

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND CABLE**

_____)
Petition of the State 911 Department)
For Approval of Fiscal Year 2018 Expenditures and)
Adjustment of the Enhanced 911 Surcharge)
_____)

D.T.C. 18-2



**OFFICE OF THE ATTORNEY GENERAL'S
FIRST SET OF INFORMATION REQUESTS
TO THE STATE 911 DEPARTMENT**

INSTRUCTIONS

1. These Information Requests call for all information, including information contained in documents, which relates to the subject matter of the requests and which is known or available to the State 911 Department (“Petitioner”) or to any individual or entity sponsoring testimony or retained by the Petitioner to provide information, advice, testimony or other services in connection with this proceeding.
2. Where an Information Request (“IR”) has a number of separate subdivisions or related parts or portions, a complete response is required to each such subdivision, part, or portion. Any objection to an IR should clearly indicate the subdivision, part, or portion of the IR to which it is directed.
3. If the information requested is not available in the exact form requested, provide such information or documents as are available that best respond to the IR.
4. These IRs are continuing in nature and require supplemental responses when further or different information with respect to the same is obtained.
5. Each response should be furnished on a separate page, headed by the individual IR being answered, and beginning with a restatement of the IR. Individual responses of more than one page should be stapled or bound and each page consecutively numbered.
6. Each IR to “Please provide all documents...” or similar phrases includes a request to “identify” all such documents. “Identify” means to state the nature of the document, the date on which it was prepared, the subject matter and the titles and the names and positions of each person who participated in the preparation of the document, the addressee and the custodian of the documents. To the extent that a document is self-identifying, it need not be separately identified.

7. For each document produced or identified in a response which is computer generated, state separately (a) what types of data, files, or tapes are included in the input and the source thereof, (b) the form of the data which constitutes machine input (e.g., punch cards, tapes), (c) a description of the recording system employed (including descriptions, flow charts, etc.), and (d) the identity of the person who was in charge of the collection of input materials, the processing of input materials, the data bases utilized, and the programming to obtain the output.
8. If an IR can be answered in whole or part by reference to the response to another IR served in this proceeding, then it is sufficient to respond by specifying the other IR by number, by specifying the parts of the other response that are responsive, and by specifying whether the response to the other IR is a full or partial response to the instant IR. If it constitutes a partial response, then the balance of the instant IR must be answered.
9. If the Petitioner cannot answer an IR in full, after exercising due diligence to secure the information necessary to do so, state the answer to the extent possible, state why the Petitioner cannot answer the IR in full, and state what information or knowledge is in the Petitioner's possession concerning the unanswered portions of the IR.
10. If, in answering any of these IRs, you feel that any IR or definition or instruction applicable thereto is ambiguous, set forth the language you feel is ambiguous and the interpretation you are using in responding to the IR.
11. If an IR calls for a document that is no longer in existence, identify the document, and describe in detail the reason(s) the document is unavailable.
12. Provide copies of all requested documents. A response that does not provide the AGO with the responsive documents, and requests the AGO to inspect the documents at any location is not responsive.
13. If you refuse to respond to any IR by reason of a claim or privilege, or for any other reason, state in writing the type of privilege claimed and the facts and circumstances you rely upon to support the claim of privilege or the reason for refusing to respond. With respect to IRs for documents to which you refuse to respond, identify each such document.
14. Each request for information includes a request for all documentation which supports the response provided.
15. Provide a copy of each response both electronically and on three-hole punched paper.
16. Unless the request specifically provides otherwise, the term Petitioner includes all witnesses, representatives, employees, and legal counsel.

17. Please submit responses within 10 calendar days of receiving the request.

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AGO-1-1

Please refer to your response to DTC-1-7, subpart (e), dated April 27, 2018, summarizing the current uses of the Commonwealth of Massachusetts Interoperable Radio System (CoMIRS).

(a) Please identify and fully describe the role any of the facilities and equipment in the CoMIRS system currently plays in the provision of "Enhanced 911 service," defined in G.L. c. 6A, § 18A as:

a service consisting of communications network, database and equipment features provided for subscribers or end users to reach a PSAP by dialing the digits 911... that directs calls to appropriate PSAPs based on selective routing and provides the capability for automatic number identification and automatic location identification.

(b) Please confirm whether and how an "end user" or "subscriber" of a "communications service provider," as those terms are defined in G.L. c. 6A, § 18A, that dials 9-1-1 will be routed or directed to the appropriate PSAP through the use of the facilities and equipment in CoMIRS?

(c) Explain whether and how the facilities or equipment of CoMIRS is used to provide the PSAP with either selective routing instructions or the automatic number identification or automatic location identification of a 911-dialed call from a communications service provider's subscriber or end user.

AGO-1-2

Please refer to your response to DTC-1-7, subpart (f), dated April 27, 2018, summarizing the future functionalities of the Commonwealth of Massachusetts Interoperable Radio System (CoMIRS) available through the planned digital upgrade.

- (a) Please identify and fully describe the role any future functionality in the CoMIRS system will play in the provision of "Enhanced 911 service," defined in G.L. c. 6A, § 18A as a service enabling end users/ subscribers of a communications service to reach the appropriate PSAP, with automatic number identification and automatic location identification by dialing the digits 9-1-1.

AGO-1-3

Please refer to your response to DTC-1-7, subpart (c), dated April 27, 2018, summarizing the projected cost of upgrading CoMIRS.

- (a) Please identify and fully describe whether and how the estimated \$87,569,000 to build a digital radio network of 100 new or upgraded radio sites throughout the Commonwealth will be used to provision "Enhanced 911 service," defined in G.L. c. 6A, § 18A as a service enabling end users/subscribers of a communications service to reach the appropriate PSAP, with automatic number identification and automatic location identification by dialing the digits 9-1-1.
- (b) Please identify and fully describe whether and how the estimated \$75,037,100, representing the cost of over 15,000 radio units that upon digital upgrade will need to be replaced, will be used to provision "Enhanced 911 service," defined in G.L. c. 6A, § 18A as a service enabling end users/subscribers of a communications service to reach the appropriate PSAP, with automatic number identification and automatic location identification by dialing the digits 9-1-1.

AGO-1-4

Please refer to your response to DTC-1-7, subpart (h), dated April 27, 2018 summarizing the capital and operating expenses of the CoMIRS system, from 2005 through 2016.

- (a) Please indicate the amount of each year's capital or operating expenses shown in this response that was either incurred initially and paid by the State 911 Department or reimbursed by the State 911 Department, from available funds in the Enhanced 911 Fund.

(b) Describe fully the CoMIRS equipment, facilities or services that were paid/reimbursed between 2005 and 2016 from the Enhanced 911 Fund.

AGO-1-5

Please provide a copy of the State 911 Department's annual report to the DTC, for Fiscal Years 2013, 2014, 2015, 2016 and 2017, on the financial condition of the Enhanced 911 Fund and on the assessment of new developments affecting the enhanced 911 system, as required by G.L. c. 6A, § 18H (b).

AGO-1-6

Please provide a copy of the State 911 Department's annual report to the General Court for Fiscal Years 2013 through 2017 on both planned future expenditures and past Fund expenditures, as required by G.L. c. 10, § 35JJ (b). Please supplement your response when the report for Fiscal Year 2018 becomes available.

Dated: May 10, 2018