 surcharge vary among wireless carriers, whether such variances related to area codes or otherwise.

Response: The methodologies for determining the number of end users by the carriers is unknown and may vary among the wireless carriers. The State 911 Department's enabling statute permits the wireless carriers to impose the surcharge on the area code, the billing address, or other manner consistent with federal law.

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D.T.C. 1-6

Regarding remittance of the 911 surcharge by pre-paid wireless carriers via the Average Revenue Per User ("ARPU") formula prescribed in 560 C.M.R. § 3.00:

a. Please state whether pre-paid wireless carriers provide the inputs of the ARPU formula on the Monthly Surcharge Report or elsewhere.

b. Please state whether carriers update the inputs of the ARPU formula on a regular basis. If carriers do update the inputs of the ARPU formula on a regular basis, state how frequently.

Response:

The State 911 Department's Regulations Establishing an Equitable and Reasonable Method for the Remittance and Collection of a Surcharge on Prepaid Wireless Telephone Service (560 CMR 3.00) permit the prepaid wireless telephone carrier to elect the method of collection (either 1) collection from the subscriber, end user, or customer or 2) calculation utilizing the carrier's national average revenue per user, or "ARPU"). These regulations were established pursuant to the State 911 Department's enabling statute (Chapter 223 of the Acts of 2008 or "enabling statute") following a public hearing process. These regulations do not require the carrier to provide the inputs of the ARPU formula, nor do they require the carrier to disclose how frequently the carrier updates the inputs of the ARPU formula. The adoption of a prepaid point of sale method for collection of the surcharge (which would likely call for enforcement by the Department of Revenue, not the D.T.C.) would require a legislative change.

a. Prepaid carriers do not provide the inputs of the ARPU formula on the Monthly Surcharge Report or elsewhere.

b. It is not known how frequently the carriers update the inputs of the ARPU formula.

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D.T.C. 1-7 State whether any carriers indicate "IP-enabled service" in response to "Type of Service Provider" on the Monthly Surcharge reports.

Response: No carriers indicate "IP-enabled service" in response to "Type of Service Provider" on the Monthly Surcharge reports.

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D.T.C. 1-8 Please review the Local Telephone Competition report issued by the Federal Communications Commission ("FCC") in October 2014 for data through December 31, 2013 (Exhibit 4), and the FCC's filing instructions for Form 477 for the same period (Exhibit 5). Please compare and contrast the reporting requirements for the Form 477 with the 911 surcharge remittance requirements and explain why there may be differences between the total number of wireless subscribers reported by the FCC and the total number of wireless subscribers reported by the wireless carriers as reflected on the Monthly Surcharge Reports for the same period.

Response: The State 911 Department has reviewed Exhibit 4 and Exhibit 5. The reporting requirements for FCC Form 477 differ from the reporting requirements relative to the Massachusetts Enhanced 911 Surcharge. This explains why there may be differences between the total number of wireless subscribers reported by the FCC and the total number of wireless subscribers reported by the wireless carriers as reflected on the Monthly Surcharge Reports for the same period.

The State 911 Department's enabling statute provides that "[t]here shall be imposed on each subscriber or end user whose communication services are capable of accessing and using an enhanced 911 system, a surcharge . . ." The enabling statute defines "end user" as a person who uses communication services and likewise defines a "subscriber" as a person who uses communication services. The enabling statute defines "communication services" as follows: " . . . any of the following: (a) the transmission, conveyance or routing of real-time, two-way voice communications to a point or between or among points by or through any electronic, radio, satellite, cable, optical, microwave, wireline, wireless or other medium or method, regardless of the protocol used; (b) the ability to provide two-way voice

communication on the public switched network; (c) wireless enhanced 911 service; (d) wireline enhanced 911 service; (e) interconnected VoIP provider service as defined by the regulations of the FCC regulations; (f) IP-enabled service; or (g) prepaid wireless service. The enabling statute defines "wireless enhanced 911 service" as "the service required to be provided by wireless carriers under, and governed by, FCC order."

FCC Form 477 reporting applies to "units in service that combine voice telephone with other services." FCC Form 477 requires that each "facilities-based provider of mobile telephony service" must complete Form 477. FCC Form 477 defines "mobile telephone (Mobile Voice) Subscriber as "[A] mobile handset, car-phone, or other revenue-generating, active, voice unit that has a unique phone number and that can place calls to and receive calls from the public switched telephone network." The State 911 Department's enabling statutes does not define or refer to facilities-based providers of mobile telephony service. The FCC's definition of "subscriber" does not refer to enhanced 911 service and could include data only devices (with no wireless voice service that can access the enhanced 911 system), burglar and fire alarm units (with data capabilities, but no ability to access the enhanced 911 system), personal internet hotspots (with no ability to dial 911), and devices (such as tablets, iPads, Kindles, etc.) as well as certain telematic services.

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D.T.C. 1-9 Please confirm that the following data are correct: (i) FY2014 Revenue (listed as $74,685,294 on Exhibit A to the Petition) and (ii) FY2015 Incentive Grant (RECC) projected expenditures (listed as $3,545,971 on Exhibit B to the Petition). If the data are correct, please state whether the State 911 Commission adjusted the percentage of total surcharge revenue to be allocated to the Incentive Grant (RECC) in FY2015, as well as the 911 Department's position on whether it must seek Department approval for any such FY2015 adjustment.

Response: The State 911 Department hereby confirms that the following data are correct: (i) FY2014 Revenue (listed as $74,685,294 on Exhibit A to the Petition) and (ii) FY2015 Incentive Grant (RECC) projected expenditures (listed as $3,545,971 on Exhibit B to the Petition). The State 911 Commission, through the approval of the Development Grant Guidelines, adjusted the percentage of total surcharge revenue to be allocated to the Incentive Grant (RECC) category in FY 2015.

The State 911 Department's Petition seeks approval for the projected expenditures listed on Exhibit B to the Petition for FY2015. These include the FY2015 Incentive Grant RECC Category expenditures. Therefore, the State 911 Department respectfully requests D.T.C. approval of this line item (4.7% of FY2014 year revenues). The State 911 Department further requests that this issue be treated as part of the Petition (as stated by the Hearing Officer at the public hearing held on May 1, 2015). This adjustment allows the State 911 Department to meet its statutory obligations to maximize effective enhanced 911 services and regional interoperability and furthers the State 911 Department's goals of increased regionalization which will, in turn, lead to a more efficient and effective use of resources and improve public safety.

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The Petition (footnote 2) also requests that the D.T.C. treat the Petition as satisfying the requirement to report annually to the D.T.C. on the financial condition of the Enhanced 911 Fund and on the assessment of new developments affecting the enhanced 911 system for FY2013, FY2014, and FY2015. With respect to the annual filing for FY 2013 and FY2014, it should be noted that, during the 2013 and 2014 timeframe, the State 911 Department gave consideration to filing a petition to adjust the Enhanced 911 Surcharge. During that timeframe, the State 911 Department engaged in informal discussions with the prior D.T.C. Commissioner regarding timing and procedure, and it was suggested that, in order to further administrative efficiency, the State 911 Department include the annual report information at the time its filed a petition to adjust the Enhanced 911 Surcharge. In fact, the State 911 Department previously filed a Petition to Adjust the Enhanced 911 Surcharge with the D.T.C. on September 11, 2014 (subsequently withdrawn) that included a request to treat that filing as satisfying the annual report for FY2013 and FY2014. The State 911 Department has provided full and complete information regarding its finances, budgets, and expenditures at all times since its inception, and remains transparent and accountable in all respects.

The State 911 Department has, through the substantial evidence that has been produced, established that its projected expenses are prudently incurred. Further, the State 911 Department has demonstrated that the requested adjustment to the Enhanced 911 Surcharge is consistent with the D.T.C.'s established goals of ensuring a stable surcharge. In accordance with the D.T.C.'s stated goal of assessing the long-term health of the Enhanced 911 Fund in order to ensure that ratepayers are not unreasonably impacted, the State 911 Department has provided five-year forecasts based on data and assumptions to a high level of confidence based on long-term planning. This information demonstrates that the overall rate of expenditures exceeds the Enhanced 911 Fund revenues and surplus at the current seventy-five (75) cent Enhanced 911 Surcharge level. It should be noted that a large portion of the State 911 Department's expenses are committed expenses over which the State 911 Department has little

control. At a minimum, ninety (90) percent of the State 911 Department's budget goes to support local public safety answering points ("PSAPs") and the disability access programs. With so much of the budget committed to spending on these programs, the State 911 Department has little flexibility with which to make adjustments. As the Enhanced 911 Fund surplus is depleted, there is little capital left for the State 911 Department to use to fund unanticipated new projects, upgrades or enhancements to existing projects, or other necessary or unforeseen expenses. The State 911 Department's Next Generation 911 project, for example, is of unprecedented scope, size, and complexity. Given that the State 911 Department's primary mission is to ensure that 911 service is available to the citizens of the Commonwealth with no interruption, it is necessary to ensure that the system is properly funded and that the balance of the Enhanced 911 Fund is adequate through the transition to the new system and beyond. It is necessary to maintain a surplus balance in the Enhanced 911 Fund, and it is simply not permissible for the Enhanced 911 Fund to operate at a deficit. Therefore, to maintain the surcharge at seventy-five cents (or to reduce the surcharge to seventy-five cents at the conclusion of the deployment of the Next Generation 911 system) would be contrary to the long-term health of the Enhanced 911 Fund and the goals of long-term stability of the Enhanced 911 Surcharge. The Exhibits to the Petition clearly demonstrate that the State 911 Department would operate at a deficit (expenses exceeding revenues) at the current surcharge level of seventy-five cents.

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D.T.C. 1-10 Referring to Exhibit B of the Petition, please provide a breakdown of IT Services, Equipment (UU) projected expenditures for FY2015, specifically breaking out expenses towards equipment, staff augmentation, temporary staff, and contractors. Additionally, please provide complete and detailed documentation of the size and scope of the three largest projects—in terms of dollars spent or projected to be spent—the 911 Department is undertaking or is projected to undertake in FY2015 under this line item.

Response: The breakdown of IT Services and Equipment is as follows:

MMARS Object Code	Description	Amount Budgeted	Total Amount Budgeted
U01	Telecommunication Services Data	$ 100	
U02	Telecommunication Services Voice	$ 33,000	
U04	Information Technology Chargeback	$ 40,000	
U05	Information Technology Temporary Staff Augmentation Professionals	$ 892,111	
U09	Information Technology equipment Rental/ Lease	$ 1,289	
U10	Information Technology Equipment Maintenance & Repair	$ 3,500	
U98	Reimbursement for travel and expenses for Information Technology Professionals	$ 30,000	$ 1,000,000

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The three largest projects that the State 911 Department is undertaking or is projected to undertake in FY2015 under this line item are the Next Generation 911 Project, the Wireless Direct Project, and the Digital Logging Recorder ("DLR") Project. A description of each of these projects is set forth in the Petition.

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D.T.C. 1-11 Please provide the total actual expenditures under the 911 Department's Development Grant since the Development Grant's inception.

Response: The total actual expenditures under the State 911 Department's Development Grant since the inception of the Development Grant are: $35,355,566.12.

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D.T.C. 1-12: Please provide all Monthly Surcharge Reports filed by carriers identifying their service provider type as "Wireless" and "Pre-Paid Wireless" for FY2014.

Response: The records requested consist of subscriber and end user information and/or data submitted to the State 911 Department by communication service providers. This information is not subject to public disclosure pursuant to G.L. c. 6A, § 18H, and is, therefore, exempt under G.L. c. 4, § 7 Twenty-sixth (a), for the reasons set forth in the State 911 Department's Motion for Confidential Treatment filed this date. These confidential records are being furnished under separate cover with the understanding that, consistent with D.T.C. practice, they will be afforded confidential treatment until such time as the D.T.C. rules on the State 911 Department's Motion for Confidential Treatment.

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D.T.C. 1-13: With respect to the 911 Department's Training Grant, please provide the following information for FY2011, FY2012, FY2013, and FY2014:

a. The actual number of person-weeks of training provided;

b. The number of training courses, the typical duration of the courses, and the typical class size;

c. The location(s) of the training courses;

d. The conductor(s) of the trainings courses (e.g., internal staff, outside agencies, independent contractors, etc.);

e. The cost of conducting each training course; and

f. Whether the Training Grant funds anything other than these training courses.

Response:

The State 911 Department Training Grant is a statutory-required grant that, in accordance with the enabling statute, must be funded by the State 911 Department at a minimum of 3.75 percent of the previous Fiscal Year revenues. Training Grant funds are allocated to each PSAP in the Commonwealth based on call volume and population. The State 911 Department Training Grant and the EMD/Regulatory Compliance Grant fund the minimum telecommunicator certification requirements described in the Petition and below, and to the extent there are funds available in the PSAP's allocation after meeting the minimum requirements, such funds can be used for other training purposes. The State 911 Department Training Grant has been close to fully subscribed each Fiscal Year, meaning that contracts have been executed with most PSAPs for their full allocation amount.

a. The State 911 Department does not track by person weeks the training provided under the State 911 Department Training Grant.

However, beginning in FY2013, in order for a person to act as an enhanced 911 telecommunicator in the Commonwealth, it is necessary to successfully complete minimum requirements relative to equipment and basic telecommunicator training, and to successfully complete thereafter continuing education training, as more fully described in the Petition. As noted in the Petition, the State 911 Department's Regulations Establishing Certification Requirements for Enhanced 911 Telecommunicators, Governing Emergency Medical Dispatch, and Establishing 911 Call Handling Procesdures (560 CMR 5:00, or "EMD Regulations") require that all certified enhanced 911 telecommunicators complete sixteen (16) hours of continuing education annually. Further, the EMD Regulations require new hires to complete a minimum of two (2) days of 911 equipment and basic training and to complete a minimum of forty (40) hours of Department-approved basic telecommunicator training, plus certification in emergency medical dispatch ("EMD") (at either twenty-four (24) hours or thirty-two (32) hours depending on the vendor) if providing EMD in-house.
b. The training is managed by the PSAPs, and the courses vary. The State 911 Department has compiled and publishes in the Grant Guidelines the listing of courses previously requested by PSAPs and authorized by the State 911 Department. The approved course listings from the State 911 Department Training Grant Guidelines for FY 2011, FY2012, FY2013, and FY2014 are attached hereto. The complete State 911 Department Training Grant Guidelines for FY2011, FY2012, FY2013, and FY2014 are available on the State 911 Department's website at www.mass.gov/e911. All courses found on this list are considered to be approved, and no further advance written authorization from the State 911 Department is required. This list is not intended to limit training opportunities but is merely provided as a resource to Grantees. Grantees are permitted to submit additional courses for consideration of approval. The duration of the individual courses vary, and typically are either four (4), eight (8), or sixteen (16) hour courses. The typical class size varies, but typically the class size does not exceed thirty (30) students.
c. The training courses take place statewide throughout the Commonwealth at the State 911 Department training facilities in Maynard, Springfield, or Taunton, or at locations where training is

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hosted by the PSAPs, and, with advance approval, outside of Massachusetts.

d. The courses, certifications, and training may be hosted by or offered by the State 911 Department, or courses, certifications, and training hosted by other entities.

e. All courses, certifications, and training hosted or offered by the State 911 Department are free of charge, and no vendor fees are charged to participants. Training courses hosted by entities other than the State 911 Department within Massachusetts include in-house training courses hosted by PSAPs. There are typically costs for these courses, particularly if outside vendors are utilized to conduct the training. Grantees are also permitted to obtain approval for additional courses, and for training held outside of Massachusetts, all in accordance with and subject to the terms and conditions of the Grant Guidelines.

f. The State 911 Department Training Grant funds the following categories of expenses: fees; personnel costs; training software and other products; and lodging. See the Training Grant Guidelines at on the State 911 Department's website at www.mass.gov/e911.

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CTIA Request 1: Please provide the tables (average subscriber counts) in the Petition back to 2008.

Response: The average subscriber counts have been compiled in this manner commencing with the FY2011 time period. The average subscriber counts for FY2011, FY2012, FY2013, and FY2014 are set forth below.

Carrier Type	FY2011 Average Subscriber Count	FY2012 Average Subscriber Count	FY2013 Average Subscriber Count	FY2014 Average Subscriber Count (as of February 2014)
Wireline	2,807,478	1,920,774	1,839,317	1,675,458
Wireless	5,033,668	5,074,576	5,039,395	4,997,158
VoIP	159,546	973,614	1,069,182	1,200,266
Pre-paid	248,063	313,933	382,869	416,950