



The Commonwealth of Massachusetts  
EXECUTIVE OFFICE OF PUBLIC SAFETY AND SECURITY  
**STATE 911 DEPARTMENT**

151 Campanelli Drive, Suite A ~ Middleborough, MA 02346  
Tel: 508-828-2911 ~ TTY: 508-828-4572 ~ Fax: 508-828-2585  
[www.mass.gov/e911](http://www.mass.gov/e911)



**CHARLES D. BAKER**  
*Governor*

**THOMAS A. TURCO, III**  
*Secretary*

**KARYN E. POLITO**  
*Lieutenant Governor*

**FRANK POZNIAK**  
*Executive Director*

May 3, 2021

VIA ELECTRONIC MAIL

Shonda D. Green, Department Secretary  
Massachusetts Department of Telecommunications and Cable  
1000 Washington Street, Suite 820  
Boston, Massachusetts 02118-6500

RE: Petition of the State 911 Department for Approval of Fiscal Year 2020 Expenditures, and  
Approval of Fiscal Year 2021 Development Grant Amount

Dear Ms. Green:

In connection with the above matter, and in accordance with the Department of Telecommunication and Cable's Order 20-1, dated May 26, 2020, the State 911 Department hereby provides the Executive Office of Technology Services and Security COMIRS Fiscal Year 2021 – 3rd Quarter Report (Reporting Period January 1, 2021 – March 31, 2021), regarding the use and the expenditure of Enhanced 911 Funds.

Finally, please find a Certificate of Service related to this submission.

Thank you for your attention to this matter.

Very truly yours,

Dennis J. Kirwan  
Dennis J. Kirwan  
General Counsel

Enclosures

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

Petition of the State 911 Department for Approval of Fiscal Year	)
2020 Expenditures and Approval of Fiscal Year 2021	)
Development Grant Amount	)

**CERTIFICATE OF SERVICE**

I hereby certify that, on behalf of the State 911 Department in the above- captioned proceeding, I forwarded a copy of the attached Executive Office of Technology Services and Security COMIRS Fiscal Year 2021 – 3rd Quarter Report (Reporting Period January 1, 2021 – March 31, 2021), regarding the use and the expenditure of Enhanced 911 Funds to those included on the Service List.

Respectfully submitted,

Dennis J. Kirwan  
Dennis J. Kirwan  
General Counsel  
State 911 Department  
151 Campanelli Drive, Suite A  
Middleborough, Massachusetts 02346  
Telephone: (508) 821-7223  
Email: dennis.j.kirwan@state.ma.us  
Facsimile: (508) 828-2585

Dated: May 3, 2021



# EXECUTIVE OFFICE OF TECHNOLOGY SERVICES & SECURITY

COMMONWEALTH OF MASSACHUSETTS | 1 ASHBURTON PLACE, 8TH FLOOR, BOSTON, MA 02108

**CHARLES D. BAKER**  
Governor

**CURTIS M. WOOD**  
Secretary

**KARYN E. POLITO**  
Lieutenant Governor

April 30, 2021

Frank Pozniak  
Executive Director  
State 911 Department  
151 Campanelli Dr., Suite A  
Middleborough, MA 02346

**RE: FISCAL YEAR 2021 - COMIRS 3<sup>RD</sup> QUARTER REPORT**  
(Reporting Period January 1, 2021 – March 31, 2021)

Dear Director Pozniak,

In accordance with Department of Telecommunication and Cable (hereinafter DTC) Order 18-2 dated June 29, 2018, DTC Order 20-1 dated May 26, 2020, and the State 911 Department's Guidance Document as issued to the Executive Office of Technology Services and Security (hereinafter EOTSS) on or about September 9, 2020, I respectfully submit the Fiscal Year 2021 3<sup>rd</sup> Quarter Report for the Commonwealth's project to modernize, improve and expand its interoperable public safety radio system (hereinafter the CoMIRS Project).

The 3<sup>rd</sup> Quarter of Fiscal Year 2021 was highlighted by the CoMIRS Program Management Office's (PMO's):

- extension of the Part 2 network RFR bid response date, and continuing effort to provide all qualified bidders a scheduled weekly opportunity to clarify bid requirements and understand existing radio infrastructure,
- ongoing review, analysis and processing of the *Radio Upgrade Grant* applications,
- continued effort to migrate the Franklin County public safety agencies onto the CoMIRS network,
- identification, coordination, and licensure of frequencies to support the future CoMIRS system,
- continued effort to resolve a public safety radio coverage issue along Route 1 in Saugus,
- took note of the federal law change that eliminated the mandated auction of the 470-512 MHz spectrum,
- joined the State 911 Department at its annual hearing in front of the Department of Telecommunication and Cable,
- monitoring and auditing of the project budget and expenditures.

**EXTENSION OF THE PART 2 NETWORK RFR BID RESPONSE DATE, AND CONTINUED COMMITMENT TO PROVIDING ALL QUALIFIED BIDDERS A SCHEDULED WEEKLY OPPORTUNITY TO CLARIFY BID REQUIREMENTS:**

On October 30, 2020, the PMO posted the CoMIRS Modernization Part 2 Request for Response to COMMBUYS, as Bid# BD-21-1060-ITD-ITD00-55256, Agency Document Number PCR-21-00341. The

solicitation is entitled, “Commonwealth of Massachusetts Interoperable Radio System Modernization System Architecture and Implementation Services (CoMIRS Modernization Part 2 RFR)”. The CoMIRS Modernization Part 2 RFR solicits proposed system architectures, equipment lists, radio capabilities, implementation services and pricing for modernizing the radio network over the next several years. The RFR was open to those bidders who were pre-qualified pursuant to the Part 1 RFR.

As originally posted, the Part 2 RFR established a bid response deadline of January 15, 2021. On November 20, 2020, and at the request of one of the qualified bidders, the PMO extended the response deadline by sixty (60) days to March 15, 2021. The PMO granted the request to extend the response deadline, citing the comprehensiveness of the RFR and the complexity of the project. The PMO determined that it would be in the best interest of the Commonwealth to extend the deadline so to provide bidders the time necessary to prepare a response that was as complete and as thorough as possible. On February 8, 2021, the PMO received a second request from one of the qualified bidders, seeking to extend the RFR response date yet again; this time by an additional thirty (30) days. Once again, and citing the comprehensiveness of the RFR and the importance of providing all vendors the time they need to prepare a responsive, thoughtful and competitive proposal, the PMO agreed to extend the bid response date to April 14, 2021.

Upon bid closure, the PMO will begin to evaluate the submissions. Oral presentations are scheduled to begin on May 4, 2021 and run through May 28, 2021. The PMO hopes to identify the successful bidder sometime around June 1, 2021, and thereafter begin contract negotiations.

#### **ONGOING REVIEW, ANALYSIS AND PROCESSING OF THE *RADIO UPGRADE GRANT* APPLICATIONS:**

As of March 31, 2021, the PMO had received 54 *Radio Upgrade Grant* applications. All but two of these applications were filed by, or on behalf of, a single “Operable User”. The two applications filed on behalf of multiple Operable Users were both filed by the Franklin Regional Council of Governments (FRCOG). The FRCOG applications were reviewed, analyzed and awarded in the 3<sup>rd</sup> Quarter; all other applications remain in process, with awards scheduled for the 4<sup>th</sup> Quarter of Fiscal Year 2021.

The first FRCOG application was filed on behalf of the Greenfield-Montague Dispatch Center and the second on behalf of the sixty-one (61) separate Franklin County Operable Users. Although the Greenfield-Montague Dispatch Center grant was relatively straight forward, the application for the county’s Operable User radio replacements was far more complicated. For each radio that the FRCOG requested be replaced, the PMO conducted an assessment of that radio’s technical specifications, compared the total number of portable radios requested by the Operable User to the total number of personnel employed or assigned, and compared the total number of mobile radios requested to the total number of vehicles deployed by the Operable User. On January 20, 2021, the PMO ultimately approved a grant award for the Greenfield-Montague Dispatch Center in the amount of \$58,900.52, and on March 8, 2021, a separate award in the amount of \$3,008,489.77 for Franklin County Operable User subscriber units. These awards will support the replacement of the active non-compliant Greenfield-Montague Dispatch Center radios, as well as 843 active non-compliant portable radios and 439 active non-compliant mobile radios assigned to the Franklin County public safety community. These replacements will allow Franklin County to quickly transition from their failing communications network to CoMIRS resolving a rapidly escalating public safety emergency and assuring vital emergency communications and E911 dispatch and response in the region. Moreover, these new radios will also allow Franklin County to seamlessly transition from the current CoMIRS architecture to the new CoMIRS+P25 system when it is completed.

During the 3<sup>rd</sup> Quarter the PMO issued several supplemental guidance documents as enhancements to the CoMIRS *Radio Upgrade Grant Notice and Guidelines*. These guidance documents were publically posted on the CoMIRS web site, and are described below:

- Supplemental Guidance #1 (Issued January 29, 2021): This guidance document provides a mechanism whereby grant eligible applicants can request the deferment of grant disbursements until FY2022 in order to provide their respective communities sufficient time to appropriate and/or allocate funds to satisfy their financial responsibilities under the grant. It also amends the list of grant eligible applicants and allows all applicants to submit their applications in Fiscal Year 2021.
- Supplemental Guidance #2 (Issued February 19, 2021): This guidance document extends the filing deadline for Fiscal Year 2021 grant applications by three weeks to April 2, 2021. This extension was authorized after a number of grant eligible Operable Users requested additional time to complete their applications.
- Supplemental Guidance #3 (Issued March 19, 2021): This guidance document further explains the grantee's obligation to make sure that radios replaced with a radio purchased with grant funds be rendered incapable of further operation on the CoMIRS trunked system. Radios purchased with grant funds are intended to replace, not supplement, existing analog radios. This "one-for-one" rule is necessary to ensure that system demands do not exceed existing capacity.

#### **CONTINUED EFFORT TO MIGRATE FRANKLIN COUNTY PUBLIC SAFETY AGENCIES ONTO THE CoMIRS NETWORK:**

As stated above, a great deal of time was spent during the 3<sup>rd</sup> Quarter evaluating and processing the FRCOG's *Radio Upgrade Grant* applications. Franklin County's receipt of grant funded radios will facilitate the long awaited transition from their failing public safety communications network to the CoMIRS network.

In anticipation of the grant supported subscriber units being received by FRCOG, the PMO has been coordinating technical training and instructional sessions to help familiarize the Franklin County Operable Users with their equipment before it actually arrives. As explained in the 2<sup>nd</sup> Quarter Report, the PMO previously executed an Interdepartmental Service Agreement (ISA) with the Massachusetts State Police (MSP) for the purchase of eight "test radios". The MSP Radio Team has been using these test radios to conduct "train-the-trainer" sessions in Franklin County. In addition to providing radio familiarization tutorials, the MSP Radio Team has also been busy preparing channel configurations and programming code-plugs to help FRCOG expedite the deployment of the radios once they arrive.

The PMO and FRCOG leadership team continue to work collaboratively to address the governance and operational issues that define the transition of the county's public safety communication network to CoMIRS.

**IDENTIFICATION, COORDINATION, AND LICENSURE OF FREQUENCIES TO SUPPORT THE FUTURE CoMIRS SYSTEM:** The PMO, with the assistance of its engineering consultant Mission Critical Partners, continued its efforts to identify and coordinate frequencies to be used in the implementation and rollout of the new CoMIRS digital system. This effort has focused on identifying which currently licensed spectrum could be reused for the new system, identifying from various pools of available spectrum, additional frequencies for licensure, and coordinating the licensing of these additional frequencies with other radio users in the Commonwealth and in the region. The goal of this critical path activity, which maps to major activity 5.2.3 "Obtain Additional Spectrum" from the 2017 Strategy Report, is to obtain sufficient spectrum for the timely implementation of the CoMIRS+P25 system. In the 3<sup>rd</sup> Quarter the PMO approved payments totaling \$236,162.00 to the Association of Public-Safety Communications Officials International for the preparation and coordination of 34 FCC frequency applications. (These charges will appear in the quarterly budget chart when paid.) These applications will secure spectrum for both Implementation Stage 1 and Implementation Stage 2. Additional spectrum may be needed depending upon the nature of the bids in response to the CoMIRS Modernization Part 2 RFR.

**CONTINUED EFFORT TO RESOLVE A PUBLIC SAFETY RADIO COVERAGE ISSUE ALONG ROUTE 1 IN SAUGUS:** During the 3<sup>rd</sup> Quarter of Fiscal Year 2021, the PMO actively engaged Crown Castle for space on one of their managed towers, located at 57 Cheever Avenue, Saugus. This tower was recently identified by the PMO as a site that would satisfy the location and structural requirements necessary to resolve the Route 1 radio frequency (RF) coverage deficiencies. The PMO is hopeful that a Site License Agreement (SLA) and a Standard Contract Form will be agreed to and executed in the 4<sup>th</sup> Quarter of Fiscal Year 2021. The cost of the radio equipment to be installed at the Saugus site will be apportioned between the MSP and PMO. Equipment that will exclusively serve the current analog network will be funded by the MSP, while the equipment that will serve the new network will be funded through the Enhanced 911 Trust ISA. The cost of the new network equipment will be \$81,350.00, while the MSP portion will be \$22,540. Beyond the MSP's equipment expense of \$22,540, they will also assume the monthly licensing fee of \$3,000.00. The PMO expects this project to be completed late in the 4<sup>th</sup> Quarter of Fiscal Year 2021 or early Fiscal Year 2022.

**TOOK NOTE OF THE FEDERAL LAW CHANGE THAT ELIMINATED THE MANDATED AUCTION OF THE 470-512 MHZ SPECTRUM:**

On December 27, 2020 the President signed into law the "Don't Break Up The T-Band Act". This enactment eliminated a previous legislative mandate that the Federal Communications Commission reallocate and auction certain frequencies used by public safety agencies. During the 2020 DTC Hearing the Attorney General, as an intervener, expressed concern that the CoMIRS+P25 network would not be completed in sufficient time to accommodate those Commonwealth public safety agencies that would be displaced when the T-Band auction was conducted. This enactment effectively eliminates those concerns. To the extent any T-Band agencies may be interested in migrating to CoMIRS+P25 in the future, the PMO looks forward to considering such requests once the system architecture is complete and the governance and financial rubrics are promulgated.

**JOINED THE STATE 911 DEPARTMENT AT ITS ANNUAL HEARING IN FRONT OF THE DEPARTMENT OF TELECOMMUNICATION AND CABLE:**

On April 7, 2021, the PMO, Secretary Curtis Wood and Assistant Secretary Matthew Moran joined the State 911 Department at its annual oversight hearing in front of the Department of Telecommunication and Cable. At the request of the State 911 Department the PMO prepared two responses to the DTC first set of information requests and Secretary Wood and Project Manager Scott Bailey answered a series of questions posed by the DTC hearing officer and the Assistant Attorney General representing the Office of Attorney General in its capacity as an intervener.

On April 7, 2021, the Attorney General's Office filed their comments with the Department of Telecommunication and Cable. Respectfully, the PMO offers the following observations:

1. The PMO has and continues to embrace the projection advanced in the *Commonwealth's 2017 Interoperable Radio System Study*, that the network buildout will take five and one-half years, commencing with the availability of funding. Once final network build-out contract has been negotiated the PMO will refresh the project timeline and cost estimate.
2. Thus far the FY21 expenditures are far less than what was originally budgeted. When the PMO prepared its budget for FY21 it assumed that the network RFR would close in January and that funds would be needed to begin the network build-out in FY21. The RFR process has taken more time than anticipated. The associated reality and intended consequence however, is that the PMO has been able to spend more time with the bidders answering their questions and clarifying the RFR requirements. The PMO contends that the additional time invested in the RFR process has made the bid process far more meaningful and the responses far more thorough. Once the final contract is executed, the PMO fully anticipates a rapid and significant increase in progress and expenditures. The PMO will coordinate with the State 911 Department to modify the project

when we close FY21 and will adjust out-year spending projections based on the information available at that time.

**MONITORING AND AUDITING OF THE PROJECT BUDGET AND EXPENDITURES:**

During the 3<sup>rd</sup> Quarter of Fiscal Year 2021, the PMO, the Director of Finance for the State 911 Department and the Director of Finance for EOTSS have collectively and individually monitored the program's expenditures. Expenditures that were authorized and have been paid from the Enhanced 911 Trust account during the 3<sup>rd</sup> Quarter of Fiscal Year 2021 are reported below. The Enhanced 911 Trust was the exclusive source of funding for these expenditures.

Row Labels	Sum of Amount
<b>80000911</b>	<b>\$ 248,400.63</b>
<b>5930</b>	<b>\$ 236,615.10</b>
CROCKER COMMUNICATIONS INC	\$ 3,514.00
U01	\$ 3,514.00
CROWN CASTLE FIBER LLC	\$ 2,940.00
U07	\$ 2,940.00
FRINGE BENEFIT COST RECOUPMENT	\$ 8,169.83
D09	\$ 8,169.83
INDIRECT COST RECOUPMENT	\$ 5,990.55
E16	\$ 5,990.55
MCINNIS CONSULTING SERVICES	\$ 32,907.18
U05	\$ 32,907.18
MISSION CRITICAL PARTNERS LLC	\$ 45,608.34
U11	\$ 45,608.34
STATE EMPLOYEE SALARY	\$ 32,880.00
A01	\$ 32,880.00
SWBAILEY CONSULTING LLC	\$ 104,605.20
U11	\$ 104,605.20
<b>5932</b>	<b>\$ 11,785.53</b>
MARCUS COMMUNICATIONS	\$ 11,785.53
U07	\$ 11,785.53
<b>Grand Total</b>	<b>\$ 248,400.63</b>

In the event there are any questions or if clarification concerning any aspect of this report would be helpful, the PMO would be pleased to assist. Inquiries may be directed to Assistant Secretary Matthew Moran at (617)-626-4400 or email at [Matthew.E.Moran@mass.gov](mailto:Matthew.E.Moran@mass.gov).

Respectfully,

*Curtis M. Wood*

Curtis M. Wood (Apr 30, 2021 16:06 EDT)

Curtis Wood,  
Secretary of Technology Services and Security  
Commonwealth Chief Information Officer