



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

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VIA ELECTRONIC MAIL AND OVERNIGHT MAIL

March 24, 2025

Ursula Estremera, Secretary
Massachusetts Department of Telecommunications and Cable
One Federal Street
Suite 0740
Boston, MA 02110-2012

RE: Petition of the State 911 Department for Approval of Fiscal Year 2026 Expenditures, and Approval of Fiscal Year 2027 Development Grant Amount.

Dear Ms. Estremera:

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 2026 Expenditures, and Approval of Fiscal Year 2027 Development Grant Amount.

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

I. FISCAL YEAR 2026 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:

¹ Pursuant 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 2026.

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 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 2026 is set forth in Attachment A, along with the final expenditures for Fiscal Year 2025, 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 2026 are \$288,761,348. This projected amount is more than ten (10) per cent greater than the actual expenditures of \$169,888,446 for Fiscal Year 2025. Accordingly, the Department hereby requests DTC approval of Fiscal Year 2026 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 2026 through Fiscal Year 2028. The Department recognizes that this represents a change in past practice from the provision of a five (5) year plan to a three (3) year plan. However, given the significant impact the reduction of the surcharge in FY 2029 will have on its programs, the Department feels it is prudent to delay the provisioning of these budgets until such time that the Department petitions the DTC regarding the surcharge. 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 as of June 30, 2025 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 4.19 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 may be negotiated by the National Association of Government Employees (NAGE) 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 and upgrade of radio equipment and infrastructure at its 911 centers, information technology replacement and upgrade, building repairs at its North Shore Regional 911 Center, and construction and furnishing and equipment costs associated with the establishment of a new training center in Billerica.

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 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,

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

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

equipment, and other allowable expenses. Further, in response to Chapter 177 of the Acts of 2022, the Support Grant, beginning with FY 2024, provides funding to primary PSAPs, regional PSAPs, 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 a funding level for the Wireless State Police PSAP Grant to provide 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.

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.

The Department's projections strive to maintain a funding level for the TERT Grant to assist PSAPs that are stretched beyond their capabilities as the result of an unprecedented event.

Beginning in FY 2027, the TERT Grant is being incorporated into the Training Grant and Support Grant as a means of streamlining processes.

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 for FY 2027 maintain the funding level for the Development Grant at \$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, 2026. There are currently one hundred ninety-four (194) PSAPs in the Commonwealth, with seventy (70) 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 seeing 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 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 for the provision of Next Generation 911 products and services for the successor contract. On August 1, 2024, the Department awarded the five (5)-year contract to NextGen Communications, Inc. (Comtech).

In December 2024, the Department released an RFI to replace the current Next Generation 911 Call processing solution. The current call processing solution is over eight (8) years old and there are new capabilities the Department wants to deploy to further enhance our already capable Next Generation 911 system to better serve the citizens and visitors of the Commonwealth. Those features include Artificial Intelligence (AI), resident portal, central messaging, dispatcher status display, text video and text, and enhanced mapping. Evaluation of proposed solutions requires a multi-tier process. One of which is testing the proposed solutions to see how it integrates with the Next Generation 911 system. Testing is expected to begin in April 2026.

Radio Infrastructure

In 2018, the Department received authorization from the DTC to increase the Enhanced 911 Surcharge for a period of five (5) 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. Governance of the program is joint responsibility of the Department, EOTSS, the Executive Office of Public Safety and Security, and the Department of State Police. 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 19, 2025, the Department reports the following Radio Infrastructure Project activities:

- EOTSS approved the following contract Change Orders with Motorola Solutions. Change Orders are used, in part, to adjust the scope of services included in the fixed price deliverables due from Motorola Solutions.
 - Change Order 005 (CO 005) established a trade-in program to replace 40 sites of GTR base station equipment with newer model D-Series equipment. The newer D-Series equipment will have a longer support timeframe and will more easily support adding capacity to the new digital system. CO 005 totals \$2,377,587.00. Included in this Change Order are 7500 additional licenses for the Radio Management tool to support the subscriber upgrade program and transition planning for CoMIRS users. This Change Order was funded by the existing Project Allowance Budget. There was no change to overall project cost or timeframe from this Change Order.
 - Change Order 006 (CO 006) divides the remaining balance on contract milestone 8-4 System Installation (Phase 1A) into two equal pieces totaling \$1,900,404 each. There was no change to overall project cost or timeframe from this Change Order.
 - The CoMIRS PMO is working with Motorola Solutions on Change Orders 007 and 008 to document agreed upon changes in scope to sites in Phases 1B, 1C, and 1D and the backhaul network.

- 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 021 Kohler Portable Generator, approved for payment on March 08, 2025, in the amount of \$119,944.21
 - Task Order 025 Mt Grace Tower Remediation, approved for payment on March 08, 2025, in the amount of \$193,030.49
 - Task Order 024 Ragged Hill Transition Improvements, approved for payment on March 10, 2025, in the amount of \$170,448.51
 - Task Order 019 Tower Remediations for Chester, Savoy, and Sunderland Sites, approved for payment on March 19, 2025, in the amount of \$319,056.35
 - Task Order 032 Wilbraham Geotechnical Analysis and Foundation Mapping, approved for payment on March 20, 2025, in the amount of \$14,573.00
 - Task Order 034 Framingham GHQ UPS Replacement, approved for payment on March 20, 2025, in the amount of \$300,692.00

- o Task Order 015 Tower Remediation for Lenox and Ragged Sites, approved for payment on September 12, 2025, in the amount of \$278,443.16
 - o Task Order 044 D-Series Equipment Trade in Program (for 40 sites in central and eastern Massachusetts), approved for payment on November 13, 2025, in the amount of \$2,377,587.00
 - o Task Order 045 Sunderland Mt Toby Access Improvements, approved for payment on December 05, 2025, in the amount of \$397,016.83
 - o Task Order 041 Misc Phase 1A Tower and Site Items, approved for payment on December 15, 2025, in the amount of \$202,326.10
 - o Task Order 010 Phase 1A SOW Site Improvements (as amended), approved for payment on December 27, 2025, in the amount of \$553,387.67
 - o These 11 Task Order payments total \$4,926,505.32. These Task Orders are tracked across the following Project Allowance Budget categories:
 - Site Improvements (\$1,711,835.72)
 - Tower Remediation (\$837,082.60)
 - Additional Equipment (\$2,377,587.00)
 - o Through February 2026, \$6,544,032.21 (35.4%) remains unencumbered in the Project Allowances Budget. Several Change Orders and Task Orders are expected in 2026 that are proposed to be charged to Project Allowances.
- The CoMIRS+P25 Project activities during calendar year 2025 focused on construction or modification of communications sites and the installation of antenna systems, microwave dishes, fiber circuits, security systems, communications shelters, backup power systems and related equipment.
 - o 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, and other construction prerequisites.
 - o During calendar year 2025, the CoMIRS Modernization Project completed 35 statements of work, 27 lease amendments, 15 new leases, and issued 23 new notices to proceed to construction.
 - o Many Phase 1B, 1C, and 1D sites have moved to the permitting and construction phase of the project. As of February 2026, there are 100 communications sites planned for the new system. 20 sites are in engineering and leasing. 9 sites are in building permitting. 28 sites are in construction. 33 sites are completed or pending customer acceptance. 10 sites do not require extensive civil construction work.
- The CoMIRS PMO tracks major project metrics across 56 categories of project activities. The following are completed activities reported by the prime implementation contractor in 2025 and totals to date through January 2026:
 - o 3 Site Walks completed in 2025 (108 total)
 - o 3 Lease Exhibits completed in 2025 (87 total)
 - o 35 Statements of Work completed in 2025 (85 total)
 - o 27 Lease Amendments completed in 2025 (56 total)
 - o 15 New Leases signed in 2025 (17 total)
 - o 3 Tower Mappings completed in 2025 (44 total)
 - o 3 Foundation Mappings completed in 2025 (23 total)
 - o 4 Geotechnical Analyses completed in 2025 (21 total)
 - o 30 Structural Analyses completed in 2025 (78 total)

- 6 Tower Remediation Designs completed in 2025 (13 total)
 - 16 Mount Analyses completed in 2025 (18 total)
 - 3 Custom Mount Designs completed in 2025 (8 total)
 - 2 Foundation Designs completed in 2025 (4 total)
 - 17 NEPA Reviews completed in 2025 (81 total)
 - 3 FAA Screenings completed in 2025 (86 total)
 - 4 FAA Filings completed in 2025 (8 total)
 - 1 Site Surveys completed in 2025 (2 total)
 - 27 100% Signed and Sealed Construction Drawings completed in 2025 (70 total)
 - 20 Building Permits pulled in 2025 (59 total)
 - 23 Notices to Proceed for Construction issued in 2025 (61 total)
 - 15 Construction Starts initiated in 2025 (50 total)
 - 3 Clearings completed in 2025 (6 total)
 - 6 Generator Foundations completed in 2025 (10 total)
 - 3 Fuel Tank Foundations completed in 2025 (4 total)
 - 7 Underground Utilities completed in 2025 (15 total)
 - 8 Underground Grounding completed in 2025 (31 total)
 - 6 New Shelters set in 2025 (9 total)
 - 5 New Generators set in 2025 (8 total)
 - 2 New Fuel Tanks set in 2025 (5 total)
 - 1 Fuel Tank Utility Connections completed in 2025 (3 total)
 - 1 Above Grade Electrical completed in 2025 (2 total)
 - 2 Above Grade Grounding completed in 2025 (5 total)
 - 3 Ice Bridges installed in 2025 (7 total)
 - 3 Compound Final Grade completed in 2025 (5 total)
 - 1 Fence Upgrades completed in 2025 (2 total)
 - 2 Gates installed in 2025 (7 total)
 - 14 Antenna and Line Installations completed in 2025 (38 total)
 - 13 Line Sweeps completed in 2025 (37 total)
 - 9 Site Restorations completed in 2025 (35 total)
 - 5 Punch Lists completed in 2025 (28 total)
 - 3 HVAC Replacements installed in 2025 (15 total)
 - 11 Civil Acceptance Test Inspections completed in 2025 (29 total)
 - 21 Fixed Network Equipment Deliveries completed in 2025 (34 total)
 - 21 Base Stations installed in 2025 (33 total)
 - 2 DC Plants installed in 2025 (6 total)
 - 18 Microwave Installations completed in 2025 (26 total)
 - 7 Microwave Acceptance Test Inspections completed in 2025 (7 total)
 - 6 Equipment Re-rackings completed in 2025 (7 total)
 - 11 Video Surveillance Systems completed in 2025 (45 total)
 - 10 Access Control Systems completed in 2025 (45 total)
- 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 has negotiated a program with Motorola Solutions to allow licenses (features) to be added to existing radios, including many radios that are no longer supported by Motorola Solutions. This program will allow thousands of existing radios to properly operate on the new system. Radios previously approved for upgrade under the CoMIRS Radio Upgrade Grant Program (RUP) will be upgraded by the CoMIRS project. Other radios may be upgraded at the owner agency's expense.
 - Through the end of January 2026, 5,496 radios have been evaluated by the CoMIRS PMO and Motorola Solutions to determine compliance with required features for the CoMIRS+P25 system. 4,262 radios require at least one feature to work on the new system. 2,086 of these radios will be paid for by the RUP program. 2,016 radios are agency-paid.
 - This program is only available through the end of March 2026.
- The CoMIRS PMO and the Department of Conservation and Recreation continue to coordinate on the planning, construction, and installation activities involving sites located on DCR properties. Key among these joint planning efforts is the proposed consolidation of communications systems in a new shared equipment shelter on Mt Wachusett in Princeton and the replacement of the existing tower used for microwave and radio communications in Chelmsford.
- After outreach efforts in 2024 and 2025, the CoMIRS PMO was unable to reach agreement with the managers of the new City of Boston P25 system to fully integrate the two systems. Instead, the CoMIRS PMO is pursuing the option of building out robust and native coverage as part of the CoMIRS+P25 system throughout the Boston metropolitan area. Additional communication sites and inter-system agreements are being pursued to enhance coverage throughout the region.
- The first components of the CoMIRS+P25 system went live on November 3, 2025. As of November, the CoMIRS+P25 Primary Core and DSR Core are in production support and covered by interim warranty. The CoMIRS+P25 Cores are currently supporting the new P25 radio sites installed by the Massachusetts Department of Correction.
- The radio sites supporting western Massachusetts are planned to be ready for production use in later half of calendar year 2026. The radios sites in central and eastern Massachusetts are scheduled to be ready for production use in calendar year 2027. Some project activities, including console upgrades, are currently forecast to be completed in 2028.
 - The timeframe for the transition to the new system in western Massachusetts has yet to be finalized and will be contingent on the readying of scores of public safety agencies and thousands of radios for the new system.
 - In accordance with DTC Final Order 25-2, the Interdepartmental Services Agreement (ISA) between the State 911 and the Executive Office of Technology Services and Security to fund the CoMIRS Modernization Project has been extended to include services in FY2027.
 - The budget submitted in this petition includes a request to extend funding for the CoMIRS Modernization Project into FY2028. Funding requests in FY2028 include completion of contract milestones by Motorola Solutions, the expenditure of Allowance Funds to support the completion of IS-1 installation, program management, engineering and independent verification and validation services, and indirect cost payments.

- Total funding requested for the CoMIRS Modernization Project by the DTC and the Enhanced 911 Trust Fund has increased from \$134.8 million dollars noted in the Department’s 2025 petition to a total of \$146,682,758 in this petition. This represents an increase of \$11,898,967 from the funding levels approved in DTC Final Order 25-2. Cost estimates for much of this requested funding increase were received by the CoMIRS Program Management Office in February of 2026. Details of this requested change in budget include the following using the FY2025 Annual Report as the baseline:
 - An increase in line item U07 “IT Equipment Purchase (Network)” from \$98,543,090 to \$107,757,961. This represents a \$9,214,872 increase in the Project Allowance Budget. The increase is intended to fund these project costs:
 - Additional costs to access remote communications sites and to address unforeseen construction costs (including remediating the shared-use MEMA tower on Mt Wachusett, safely bridging multiple culverts along the access road to Mt Toby to permit heavy vehicles to reach the shared-use communication tower at the summit for needed repairs and equipment installation, and numerous other expenses listed in the proposed Task Order 046, received in February 2026);
 - Additional costs of equipment and services to complete the construction and installation of the Phase 1B+ communications sites (including those proposed in Change Order 007 for 17 Phase 1B+ sites and estimates for the completion of the remaining Phase 1B+ sites). Several decisions in site selection dictated by tree overgrowth, microwave path viability, tower loading and condition, and coverage enhancement led the project to shift proposed radio site locations from traditional fire and other existing towers to commercial sites. These decisions saved money overall on costly and complicated tower remediations, but added new, one-time costs for shelters and other new site equipment. Those one-time costs are included among the additional costs requested in Change Order 007, received in February 2026;
 - Increased costs of implementing the microwave backhaul network throughout central and eastern Massachusetts (including costs expected to be submitted in Change Order 008). The changes to site selection in eastern Massachusetts, and the addition of three sites in the Boston metropolitan area, resulted in corresponding changes to the backhaul network. Motorola Solutions has estimated that an additional \$4.9M may be needed to complete the microwave backhaul network for the new system;
 - Additional funding of \$1,000,000 to address unforeseen construction costs (including costs such as rock excavation, in-field repairs, custom designs, unique installations, and additional site preparation activities); and
 - Additional costs (yet to be agreed upon) for the extension of Motorola Solutions project resources throughout FY2027, additional costs to warehouse project equipment, and additional costs associated with the extension of interim warranty (as proposed by Motorola Solutions in Change Order 007, also received in February 2026);

As of the time of petition submission, negotiations are on-going with Motorola Solutions concerning several of these additional expenses.

- The budget proposed in this petition reconciles a difference in funding level as noted above. The “State 911 Department Budget Projects: FY2025-FY2029” in the DTC 25-2 Petition for line “Radio Infrastructure Project” totaled \$76,093,557 across those five fiscal years. The FY2025 Annual Report totaled \$78,127,652 across those same five fiscal years. The difference of \$2,034,095 is largely a product of the interim funding of project site leases

for radio site construction and system installation up to the point these new lease expenditures can be budgeted in full and paid for as part of an annual appropriation for operational expenses. These sites are project sites in permitting or construction and are not yet operational. The Department of State Police and the Executive Office of Public Safety and Security have committed to funding these recurring costs on an ongoing basis as each becomes operational.

- o Additional funding for project line items U05 and U11 for project management and independent engineering and IV&V services (totaling an increase of \$625,000) and E16 for indirect costs (totaling an increase of \$25,000) in FY2028.
- o To partially offset increased project costs, the CoMIRS Program Management Office has undertaken a number of cost-saving or burden-sharing activities. These include:
 - The CoMIRS PMO negotiated a program with Motorola Solutions to reopen licensing for out-of-support radios currently in operation on the existing CoMIRS radio network but lack all the licenses needed for the new system. Without this unique program, agencies would have to purchase replacement radios, instead of adding missing licenses. Many radios were missing a single license needed for the new system (list price \$136.00 per radio). Replacement radios can cost \$5000 or more;
 - The CoMIRS PMO negotiated program discounts of 35% off list price for licenses added to existing CoMIRS radios. Five (5) orders have been placed with Motorola Solutions for CoMIRS-funded radio license upgrades. These five (5) orders included licenses for 3,230 radios, totaling \$3,534,031.50 (list price) or \$2,297,120.49 (with program discount). This represents a savings of \$1,236,911.01;
 - The CoMIRS PMO continued to assign costs of upgrading radios not specifically delineated in a CoMIRS Radio Upgrade Program award to each agency as an agency financial responsibility. As of March 18, 2026, agency-paid radio upgrade expenses have been assigned to 91 agencies for 2,626 radios totaling \$533,858.00 (inclusive of program discount);
 - In several instances, funds originally approved for expenditure from the Project Allowance Budget were determined as no longer needed. These funds, totaling \$404,508.40 were subsequently canceled and returned to Project Allowance Budget;
 - The CoMIRS Program Management Office continues to operate at a lower resource level than originally planned. Project savings are included in budget lines U05 IT Staff Augmentation and U11 IT Contract Services;
 - The Executive Office of Technology Services and Security continues to provide contract, fiscal, and administrative support for the project without compensation or chargeback;
 - The Executive Office of Public Safety and Security and the Department of State Police continue to dedicate full-time resources to the CoMIRS Modernization Project without compensation or chargeback. Additionally, many costs that benefit both the current and future statewide radios systems are paid by EOPSS and/or MSP, including existing leases, circuits, utilities, maintenance, and other costs;
 - The CoMIRS PMO and the CoMIRS Planning Oversight Committee have made several decisions to reduce scope or alter planned implementations to save money or achieve a better long-term financial outcome for the program. An example includes the decision to shift site acquisition for an important communications site in the Framingham region from an existing site to a managed commercial site.

The costs of continuing to use this existing site would have been \$1-2M. Significant savings were achieved by moving to an alternate commercial site. The Department of State Police has agreed to assume the added monthly lease cost for this new commercial site once the site is operational;

- The nature of the contract language and pricing in the 2021 Motorola Solutions contract for the implementation of the CoMIRS+P25 IS-1 system has protected the project budget, to a large degree, from the cost increases driven by inflation over the past several years. The annual inflation rate based on the Consumer Price Index (CPI) increased 4.7% in 2021, 8.0% in 2022, 4.1% in 2023, 2.9% in 2024, and 2.6% in 2025. Many of the costs for the CoMIRS Modernization Project were locked in at 2021 rates. Using CPI as a cost inflator, a \$1,000,000 project in 2021 would cost \$1,242,750 by the end of 2025 (representing a 24.3% total increase); and
- Discussions are ongoing for the use of supplemental, agency-contributions to fund additional likely investments in the radio network, including capacity expansion and coverage enhancements.

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 North Shore Regional 911 Center (“NSRC”), formerly known as the Essex County Sheriff RECC, was completed in July 2019. The NSRC receives and processes 9-1-1 calls from nine (9) municipalities, with Groveland, North Reading, and Rowley being added since the filing of the last Petition in 2025. The NSRC expects to begin providing service to Hamilton in April, 2026, and to Boxford in May 2026. In addition, the NSRC receives and processes wireless 911 calls for that region of the Commonwealth.

911 Call Center – Western Massachusetts

In December 2024, at the request of Berkshire County Sheriff Thomas Bowler, Governor Healy passed legislation that transferred the operation of the center to the Department. This transfer allows the Sheriff’s Department to concentrate on its core mission and allows for expanded opportunities for the RECC, member communities, and emergency telecommunicators. The

Department installed a permanent Director of PSAP Operations Division - West, which incorporates Berkshire RECC. This RECC currently receives and processes 911 calls from twenty-six (26) municipalities. The current location of the Berkshire RECC is in a building owned and operated by the Berkshire County Sheriff in Pittsfield. The Department is in the beginning stage of finding a new location for the RECC in the Pittsfield area.

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 (“EMD regulations”). The EMD 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 EMD 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 EMD 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 CPR certification; and obtain and maintain certification in EMD through an EMD certification organization approved by the Department. The EMD 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 EMD regulations require that all certified enhanced 911 telecommunicators complete sixteen (16) hours of continuing education annually. Further, the EMD regulations require newly hired enhanced 911 telecommunicators 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 EMD (at either twenty-four (24) hours or thirty-two (32) hours depending on the vendor) if providing EMD in-house and a four (4) hour cardiopulmonary resuscitation (CPR) course. 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 has been modified to require two (2) hours of 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. In FY 2027 the Department will be conducting a targeted campaign to educate the Commonwealth’s aging adults on the available features and functions of 911.

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

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

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. The Department's projections maintain funding levels to support these services.

III. FISCAL YEAR 2027 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 at \$50 million for the Fiscal Year 2027 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 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

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 is set forth in G.L. c. 166, § 15E.

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 2026, the Department has allocated a total of \$327,331,497 under this program. Each grant cycle the Department has received requests for funding that totals well in excess of the amount allocated to the grant. In Fiscal Year 2026, the Department received grant requests totaling over \$134 million dollars.

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 2027 will allow the Department to continue to fund projects more as it has in the past several fiscal years. The FY 2027 application period will close on April 15, 2026.

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 March 4, 2026, 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 2027.

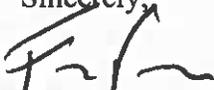
IV. CONCLUSION

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 its Fiscal Year 2026 Expenditures, as well as Approval of Fiscal Year 2027 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
Normand Fournier II, Deputy Executive Director, State 911 Department
Dennis Kirwan, General Counsel, State 911 Department
Karen Robitaille, Finance Director, State 911 Department