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EXECUTIVE OFFICE OF PUBLIC SAFETY AND SECURITY
STATE 911 DEPARTMENT
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VIA ELECTRONIC MAIL AND OVERNIGHT MAIL

March 18, 2025

Shonda D. Green, Secretary
Massachusetts Department of Telecommunications and Cable
One Federal Street, Suite 0740
Boston, Massachusetts 02110-2012

RE: Petition of the State 911 Department for Approval of Fiscal Year 2025 Expenditures, and
Approval of Fiscal Year 2026 Development Grant Amount.

Dear Ms. Green:

Pursuant to Massachusetts General Laws (“G.L.”) Chapter 6A, §18H(b), the State 911 Department (“Department”) hereby submits this Petition of the State 911 Department for Approval of Fiscal Year 2025 Expenditures, and Approval of Fiscal Year 2026 Development Grant Amount.

The Department offers the following in support of the Petition.¹

I. FISCAL YEAR 2025 EXPENDITURES

The Department is required to seek the approval of the Department of Telecommunications and Cable (“DTC”) for projected total expenditures that exceed total expenditures of the previous fiscal year by ten (10) per cent or more. *See* G.L. chapter 6A, §18H(c), which provides in pertinent part, as follows:

The department shall seek the approval of the department of telecommunications and cable for projected total expenditures that exceed total expenditures of the previous fiscal year by ten (10) per cent or more. The department of telecommunications and cable may investigate the

¹Pursuant to G.L. c. 6A, § 18H(b), the Department is required to report annually to the DTC on the financial condition of the Enhanced 911 Fund and on the Department’s assessment of the new developments affecting the enhanced 911 system. The Department respectfully requests that the DTC treat this petition as satisfying that requirement for Fiscal Year 2024.

reasonableness of the expenditures and shall conduct its review and issue a decision within 90 days from the date the department files its request for approval, but the request for approval shall be deemed approved if the department of telecommunications and cable does not issue its decision within such 90 days. The department of telecommunications and cable shall notify the department of its intent to investigate within 20 days of the date the department files its request for approval. The department's request for approval shall be deemed approved in the absence of the department of telecommunication and cable's notification to the department of its intent to investigate. If the department of telecommunication and cable notifies the department that it intends to investigate an expenditure, the department of telecommunications and cable may hire experts to assist in its investigation. The reasonable cost of the experts shall be charged to the Enhanced 911 Fund, but in no event shall such cost exceed \$200,000, which may be adjusted to reflect changes in the consumer price index.

An itemized breakdown of the Department's projected expenditures for Fiscal Year 2025 is set forth in Attachment A, along with the final expenditures for Fiscal Year 2024, attached hereto and made a part hereof. The expenditures are described in more detail below.

As set forth in Attachment A, the projected expenditures of the Department for Fiscal Year 2025 are \$280,141,860. This projected amount is more than ten (10) per cent greater than the actual expenditures of \$154,781,122 for Fiscal Year 2024. Accordingly, the Department hereby requests DTC approval of Fiscal Year 2025 projected expenditures.

II. ENHANCED 911 FUND

The legislation provides that the Department shall disburse funds from the Enhanced 911 Fund for prudently incurred expenses associated with the following:

. . . the lease, purchase, upgrade or modification of primary and regional PSAP customer premises equipment and the maintenance of such equipment; network development, operation and maintenance; database development, operation, and maintenance; training of 911 telecommunicators regarding the receipt and use of enhanced 911 service information; education of consumers regarding the operation, limitation, role and responsible use of enhanced 911 service; grants associated with enhanced 911 service as set forth in subsection (i) and any other grant approved by the department associated with providing enhanced 911 service in the commonwealth; the recurring and nonrecurring costs of communication services providers in providing enhanced 911 service in the commonwealth to the extent required by federal or Massachusetts law or regulation or federal or Massachusetts agency decision or order; and other expenses incurred by the state 911 department in administering and operating the enhanced 911 system in the commonwealth. *See G.L. c. 6A, § 18B(f).*

As set forth more fully below, the Department's expenditures are prudently incurred, statutorily authorized expenses necessary to administer and operate the 911 system in the Commonwealth.

Projected Revenues and Expenditures

The Department has projected revenues and expenditures for the Enhanced 911 Fund for Fiscal Year 2025 through Fiscal Year 2029. See Attachment B.

Projected Surcharge Revenues

The revenue projection methodology is consistent with the Department's past revenue projection method. The subscriber line counts are based on the average number of subscribers available at the date of this filing and assumes no change in the number of access lines subject to the surcharge. The estimate of revenues for each fiscal year is derived from the beginning fund balance, the estimated net revenue, and interest earned. The total estimated revenue is reached by adding to the beginning fund balance, the estimated total net revenue and the estimated interest earned.

Beginning Fund Balance

The beginning fund balance of the Enhanced 911 Fund is arrived at by carrying over the Enhanced 911 Fund balance from the prior fiscal year.

Net Revenue

The estimate of the net revenue for each fiscal year is based on multiplying the then current surcharge and the then estimated number of subscribers and subtracting carrier administrative fees. The projection assumes a one (1) per cent carrier administrative fee.

Interest Earned

The Department does not earn interest on the total Enhanced 911 Fund balance. Interest is earned only on the invested funds. The interest earned each month is then reinvested, thereby increasing the invested funds. To estimate the interest earned, the Department utilizes the average interest rate as provided by the Office of the State Treasurer in its monthly reporting on the Massachusetts Municipal Depository Trust. The Department has applied an annual rate of 5.07 per cent as an estimate of the interest rate to be applied, on a monthly basis, to the invested fund balance.

Projected Expenses

The following is a description of the budgeted categories of expenses for the Enhanced 911 Fund. These expenses are prudently incurred and are necessary to meet the legislation's directives.

Administration

Salary Costs

The Department's projected expenses include salaries and overhead costs for employees, excluding salary costs associated with the operation of the wireless and 911 centers since those costs are included in the line item for each such center discussed below, and contract employees. The projected salary costs are attributable to full time employee ("FTE") and contract positions. These positions are necessary to fulfill the Department's statutory obligations. The Department has projected salary expenses that reflect contractual cost of living and step increases and estimated cost of living adjustments that have been and may be negotiated by the National Association of Government Employees union and the Commonwealth.

Agency Expenses

The category of agency expenses includes employee reimbursements, administrative expenses, operational supplies, utilities/space rental, consultant services, operational services, equipment purchases, lease, maintenance, and repair services, building maintenance and repairs, and IT services and equipment.

Capital Project

The Department's projections include funding for the replacement of radio consolettes at the North Shore Regional 911 Center (NSRC), relocation and expansion of the Department's wireless and training centers, radio systems at the wireless center and the NSRC, upgrade of the fire alarming, a replacement vehicle, building repairs, software, public safety equipment, audio visual equipment, data conversion, furniture and equipment for a new training facility in the northern/eastern part of the Commonwealth, and upgrade of information technology infrastructure.

Grant Programs

The legislation requires the Department to develop and administer grant programs to assist public safety answering points ("PSAP") and regional emergency communications centers ("RECC") in providing enhanced 911 service and to foster the development of regional PSAPs, regional secondary PSAPs, and RECCs. *See G.L. c. 6A, 18B(i).* The legislation requires that the Department fund the following grant programs: the PSAP and Regional Emergency Communications Center Training Grant ("Training Grant"); the PSAP and Regional Emergency Communication Center Support Grant ("Support Grant"); the Regional PSAP and Regional Emergency Communication Center Incentive Grant ("Incentive Grant"); the Wireless State Police PSAP Grant; and the Regional and Regional Secondary PSAP and Regional Emergency Communications Center Development Grant ("Development Grant"). *See G.L. c. 6A, § 18B(i)(1)-(5).* The legislation also permits the Department to introduce new grants associated with providing enhanced 911 service in the Commonwealth. *See G.L. c. 6A, § 18B(f).* As discussed below, as permitted by the legislation, in 2011, the Department introduced a new grant, the Emergency Medical Dispatch ("EMD") Grant.² The EMD Grant was renamed the EMD/Regulatory

² The EMD Grant was approved by the DTC by Order dated May 27, 2011 in D.T.C. 11-2.

Compliance Grant in Fiscal Year 2014. In Fiscal Year 2020, the Grant went back to being named the EMD Grant. Also, as discussed below, and as permitted by the legislation, in 2023, the Department introduced a new grant, the Telecommunicator Emergency Response Taskforce (TERT) Grant.³

The legislation provides that the State 911 Commission (“Commission”) shall approve all formulas, percentages, guidelines, or other mechanisms used to distribute these grants. *See G.L. c. 6A, § 18B(a).* The eligibility requirements, purpose, use of funding, including categories of use of funds, application process, grant review and selection process, and grant reimbursement process for each of these grants are set forth in the Grant Guidelines that are approved by the Commission.

Training Grant

The Training Grant reimburses primary PSAPs, regional PSAPs, regional secondary PSAPs, and RECCs for allowable expenses related to the training and certification of enhanced 911 telecommunicators.

The Department’s projections strive to maintain a funding level for the Training Grant to provide sufficient funding for primary PSAPs, regional PSAPs, regional secondary PSAPs, and RECCs to meet the minimum training and certification requirements for enhanced 911 telecommunicators.

Emergency Medical Dispatch Grant

The purpose of the Department’s EMD Grant is to reimburse primary PSAPs, regional PSAPs, regional secondary PSAPs, and RECCs, for allowable expenses relating to emergency medical dispatch services provided through a certified emergency medical dispatch resource, emergency medical dispatch protocol reference systems (EMDPRS), and for allowable expenses for other emergency medical dispatch and quality assurance of emergency medical dispatch services.

The Department’s projections strive to maintain a funding level for the EMD Grant to provide sufficient funding for primary PSAPs, regional PSAPs, regional secondary PSAPs, and RECCs to meet the minimum requirements governing EMD.

Support and Incentive Grants

The Support and Incentive Grants provide funding to primary PSAPs, regional PSAPs, regional secondary PSAPs, and RECCs for allowable expenses related to enhanced 911 personnel and equipment costs. In addition to amounts allocated as part of the Support Grant, incentive funds are awarded to regional PSAPs and RECCs that serve multiple communities.

The Department’s projections present a funding level for the Support Grant to provide funding for primary PSAPs, regional PSAPs, regional secondary PSAPs, and RECCs for personnel, equipment, and other allowable expenses. Further, in response to Chapter 177 of the Acts of 2022, the Support Grant, beginning in FY 2024, provides funding to primary PSAPs, regional PSAPs,

³ The TERT Grant was approved by the DTC by Order dated June 14, 2023 in D.T.C. 23-2.

regional secondary PSAPs and RECC that dispatch mobile behavioral health crisis response services.

The legislation requires that the Incentive Grant shall provide regional PSAPs and RECCs with funds, in addition to amounts allocated as part of the Support Grant, to be used for reimbursement of allowable expenses. *See G.L. c. 6A, §18B(i)(4).* The legislation uses a formula that applies a specified percent of total surcharge revenues for the previous fiscal year based on the number of municipalities to be served by the regional PSAP or RECC. *See G.L. c. 6A, § 18B(i)(4).*

The Department's projections present a funding level for the Incentive Grant to provide additional funding for regional PSAPs and RECCs for personnel, equipment, and other allowable expenses, and to allow the Department to meet its statutory obligations to maximize effective enhanced 911 services and regional interoperability and will further the Department's goals of increased regionalization which will, in turn, lead to a more efficient and effective use of resources and improve public safety.

Wireless State Police PSAP Grant

Currently, 911 calls placed from wireless callers in western Massachusetts, not otherwise assigned, are routed to a wireless state police PSAP for directly dispatching emergency response services or transferring the calls to local PSAPs for local police, fire, and emergency medical services dispatch.

The Wireless State Police PSAP Grant reimburses the wireless state police PSAP at Northampton for allowable expenses related to training, enhanced 911 personnel, and equipment costs. The Department's projections present the funding level for the Wireless State Police PSAP Grant, providing funding for allowable expenses.

Telecommunicator Emergency Response Taskforce (TERT) Grant

The TERT program is designed to support 911 communications centers requiring assistance. TERT deployments assist PSAPs that are stretched beyond their capabilities as the result of an unprecedented event. The TERT program helps provide much-needed relief to dispatchers. The Department has developed TERT Grant Guidelines, to allow for the continued operation of the TERT program throughout the Commonwealth, as well as a curriculum and certification process for telecommunicators. This initial TERT Grant began on July 1, 2023 and will run through June 30, 2026.

TERT members/teams typically respond to a PSAP when an agency needs a team due to a major event or special circumstances. The purpose of TERT is to provide relief to personnel of a communications center that has experienced a major event to augment the staffing of that center. The TERT can be activated in instances, which may include, natural disasters such as hurricanes, large wildfires, tornados, coverage for line of duty deaths, augment staffing due to widespread illness in center, staff relief after major events, including for Critical Incident Stress Management, or other instances as approved by the Department.

Development Grant

The Development Grant supports the development and startup of regional PSAPs, regional secondary PSAPs, and RECCs, including the expansion or improvement of existing regional PSAPs and RECCs. Since the inception of the grant programs in Fiscal Year 2009, the Department has witnessed a significant interest in regionalization among the PSAPs and RECCs. Through the Development Grant, the Department has provided funding for a number of significant regionalization projects. The Department has received requests for funding and has awarded funding for feasibility studies, construction, and equipment for proposed regional PSAPs and RECCs; and construction to expand and new equipment for existing regional PSAPs and RECCs. The regional projects funded under this Grant are often complex and are completed over multiple fiscal years. The expenditures are recorded in the fiscal year in which they are incurred. Grants funded under the Development Grant, due to their complexity, often cross fiscal years. The Department's projections maintain the funding level for the Development Grant to \$50 million to provide funding for these important regionalization efforts. These projections also contain funding to support those projects awarded under a prior fiscal year grant program that have been extended through June 30, 2025. There are currently two hundred (200) PSAPs in the Commonwealth, with sixty-four (64) PSAPs that have become regionalized since the Development Grant program began. The Department expects that fifteen (15) additional PSAPs will regionalize over the next five (5) years. The Department is continuing to see an increase in interest in either joining an existing RECC or in creating a new RECC that serves multiple communities.

9-1-1 Administration & Operation

Map Data

Through an authorized chargeback and interdepartmental service agreement between the Department and the Commonwealth's Office of Geographic Information ("MassGIS"), MassGIS provides updated, synchronized mapping data and information to the Department for use by PSAPs. As part of ongoing maintenance, MassGIS will continue updating the street database by adding missing streets and correcting erroneous streets. This is part of the core component of the GIS data used in support of the Next Generation 911 system. MassGIS acquires aerial imagery used for verification of streets and structures as part of the maintenance effort. MassGIS will contract with an outside vendor to identify the roofline of every structure in the Commonwealth and provide an outline of every building. This is necessary to attach street addresses to structures. Parcel data creation will continue to be part of the workflow process necessary to keep the data current. This entails collecting digital and paper maps and incorporating individual parcel line work into the statewide data set. Once new parcel data has been incorporated, MassGIS will use that data to update emergency service zones that will ultimately be used to route 911 calls to the proper PSAP. The services in support of Next Generation 911 consist of updated, synchronized mapping data and information and maintenance for the database and aerial imagery, and updates

to the emergency services zones. These services are critical to the base operation of the Next Generation 911 system.

Next Generation 911 Recurring and Non-Recurring Costs

A contract for Next Generation 911 products and services was executed with General Dynamics Information Technology (“GDIT”) on August 4, 2014. The deployment of the Next Generation 911 system began in Fiscal Year 2017 and concluded in December 2017. All Massachusetts PSAPs are now operating within the Next Generation 911 system.

On April 29, 2019, the contract for Next Generation 911 products and services executed with GDIT was assigned to Comtech NextGen LLC. At that time the option to renew for an additional five (5) years was also executed, extending the contract for Next Generation 911 products and services through August 3, 2024.

The Department posted an RFR (bid number BD-23-1044-EPS90-1044E-84666) for the provision of Next Generation 911 products and services for the successor contract. On August 1, 2024, the Department awarded the five-year contract to NextGen Communications, Inc. (Comtech).

Radio Infrastructure

In 2018, the Department received authorization from the DTC to increase the Enhanced 911 Surcharge for a period of five years to fund several approved initiatives. Among the initiatives approved was the modernization, upgrade, and expansion of the Commonwealth’s Public Safety Interoperable Radio System (see DTC. Order 18-2). As stated by the DTC in its 20-1 Order, “[t]he Commonwealth of Massachusetts Interoperable Radio System (“CoMIRS”) is an existing state-wide interoperable radio network that serves as the primary communications tool for many public safety first responders including the Massachusetts State Police. As such, PSAPs utilize the CoMIRS network to quickly and efficiently dispatch and relay emergency 911 information to first responders. Because of PSAPs’ direct reliance on CoMIRS and the fact that CoMIRS is used for 911 dispatch, the DTC has ruled that certain dispatch-related costs of the CoMIRS network are appropriately reimbursed by the [Enhanced 911 Trust] Fund.”

The “CoMIRS+P25” project is managed and funded through a formal collaborative business relationship between the Department and the Executive Office of Technology Services and Security (“EOTSS”). Project management has been conferred upon EOTSS, while oversight of the financial transactions remains with the Department. To ensure the proper use and oversight of project expenditures, the Department mandates that EOTSS file quarterly and annual reports with the Department. All quarterly and annual reports have been forwarded to the DTC for review and inclusion in the respective docket.

Since filing its last petition on March 7, 2024, the Department reports the following Radio Infrastructure Project activities:

- The CoMIRS PMO reported the completion and approval of the following contract project milestones based on submitted deliverables from the project prime contractor, Motorola Solutions:
 - Integration 6 - GADI – Services (Integration-6B): This project milestone was approved on June 13, 2024, in the amount of \$37,158.00, for services related for the installation and training for the use of the GADI tool to remotely manage radio patches.
 - 8-2 Final Design (Phases 1B+ NTP) (Services-8-2B2): This project milestone was approved on September 25, 2024, in the amount of \$143,414.00, for the completion of final design for the communications sites planned for Phases 1B, 1C, and 1D of IS-1 (together Phases 1B, 1C, and 1D are referred to as “Phase 1B+”). The CoMIRS PMO issued this milestone approval based on substantial completion of Phase 1B+ lease exhibits and the full CoMIRS+P25 IS-1 backhaul network design.
 - 8-4 System Installation (30%, Ph1A, Part 1B) (Infrastructure-8-4A1B): This project milestone was approved on November 12, 2024, in the amount of \$3,800,808.00, for the substantial completion of civil construction for 23 Phase 1A communications sites based on ATP documentation and agreed upon punch list items.
 - 8-3 System Staging and Delivery (25%, Ph1B, MW and DC) (Infrastructure-8-3B2): This project milestone was approved on December 20, 2024, in the amount of \$1,224,092.00, for the successful completion of microwave staging at Aviat facilities in Texas during the week of December 16, 2024. This milestone covers microwave and DC power plant orders for Phase 1B.
 - 8-3 System Staging and Delivery (25%, Ph1C, MW and DC) (Infrastructure-8-3C2): This project milestone was approved on December 20, 2024, in the amount of \$612,046.00, for the successful completion of microwave staging at Aviat facilities in Texas during the week of December 16, 2024. This milestone covers microwave and DC power plant orders for Phase 1C.
 - 8-3 System Staging and Delivery (25%, Ph1D, MW and DC) (Infrastructure-8-3D2): This project milestone was approved on December 20, 2024, in the amount of \$612,046.00, for the successful completion of microwave staging at Aviat facilities in Texas during the week of December 16, 2024. This milestone covers microwave and DC power plant orders for Phase 1D.
 - To date, 20 of 55 contract milestones (or 36%) have been approved, totaling \$33,184,847.00 (42% of the fixed price contract total).
- EOTSS approved the following contract Change Order with Motorola Solutions. Change orders are used, in part, to adjust the scope of services included in the fixed price deliverables due from with Motorola Solutions.
 - Change Order 004 (CO 004) is a multi-part change order that addresses aggregate, to-date changes to the planned microwave network supporting the CoMIRS+P25 communications sites and the security systems that secure individual communications sites from unauthorized access or property damage. The total cost of Change Order 004 is \$1,267,432.79, to be billed to Project Allowances.

Payments due to Motorola Solutions resulting from CO 004 are to be paid via Task Order 027. Change Order 004 was approved on June 28, 2024. There was no change to the overall value of the Motorola Solutions contract (\$97,632,394.00, inclusive of the Allowance Budget).

- Additional change orders for changes to scope in Phases 1B, 1C, and 1D are expected starting in the spring for 2025.
- The CoMIRS PMO reported the completion and approval of the following Task Orders based on submitted deliverables and services provided from the project prime contractor, Motorola Solutions. Task Orders are used to approve, track, and pay for changes of scope from the agreement originally entered with Motorola Solutions. Task Orders are paid for from the Project Allowance Budget.
 - Task Order 012 1B+ Foundation Mapping & Geotech, approved for payment on December 7, 2023, in the amount of \$138,048.78
 - Task Order 004 Tower Remediation Design, approved for payment on March 29, 2024, in the amount of \$3,109.76
 - Task Order 006 NEPA Studies, approved for payment on March 29, 2024, in the amount of \$6,402.44
 - Task Order 009 NEPA Studies, approved for payment on March 29, 2024, in the amount of \$2,439.02
 - Task Order 023 Brimfield Access Improvements, approved for payment on March 29, 2024, in the amount of \$27,283.41
 - Task Order 026 Framingham GHQ Generator, approved for payment on March 29, 2024, in the amount of \$90,323.41
 - Task Order 013 3rd Party Pre-Construction Services & Documents, approved for payment on May 15, 2024, in the amount of \$6,073.17
 - Task Order 018 Mt Toby New DC Power, approved for payment on May 15, 2024, in the amount of \$44,547.17
 - Task Order 031 Brimfield Generator Foundation Relocation, approved for payment on May 15, 2024, in the amount of \$35,631.20
 - Task Order 022 Charlton MassDOT Engineering, approved for payment on May 16, 2024, in the amount of \$3,384.10
 - Task Order 033 Microwave Path Studies (Phase 1B+), approved for payment on May 16, 2024, in the amount of \$123,024.39
 - Task Order 028 Phase 1A Misc Site Costs, approved for payment on June 21, 2024, in the amount of \$48,616.73
 - Task Order 030 Site Visits and Path Studies, approved for payment on June 21, 2024, in the amount of \$125,631.22
 - Task Order 027 Change Order 004 Adjustments, approved for payment on August 12, 2024, in the amount of \$594,802.48
 - Task Order 027 Change Order 004 Adjustments, approved for payment on August 16, 2024, in the amount of \$77,827.84
 - Task Order 003 Fixed Cost SOW Changes from CO 003, approved for payment on August 22, 2024, in the amount of \$94,091.64
 - These 16 task order payments total \$1,421,236.76. These task orders are tracked across the following Allowance categories:

- Backhaul Improvements (\$717,826.87)
 - Permitting, NEPA & Compliance (\$8,841.46)
 - Site Improvements (\$543,952.62)
 - Tower Remediation (\$150,615.81)
- Through February 2025, \$11,848,099.65 (63.7%) remains unencumbered in the Project Allowances Budget. Several change orders and task orders are expected in 2025 that are proposed to be charged to Project Allowances.
- The CoMIRS+P25 Project activities during calendar year 2024 focused on construction or modification of communications sites and the installation of antenna systems, microwave dishes, fiber circuits, security system, communications shelters, backup power systems and related equipment.
 - Sites are approved for construction when the site has passing FAA and NEPA studies, passing tower structural analyses, approved construction drawings, approved microwave path studies, approved electromagnetic energy (EME) studies, utility approvals, signed lease amendments or owner agreements, established fiber connectivity, site access improvements, and other construction prerequisites.
 - During calendar year 2024, the CoMIRS Modernization Project completed 43 additional lease exhibits, completed 15 additional construction drawings (sufficient for building permitting), and started construction at 24 additional communications sites. In total through February 2025, 86 lease exhibits have been finalized, 44 construction drawings have been completed, and 32 sites have started construction.
 - The CoMIRS Modernization Project has filed, or is in the process of filing, applications for new contracts or contract amendments with the tower owners at numerous communications sites. Contract negotiations are active and on-going.
 - Phase 1B, 1C, and 1D sites are in the design and lease exhibit phase of the project. Approval for the first two Phase 1B+ sites to move to construction was issued on January 29, 2025.
- The CoMIRS Modernization Project has actively overseen and managed a new contract for commercial communication towers, including the finalization of master service agreements with three major tower vendors in Massachusetts. Two additional master service agreements are in progress. New tower leases for this project and others may be entered into using this new contract vehicle.
- The CoMIRS PMO tracks major project metrics across 53 categories of project activities. Through the end of February 2025, the project to date metrics for key project activities include:
 - 105 site walks completed
 - 84 lease exhibits completed
 - 54 statements of work completed
 - 24 lease amendments completed
 - 2 new leases signed
 - 41 tower mappings completed
 - 20 foundation mappings completed

- 18 geotechnical analyses completed
- 47 structural analyses completed
- 6 tower remediation designs completed
- 4 custom mounts designed
- 8 foundation designs completed
- 61 NEPA reviews conducted
- 83 FAA screenings completed
- 4 FAA filings completed
- 1 site survey completed
- 43 100% construction drawings submitted
- 38 building permits pulled
- 39 notices to proceed to construction issued
- 32 site civil construction activities started
- 2 site clearing completed
- 4 generator foundation completed
- 1 fuel tank foundation completed
- 9 underground utilities installed
- 22 underground grounding completed
- 3 new shelters set
- 3 new generators set
- 2 fuel tank utility connections completed
- 1 above grade electrical completed
- 3 above grade ground completed
- 3 ice bridges installed
- 3 compound final grade completed
- 4 gates installed
- 24 antenna and line improvements completed
- 24 line sweeps completed
- 26 site restorations completed
- 9 new HVAC completed
- 22 site civil post-construction inspections completed
- 9 new microwave links installed
- 35 video surveillance completed
- 35 access control completed

- The CoMIRS PMO continues to meet with current CoMIRS core-connected users and other stakeholders to discuss the scope and status of the modernization project, the options available to user agencies for future core-connectivity, and the technical requirements for accessing the new system. Communications and coordination with future CoMIRS+P25 users are on-going.
- The CoMIRS PMO met with representatives of the Department of Conservation and Recreation on a multi-agency effort to consolidate communications equipment near the summit of Mt Wachusett in Princeton.

- The CoMIRS PMO is finalizing a program to prepare existing digital radios for the new CoMIRS+P25 system and the new digital system's required subscriber features. This program is limited to approved operable agencies. Award letters specifying which radios qualify under the program were distributed as part of the Radio Upgrade Grant Program (RUP). Additionally, the pricing for the program will be made available to agencies that did not participate in the RUP program, including numerous interoperable agencies.
- The CoMIRS PMO met with representatives from the City of Boston, the Boston Area UASI communities, and other state and municipal stakeholders to address the loss of interoperability introduced by the transition from the current, core-connect Metro 700 system to the new City of Boston city services system.
 - The CoMIRS PMO proposed an integrated system with multiple system administrators that would fully address these new interoperability issues. The CoMIRS PMO drafted a memorandum of agreement for the shared system and offered to be responsible for the financial costs and technical coordination needed to make the integrated system possible.
 - As of February 2025, there has been no commitment from the Boston Police Department to participate in this proposed shared system.
- The project timeline remains focused on completion of the system build-out in calendar year 2026. The remainder of Phase 1A sites are planned for completed construction in 2025. The timeframe for the transition to the new system in western Massachusetts has yet to be finalized. Below is a high-level summary of the project budget and timeline by phase and project milestones based on the project schedule submitted by Motorola Solutions are part of Change Order 004.

FIXED PRICE PROJECT MILESTONES		
DESCRIPTION	COST	SCHEDULED
System Setup	\$ 10,908,106.00	FY22 Q3 – FY26 Q3
Integrations	\$ 2,784,989.00	FY26 Q2 – FY26 Q4
Work Phase 1A	\$ 33,784,960.00	FY23 Q1 – FY26 Q1
Work Phase 1B	\$ 14,689,114.00	FY23 Q4 – FY26 Q4
Work Phase 1C	\$ 7,344,558.00	FY24 Q1 – FY26 Q4
Work Phase 1D	\$ 9,644,113.00	FY24 Q1 – FY26 Q4
TOTAL	\$ 79,155,840.00	

As noted in quarterly and annual reports filed with the DTC, the overall CoMIRS+P25 Modernization Initiative project costs are projected at \$134.8 million dollars; \$9.8 million over the \$125 million initially allocated. The Department's five (5) year projections found in Attachment B include this additional funding to allow for completion of this initiative.

Wireless Center

The Department began operating a Wireless Center after the Department took over responsibility for receiving wireless 911 calls formerly assigned to two wireless state police PSAPs and, as appropriate, relaying emergency 911 calls to public or private safety departments or PSAPs. The Wireless Center operated by Department employees was located at the location that formerly housed the Framingham wireless state police PSAP. The Department worked with the Division of Capital Asset Management and Maintenance (“DCAMM”) to relocate this Wireless Center, which will allow for expansion. The Wireless Center began operations at 31 Maple Street in Milford, Massachusetts on January 22, 2024. In addition, the Department’s training center in Maynard relocated to the 31 Maple Street location effective February 5, 2024.

911 Call Center – North Shore

The Department assumed operational responsibility of a RECC effective Fiscal Year 2020. The transition of the NSRC, formerly known as the Essex County Sheriff RECC, was completed in July 2019. The NSRC receives and processes 911 calls from seven (7) municipalities, with Rowley being added on August 1, 2024. The NSRC expects to begin providing service to an additional community, North Reading, in the fall of 2025.

911 Call Center – Western Massachusetts

In December 2024, the Department assumed operational responsibility of a RECC located in Berkshire County that was previously under the supervision of the Berkshire County Sheriff. This RECC currently receives and processes 911 calls from twenty-six (26) municipalities.

Interpretive Services

Interpretive services, through a third-party vendor, continue to be provided to PSAPs throughout the Commonwealth and for the equipment distribution program (“EDP”) pursuant to a statewide contract with a contractor.

Mobile PSAP

The Department owns, operates, controls, and maintains a mobile PSAP. The mobile PSAP is a vehicle outfitted with six (6) Next Generation 911 answering positions, one (1) administrative workstation, and seven (7) administrative telephones. It is housed in a 2010 Kenworth vehicle. The mobile PSAP is available 24 x 7 to respond to and temporarily replace and assist PSAPs that are rendered non-operational due to structural failure, equipment failure, infrastructure failure, or other emergency and/or pre-planned events. The mobile PSAP is deployed for training, public education, PSAP conversions and build outs, and as an emergency backup PSAP. With the upgrade to Next Generation 911, the mobile PSAP is more capable and easily deployed. The Department has included projected expenses of maintenance and monitoring and overall support for the mobile PSAP.

Programs

Training Program

The legislation requires the Department to train enhanced 911 telecommunicators regarding the receipt and use of enhanced 911 service information. *See G.L. c. 6, § 18B(f).* Since the inception of the training program, the Department has engaged in an effort to offer a comprehensive training program that has expanded through the addition of many new approved courses due to procedural, operational and technology changes like Next Generation 911.

The legislation also directs the Department to establish, with the Commission's approval, certification requirements for enhanced 911 telecommunicators that include EMD and quality assurance of EMD programs.

Accordingly, effective July 1, 2012, the Department promulgated 560 CMR 5.00: State 911 Department Regulations Establishing Certification Requirements for Enhanced 911 Telecommunicators, Governing Emergency Medical Dispatch, and Establishing 911 Call Handling Procedures ("Training regulations"). The Training regulations impose certification requirements in order for a person to act as an enhanced 911 telecommunicator. These regulations require the successful completion of a minimum of two (2) days of 911 equipment and basic telecommunicator training offered by the Department and successful completion of a minimum of forty (40) hours of Department-approved basic telecommunicator training (or the equivalent). In order to maintain certification as an enhanced 911 telecommunicator, it is necessary to successfully complete thereafter a minimum of sixteen (16) hours of Department-approved continuing education annually (or the equivalent). In addition, the Training regulations impose requirements for PSAPs to provide EMD services either through certified emergency medical dispatchers or by arranging for EMD to be provided through a certified EMD resource. The Training regulations require that, in order to act as a certified emergency medical dispatcher for a PSAP, an individual shall: obtain and maintain certification as an enhanced 911 telecommunicator; obtain and maintain cardiopulmonary resuscitation ("CPR") certification (four (4) hour course); and obtain and maintain certification in EMD through an EMD certification organization approved by the Department (at either twenty-four (24) hours or thirty-two (32) hours depending on the vendor). The Training regulations require that, in order to act as a certified EMD resource, the entity shall submit a request for approval that shall include the EMD protocol and documentation that each emergency medical dispatcher is certified.

The training is managed by the PSAPs, and the courses vary. The Department maintains a listing of eligible courses that are supported by the Training Grant program.

In compliance with Chapter 177 of the Acts of 2022, 560 CMR 5.00 was revised to require training dedicated to the identification and response to callers experiencing behavioral health crisis.

Public Education

The legislation provides for the education of consumers regarding the operation, limitation, role and responsible use of enhanced 911 service. The Department continues with its strong commitment to educate

the public regarding enhanced 911 service throughout the Commonwealth. The Department continues to attend outreach events across the Commonwealth, including furnishing literature and information about enhanced 911 service, telecommunications relay service (or “TRS”), specialized customer premises equipment (or “SCPE”), and conducting public service announcements, or PSAs.

Specialized Customer Premises Equipment, Telecommunications Relay Services, Captioned Telephone Relay Service

The legislation transferred to the Department the responsibility for administration and oversight of disability access programs. The legislation directs the Department to provide and maintain a specialized customer premises equipment, distribution service.⁴ The SCPE program, which has been expanded to include wireless phones, makes specialized devices that provide access to telephone networks for people with hearing, speech, vision, mobility or cognitive disability. The legislation also directs the Department to administer telecommunication relay service,⁵ and captioned telephone relay service, or CTRS, throughout the Commonwealth.⁶ The Department has entered into contracts with various equipment vendors to provide the SCPE to persons with disabilities. In addition, the Department has procured the services of a contractor to provide both TRS and CTRS throughout the Commonwealth. This contract expires on August 4, 2027. The Department’s projections maintain funding levels to support these services. In any rate proceeding conducted under chapter 159 in which a common carrier seeks to reflect the costs for such services in rates, the carrier shall submit to the DTC information about such requests for proposals such that the DTC may determine whether the carrier’s proposal would provide such services at a cost to the carrier that reflects the least cost to its ratepayers with due regard for standards of reliability and quality, consistent with the public interest.

On January 29, 2024, the Department issued a RFR for the provision of telecommunications relay services and captioned telephone relay services. The contract for both was awarded to Hamilton Relay in Aurora NE. The current contract runs from 8/4/24 to 8/2/27. There are two 3-year options and one 1-year option that the Department may utilize.

III. FISCAL YEAR 2025 DEVELOPMENT GRANT AMOUNT

The legislation requires that the Development Grant shall provide regional PSAPs and RECCs with funds to support the development and startup of regional and regional secondary PSAPs and regional emergency communication centers. *See G.L. c. 6A, §18B(i)(5).* The Department seeks to maintain funding in the amount of \$50 million for the Fiscal Year 2026 Development Grant.

With respect to the Development Grant, the legislation provides as follows:

The regional and regional secondary PSAP and regional emergency communication center development grant shall support the development and startup of regional and regional secondary PSAPs and regional emergency communication centers, including the expansion or upgrade of existing regional

⁴ The statutory definition of “SCPE” is set forth in G.L. c. 166, § 15E.

⁵ The statutory definition of “telecommunications relay service” or “TRS” is set forth in G.L. c. 166, § 15E.

⁶ The statutory definition of “captioned telephone service” is set forth in G.L. c. 166, § 15E.

and regional secondary PSAPs, to maximize effective emergency 911 and dispatch services as well as regional interoperability. The eligibility for criteria, amount and allocation of funding shall be contained in guidelines established by the department, with commission approval. The grant shall reimburse allowable expenses related to such development and startup, or expansion or upgrade. Any subsequent adjustments that increase the initial funding allocated to this grant by 10 per cent or more shall be approved by the department of telecommunications and cable, upon the petition of the department. The department of telecommunications and cable shall conduct its review and issue a decision within 90 days of the date of the filing of the petition, but the request for approval shall be deemed approved if the department of telecommunications and cable does not issue its decision within 90 days. *See G.L. c. 6A, §18B(i)(5).*

The initial Development Grant allocation amount that was established in Fiscal Year 2009 by the Department, with Commission approval, was \$7.5 million.

Consistent with the legislative intent and the goal of improving public safety and increasing regionalization of government services, the Development Grant is used to establish regional PSAPs and RECCs. Regional PSAPs and RECCs not only create more efficient and effective use of government resources, but also improve public safety for the residents they serve. Combining emergency communication resources through regional PSAPs and RECCs allows for increased staffing, thereby affording 911 telecommunicators the ability to more effectively interact with the public while gathering essential call information and providing potentially life-saving instructions and adequately responding to larger or multiple simultaneous incidents. Regional PSAPs and RECCs allow for increased coordination of a region's limited emergency response resources, including specialized fire, police and EMS vehicles and personnel, and leads to more efficient response to both routine requests for mutual aid and major disasters.

Since the inception of the Development Grant through FY 2025, the Department has allocated a total of \$277,331,497 under this program. Each grant cycle the Department has received requests for funding that total well in excess of the amount allocated to the grant. In Fiscal Year 2025, the Department received grant requests totaling over \$106 million.

Given the past interest shown in the Development Grant, the number of new and multi-year projects, and other regional projects on the horizon, and as a means of providing further incentives to encourage existing regional centers to add to their ranks, the \$50 million for FY 2026 will allow the Department to continue to fund projects as it has in the past several fiscal years. The FY 2026 application period closed on Thursday, March 6, 2025.

The legislation (G.L. 6A, §18B(b)) provides that the Commission "shall review and approve by a majority vote of those members present all formulas, percentages, guidelines or other mechanisms used to distribute the grants described in section 18B, and all major contracts that the [D]epartment proposes to enter into for enhanced 911 service." At its meeting held on December 6, 2024, the Commission unanimously voted to authorize the Department to seek DTC approval of the \$50 million amount.

Accordingly, the Department requests that the DTC approve the Development Grant allocation of \$50 million for Fiscal Year 2026.

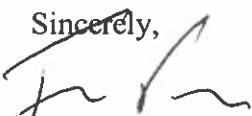
VI. CONCLUSION

All of the expenditures and projected expenditures are prudently incurred expenses designed to fulfill the Department's statutory responsibility to coordinate and effect the implementation of enhanced 911 service, to administer such service in the Commonwealth, and to administer and support the disability access programs in the Commonwealth.

Accordingly, the Department requests DTC Approval of Fiscal Year 2025 Expenditures, as well as Approval of Fiscal Year 2026 Development Grant Amount.

Thank you for your attention to this matter, and please feel free to contact me for further information.

Sincerely,



Frank Pozniak
Executive Director

cc (w/encs.): Kerry Collins, Undersecretary, EOPSS
Sarah K. Monahan, General Counsel, DTC
Mary R. Gardner, Assistant Attorney General, Office of the Attorney General
Adriana Bakhos, Litigation Support Specialist, Office of the Attorney General
Normand Fournier II, Deputy Executive Director, State 911 Department
Dennis Kirwan, General Counsel, State 911 Department
Karen Robitaille, Finance Director, State 911 Department