



South Worcester County Communications Center

357 Main Street • Webster, MA 01570 • 508-943-1212
Serving the Towns of Webster and Dudley, Massachusetts



Gregory Lynskey, Communications Center Director

October 15, 2023

Shonda Green, Secretary
Department of Telecommunications and Cable
1000 Washington Street, Suite 600
Boston, MA 02118-6500

To Whom it May Concern:

Please accept this written comment into the record in support of the State 911 Department petition for approval to maintain the monthly enhanced 911 surcharge at \$1.50 under docket D.T.C. 23-3.

As the Communications Center Director of the South Worcester County Communications Center (SWCCC), a Regional Emergency Communications Center serving the towns of Webster and Dudley, I have seen first hand the enormous benefits of the surcharge and the programs it allows the State 911 Department (the Department) to administer.

I believe it is important to note that the petition seeks to ensure level funding for the Department and its vital grant programs. The Department, which receives no state appropriation and is solely funded by the surcharge, is not seeking to increase the surcharge. Currently, the surcharge is set to revert to \$1.00 on January 1, 2024. This amount represents 2018 levels, a level which is impractical to successfully operate the Department and its programs in my opinion.

Again, from firsthand knowledge, I have seen the dramatic cost increases over the past several years that have impacted the SWCCC's operating budget, in fact, since 2018, my operating budget has seen a 30% increase itself. We would not have been able to maintain level service at these dramatic increases if not for the support of the State 911 Grant Programs.

The scheduled reversion of the surcharge represents a 33% DECREASE in funds. That type of decrease would only serve to decimate any budget, in particular, that of the Department and its grant programs. It would have a direct, detrimental impact on every Public Safety Answer Point (PSAP) and every community in the Commonwealth.

It is my understanding that the Department receives the funding from the surcharge as a result of Chapter 223 of the Acts of 2008, which set the initial surcharge at 75 cents and which statutorily requires the Department to administer its grant programs. The Department has only twice requested to increase this surcharge, and in the instant petition is simply seeking to maintain its level. There are very few, if any, of our day to day costs that have only seen modest increases twice in 15 years.

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On a personal note pertaining to the SWCCC, we have been extremely fortunate to have received approximately \$7,990,000 in grant funding from the Department since 2013. We have received approximate \$3,000,000 from the Regional Development Grant for capital type expenses that were critical to the establishment and sustainability of the SWCCC. Additionally, we have received approximately \$4,990,000 in funds from the Support & Incentive Grant, Training Grant, and Emergency Medical Dispatch Grant, all of which are utilized toward operational costs, primarily personnel expenses, to offset the expense to our member communities who are already cash strapped. The establishment of the SWCCC and its continued operation today would most certainly not be possible without the grant funding we have been so fortunate to have received.

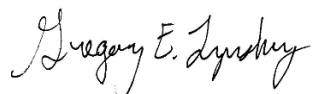
A reduction in the surcharge would decimate the grant programs offered by the Department. In fact, by 2025, the grant programs would be reduced by \$56.7 million with further reductions in subsequent years due to projected \$62 million in annual reduction in revenue if the surcharge reverts to \$1.00.

Not only do I have the firsthand knowledge as a user and beneficiary of the Department, I am also a regular attendee at the State 911 Commissions meetings where anyone who attends is able to hear all the good the Department does not just for its PSAPs but for the benefit of every citizen of the Commonwealth who may ever need emergency services.

It is certainly a breath of fresh air to see first hand that the funds collected from the Enhanced 911 Surcharge go directly towards providing a high quality 911 program throughout the state and supporting the PSAPs in providing a high quality service. Massachusetts is one of the only states in the country with a statewide, state administered Next Generation 911 program, with many states decades behind. It is no accident that this is the case due to the proper administration of the surcharge revenue. Massachusetts should be very proud that it does not have the fate of a number of states, even some of our neighbors, who appear on the Federal Communications Commission's 911 fee report as having improperly diverted 911 surcharge revenue.

In closing, I ask for your support of the Department's petition. Sure, the reversion of the surcharge would save the consumer \$6.00 per year, but it would dramatically impact the safety and security of all consumers by decimating funding to the 911 PSAPs, the First First Responders that the same citizens reach in their time of their emergency.

Sincerely,



Gregory Lynskey
Communications Center Director