The Commonwealth of Massachusetts
EXECUTIVE OFFICE OF PUBLIC SAFETY AND SECURITY
STATE 911 DEPARTMENT
1380 Bay Street, Building C ~ Taunton, MA 02780-1088
Tel: 508-828-2911 ~ TTY: 508-828-4572 ~ Fax: 508-828-2585
www.mass.gov/e911

EMERGENCY 911 Police • Fire • EMS

DEVAL L. PATRICK
Governor

ANDREA CABRAL
Secretary of Public Safety and Security

FRANK POZNIAK
Executive Director

VIA ELECTRONIC MAIL AND OVERNIGHT MAIL

RECEIVED
MAY 17 2018
MASS. DEPT OF TELECOMMUNICATIONS & CABLE

September 11, 2014

Catrice C. Williams
Secretary and Paralegal Specialist
Massachusetts Department of Telecommunications and Cable
1000 Washington Street, Suite 820
Boston, Massachusetts 02118-6500

RE: Petition of the State 911 Department to Adjust the Enhanced 911 Surcharge

Dear Ms. Williams:

Pursuant to Massachusetts General Laws ("G.L.") c. 6A, §18H(b), the State 911 Department hereby submits this Petition of the State 911 Department for Adjustment of the Enhanced 911 Surcharge.

I. ENHANCED 911 SURCHARGE ADJUSTMENT

The State 911 Department ("Department") hereby petitions the Department of Telecommunications and Cable ("DTC") to adjust the Enhanced 911 Surcharge to $1.25, effective as soon as possible, for each subscriber or end user whose communication services are capable of accessing and utilizing the enhanced 911 system, for expenses associated with 911 services.

As set forth more fully below, the adjustment to the Enhanced 911 Surcharge ("surcharge") is necessary in order for the Department to meet its statutory obligations and to continue to fulfill its responsibility to coordinate and effect the implementation of enhanced 911 service, to administer such service in the Commonwealth, and to administer and support the Department's programs, including disability access programs, in the Commonwealth.

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

[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

Catrice C. Williams
Massachusetts Department of Telecommunications and Cable
1000 Washington Street, Suite 820
Boston, Massachusetts 02118-6500

II. BACKGROUND AND OVERVIEW

Statutory Scheme

Chapter 223 of the Acts of 2008 ("the legislation") established the Department and requires that the Department coordinate and effect the implementation of enhanced 911 service and administer such service in the Commonwealth. *See* G.L. c. 6A, § 18B(d).

The stated purpose of the legislation is to further protect the public's safety by improving the Commonwealth's ability to coordinate and administer the enhanced 911 system and to ensure the most efficient and consistent approach for enhanced 911 service to all cities and towns throughout the Commonwealth.

The legislation also directs the Department to review and assess new communications technologies that may include, but are not limited to, wireless, video, broadband, and IP-enabled applications that may serve as the next generation 911 technology platforms, consistent with Federal Communications Commission decisions and federal law. *See* G.L. c. 6A, § 18B(h).[2]

In addition to directing the Department to administer the enhanced 911 system, the legislation directs the Department to develop, administer, and fund grant programs to assist PSAPs and RECCs in providing enhanced 911 service and to foster the development of regional PSAPs, regional secondary PSAPs, and RECCs[3]. The legislation also directs the Department to provide and maintain disability access programs and to provide public education services.

---

the enhanced 911 system. The Department respectfully requests that the DTC treat this petition as satisfying that requirement for Fiscal Years 2013, 2014, and 2015. The actual expenditures for Fiscal Year 2013 and 2014 and the projected expenditures for Fiscal Year 2015 are set forth on Exhibit A attached hereto and made a part hereof.

[2]The statutory definition of "Next generation 911" is "an enhanced 911 system that incorporates the handling of all 911 calls and messages, including those using IP-enabled services or other advanced communications technologies in the infrastructure of the 911 system itself." The statutory definition of "IP-enabled service" is "a service, device or application which makes use of Internet Protocol, or IP, and capable of entering the digits 911, or by other means as approved by the department, for the purposes of interconnecting users to the enhanced 911 system including, but not limited to, voice over IP and other services, devices, or applications provided through or using wireline, cable, wireless, or satellite facilities or any other facility that may be provided in the future." *See* G.L. c. 6A, § 18A.

[3]The statutory definitions of "public safety answering point," or "PSAP," "regional emergency communication center," or "RECC," "regional PSAP," "regional secondary PSAP," and "wireless state police PSAP" are set forth in G.L. c. 6A, § 18A.

Catrice C. Williams
Massachusetts Department of Telecommunications and Cable
1000 Washington Street, Suite 820
Boston, Massachusetts 02118-6500

Current Enhanced 911 Surcharge

The legislation replaced the prior scheme of separate wireline and wireless enhanced 911 surcharges to create a single surcharge and fund with the surcharge to be assessed on wireline, wireless, and other users. The legislation sets the single surcharge at seventy-five (75) cents per month. The legislation provides, in pertinent part, as follows:

> There shall be imposed on each subscriber or end user whose communication services are capable of accessing and utilizing an enhanced 911 system, a surcharge in the amount of 75 cents per month for expenses associated with services provided under sections 18A to 18J, inclusive, and sections 14A and 15E of chapter 166. *See* G.L. c. 6A, §18H (a).

The legislation sets forth the manner in which the surcharge shall be imposed, by type of service, as follows:

> . . . For wireline enhanced 911 service, the charge shall be imposed on each voice grade exchange telephone line of business and residence customers within the commonwealth . . . For wireless enhanced 911 service, the charge shall be imposed per wireless mobile telephone number, based on the area code chosen by the subscriber or end user . . . For interconnected VoIP provider service, the charge shall be imposed on each voice grade telephone line of business and residence customers within the commonwealth. For IP-enabled service, the charge shall be imposed based on the subscriber's or end user's billing address in the commonwealth except for interconnected VoIP provider service, unless a different method is approved by the department. For prepaid wireless service, the department shall promulgate regulations establishing an equitable and reasonable method for the remittance and collection of the surcharge or surcharge amounts for such service. For all other services not identified above, the surcharge shall be imposed based on the subscriber's billing address in the commonwealth, unless a different method is approved by the department. *See* G.L. c. 6A, §18H (a).

The legislation provides that the surcharge shall be collected by the communication service provider and shall be shown on the subscriber's or end user's bill as "Disability Access/Enhanced 911 Service Surcharge," or an appropriate abbreviation. The subscriber or end user is liable for the surcharge, and the communication service provider

is not financially liable for surcharges billed on behalf of the Commonwealth but not collected from subscribers or end users. *See* G.L. c. 6A, §18H (a).

Accordingly, in accordance with G.L. c. 6A, §18H(b), there is, and has been since July 31, 2008, imposed on each subscriber or end user whose communication services are capable of accessing and utilizing an enhanced 911 system, a surcharge in the amount of seventy-five (75) cents per month for expenses associated with services provided under G.L. c. 6A, §§ 18A to 18J, inclusive, and §§ 14A and 15E of c. 166.

As noted above, the legislation provides that, for prepaid wireless telephone service, the Department shall promulgate regulations establishing an equitable and reasonable method for the remittance and collection of the surcharge or surcharge amounts. Effective July 1, 2009, the Department promulgated 560 CMR 3:00: Regulations Establishing an Equitable and Reasonable Method for the Remittance and Collection of a Surcharge on Prepaid Wireless Telephone Service ("prepaid regulations"). The prepaid regulations provide that, on or after July 1, 2009, there shall be a surcharge in the amount of seventy-five (75) cents per month imposed on each subscriber, end user, or customer whose communication services are capable of accessing and utilizing enhanced 911 service. The prepaid regulations provide two (2) options for the collection of the surcharge. The prepaid regulations permit the service provider to: 1) collect the surcharge on a monthly basis from each subscriber, end user, or customer; or 2) calculate and remit the monthly surcharge by use of a revenue formula. The numerator for the revenue formula is the total Massachusetts revenue for prepaid wireless telephone service for the month. The denominator for the formula is the service provider's national average revenue per user ("ARPU") for prepaid wireless telephone service, multiplied by seventy-five (75) cents.

The Department is required to seek the approval of the DTC for an adjustment in the surcharge. G.L. chapter 6A, § 18H(b) provides, in pertinent part, as follows:

> . . . The department may petition the department of telecommunications and cable for an adjustment in the surcharge established in subsection (a). The department of telecommunications and cable shall be responsible for establishing the new surcharge, and all future surcharges, upon 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 commencement of the investigation, but the surcharge shall be deemed approved if the department of telecommunications and cable does not issue its decision within such 90 days.

Catrice C. Williams
Massachusetts Department of Telecommunications and Cable
1000 Washington Street, Suite 820
Boston, Massachusetts 02118-6500

III. 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 2015 through Fiscal Year 2019. The Department's projected revenues and expenditures for Fiscal Year 2015 through Fiscal Year 2019 are itemized in Exhibit B attached hereto and made a part hereof.[4]

[4]Pursuant to G.L. c. 6A, § 18H(c), the Department must seek approval of the DTC for projected expenditures that exceed total expenditures of the previous fiscal year by ten (10) per cent or more. As set forth in the projected revenues and expenditures filed herewith in Exhibit A, the projected expenditures of the Department for Fiscal Year 2015 are more than ten (10) per cent greater than the actual expenditures of Fiscal Year 2014. Accordingly, the Department requests DTC approval of Fiscal Year 2015 expenditures.

Catrice C. Williams
Massachusetts Department of Telecommunications and Cable
1000 Washington Street, Suite 820
Boston, Massachusetts 02118-6500

Projected Surcharge Revenues

The revenue projection methodology is consistent with the Department's past revenue projection methods. The subscriber line counts are based on the average number of subscribers and assume 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 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 estimated number of subscribers and subtracting carrier administrative fees and projected uncollected revenue. The projection assumes a one (1) per cent carrier administrative fee and a two (2) per cent uncollectible revenue rate.

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 0.19 per cent as an estimate of the interest rate to be applied, on a monthly basis, to the 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.

Catrice C. Williams
Massachusetts Department of Telecommunications and Cable
1000 Washington Street, Suite 820
Boston, Massachusetts 02118-6500

Administration

Salary Costs

The Department's projected expenses include salaries and overhead costs for employees and contract employees. The Department has projected salary expenses that reflect contractual step increases and cost of living adjustments negotiated by the National Association of Government Employees union and the Commonwealth, and increased staffing levels to support Department projects and programs.

Agency Expenses

The category of agency expenses includes employee reimbursements, administrative expenses, operational supplies, utilities/space rental, consultant services, operational services, equipment purchases, vehicle lease, maintenance and repair services, building maintenance and repairs, and IT services and equipment. With respect to building maintenance and repairs, pursuant to an inter-departmental license with the Division of Capital Asset Management and Maintenance ("DCAMM") to occupy state-owned property, the Department was responsible for the maintenance and repair of three buildings, namely Buildings B, C, and D, at its offices in Taunton, Massachusetts. Building B houses the Department's Programs Division, the Massachusetts Equipment Distribution Program ("EDP"), and a cache of inventory of specialized customer premises equipment that the EDP distributes to persons with disabilities. Building B also contains a training facility that is equipped with PSAP CPE, which can become a live PSAP in an emergency situation. The Department's administration, including the Systems and Fiscal Divisions, are located in Building C. Building D is used by the Department for cold storage of Department records and surplus equipment. The license with DCAMM was effective through January 10, 2012.

On or about January 11, 2012, DCAMM conveyed the state property to a joint venture consisting of the Mass Development Finance Agency and the Taunton Development Corporation ("Joint Venture"). On or about the same date, the Department entered into a three year (3) lease with the Joint Venture to retain the right to use Buildings B, C, and D. Under the terms of the lease, the Department will pay the Joint Venture $1.00 for rent in year one (1) of the occupancy, and $107,362 per year for the following two (2) years of occupancy. In addition, the Department will remain responsible for the security, maintenance, and repair of the facilities and will pay for certain operating expenses.

In 2013, the Department began working with DCAMM to find a new office location for the Department. The projected space rental costs for Fiscal Year 2015 through Fiscal Year 2019 are reflected in the Department's projections.

Capital Projects

The Department's projections include relocation and renovation costs associated with the Department's new office location.

Programs

As described more fully below, the Department's programs consist of the Training Program, Public Education, the Grant Programs, and the Wireless Center.

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, some of which are taught by outside vendors. The amount allocated to training for Fiscal Year 2015 through Fiscal Year 2019 reflects this expanded training program and the Department's continued commitment to ensuring that enhanced 911 telecommunicators throughout the Commonwealth are trained and certified.

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

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 educating the public regarding enhanced 911 service throughout the Commonwealth. The Department continues to conduct successful kids and senior citizens campaigns, and will continue to distribute 911 kits to these groups. In addition, the Department will continue to attend outreach events across the Commonwealth, including furnishing literature and information about enhanced 911 service, telecommunication relay service, or TRS,[5] and EDP, and conducting public service announcements, or PSAs. The Department's projections maintain the current funding levels for these services for Fiscal Year 2015 through Fiscal Year 2019.

Grant Programs

The legislation requires the Department to develop and administer grant programs to assist PSAPs and RECCs 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.[6]

The legislation provides that the State 911 Commission shall approve all formulas, percentages, guidelines, or other mechanisms used to distribute these grants. *See* G.L. c.

[5] The statutory definition of "telecommunications relay service" or "TRS" is set forth in G.L. c. 155, § 15E.
[6] The EMD Grant was approved by the DTC by Order dated May 27, 2011 in D.T.C. 11-2. The EMD Grant was renamed the EMD/Regulatory Compliance Grant in Fiscal Year 2014.

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 State 911 Commission.

Training and EMD/Regulatory Compliance Grant

The Public Safety Answering Point and Regional Emergency Communication Center Training and EMD/Regulatory Compliance Grant ("Training and EMD/Regulatory Compliance 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 EMD/Regulatory Compliance Grant provides funding, not provided under the Training Grant, for EMD services provided through a certified EMD resource and provides supplemental funding for expenses needed to meet the minimum training and certification requirements and minimum EMD requirements established by the Department.[7] The legislation provides that five (5) per cent of the total surcharge revenues of the previous fiscal year shall be allocated to the Training Grant, unless the percentage is increased by the approval of the State 911 Commission. The legislation provides that any such increase to a level of seven point five (7.5) per cent or more shall also be approved by the DTC.

The Department's projections maintain the funding level for the Training Grant for Fiscal Year 2015 through Fiscal Year 2019 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.

The Department's projections maintain the funding level for the EMD/Regulatory Compliance Grant for Fiscal Year 2105 through Fiscal Year 2019 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 legislation provides that twenty-five (25) per cent of the total surcharge revenues of the previous fiscal year shall be allocated to the Support Grant, unless the percentage is increased by the approval of the State 911 Commission. The legislation

[7] The statutory definition of "emergency medical dispatch," or EMD, is set forth in G.L. c. 6A, § 18A.

provides that any such increase to a level of thirty-one point twenty-five (31.25) per cent or more shall also be approved by the DTC.

Support Grant

The Department's projections maintain the funding level for the Support Grant for Fiscal Year 2015 through Fiscal Year 2019 to provide sufficient funding for primary PSAPs, regional PSAPs, regional secondary PSAPs, and RECCs for personnel, equipment, and other allowable expenses.

Incentive Grant

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 legislation sets forth the following incentive funding categories: (i) for regional PSAPs serving two (2) municipalities, one half (½) of one (1) per cent of the total surcharge revenues of the previous fiscal year; (ii) for regional PSAPs serving three (3) to nine (9) municipalities, one (1) per cent of the total surcharge revenues of the previous fiscal year; (iii) for regional PSAPs serving ten (10) or more municipalities, one and one half (1½) per cent of the total surcharge revenues of the previous fiscal year; and (iv) for RECCs, two (2) per cent of the total surcharge revenues of the previous fiscal year. These percentages may be adjusted by the State 911 Commission to ensure a proper allocation of incentive funds as more regional PSAPs and RECCs are added, but any such adjustments that increase the initial total allocation of the incentive grant by ten (10) per cent or more shall be approved by the DTC. *See* G.L. c. 6A, § 18B(i)(4).

The Department's projections maintain the funding levels for the Incentive Grant for Fiscal Year 2015 through Fiscal Year 2019 at one half (½) of one (1) per cent of the total surcharge revenues of the previous fiscal year for regional PSAPs serving two (2) municipalities; (ii) one (1) per cent of the total surcharge revenues of the previous fiscal year for regional PSAPs serving three (3) to nine (9) municipalities; (iii) one and one half (1½) per cent of the total surcharge revenues of the previous fiscal year for regional PSAPs serving ten (10) or more municipalities; and (iv) four (4) per cent of the total surcharge revenues of the previous fiscal year for RECCs.[8] The Department believes that

[8]The increase in the RECC category amount from two (2) to four (4) per cent was approved by the DTC by Order dated May 27, 2011.

funding will 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, the majority of 911 calls placed from wireless callers in the Commonwealth are routed to three (3) wireless state police PSAPs for directly dispatching emergency response services or transferring the calls to local PSAPs for local police, fire, and emergency medical services dispatch, or in some instances not transferred at all.

The Wireless State Police PSAP Grant reimburses wireless state police PSAPs for allowable expenses related to training, enhanced 911 personnel, and equipment costs. The statute provides that four (4) per cent of the total surcharge revenues of the previous fiscal year shall be allocated to this grant, unless the percentage is increase by the approval of the State 911 Commission. Any such increase to a level of six (6) per cent or more shall also be approved by the DTC. The Department's projections maintain the funding level for the Wireless State Police PSAP Grant for Fiscal Year 2015 through Fiscal Year 2019 to provide sufficient funding for allowable expenses.

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 construction and equipment for proposed regional PSAPs and RECC; feasibility studies, construction, and equipment for new proposed regional PSAPs and RECCs; and construction to expand and new equipment for proposed regional PSAPs and RECCs. The Department's projections maintain the funding level for the Development Grant for Fiscal Year 2015 through Fiscal Year 2019 at $8 million to provide sufficient funding for these important regionalization efforts.

Wireless Center

In addition, the Department's projections include funding for a Wireless Center, a dedicated center within the same facility as the Essex County RECC, for the purpose of

receiving wireless 911 calls assigned to it by the Department and, as appropriate, relaying emergency 911 calls to public or private safety departments or PSAPs. The Wireless Center has been assigned the responsibility of receiving all wireless 911 calls from ESN 601.[9] The creation of a designated Wireless Center within the Essex RECC facility is intended to relieve the wireless state police PSAPs from receiving a portion of the wireless 911 calls currently routed to the wireless state police PSAPs, allow for wireless 911 calls to be routed to a facility with particular expertise in the handling of wireless 911 calls, and allow for the use of the building that houses the Essex RECC to greater capacity.

Enhanced 911

Current Enhanced 911 System

The current enhanced 911 system is an analog-based system that was designed in the 1960s. The system has been successful in delivering 911 services for many years. However, the type of analog services that are imbedded in the existing system are becoming obsolete and are being discontinued throughout the country. Technological advancements have created the necessity for a more advanced system that will offer capabilities (such as text and video messaging) that simply do not exist using today's system. Throughout the nation, the enhanced 911 systems are being overhauled and replaced with new and emerging technologies. This need was recognized by the Legislature, and, therefore, in accordance with the legislation, it is necessary to replace the existing system with a system that uses advanced communications technologies in the infrastructure itself.

The Department does not have the option to continue to maintain the existing system or to simply upgrade the current equipment using the existing infrastructure. The Department does not consider refreshing or upgrading the existing legacy equipment as a long-term solution. Rather, the Department is replacing the current enhanced 911 system with a solution that adheres to national standards, maintains the capabilities and functions of the existing system while offering capabilities that will support new services and tools, and offers the best value to the Commonwealth.

[9] An Emergency Service Number, or "ESN," is a 3-5 digit number that represents one or more emergency service zones. An Emergency Service Zone, or "ESZ," is a geographical area that represents a unique combination of emergency service agencies (e.g., law enforcement, fire, and emergency medical service) that are within a specified 911 governing authority's jurisdiction.

Next Generation 911 Project

In accordance with the legislation's directive, the Department embarked upon a project to review and assess communications technologies that could serve as the basis for a new platform. In 2009, following a competitive procurement process, the Department retained outside consultants to assist with the effort to review and assess the technical, financial, and operational requirements and other matters that would facilitate the migration to a new system. The outside consultants were tasked with reviewing the existing customer premises equipment, or CPE, with the intent of migrating to an IP-based system; analyzing technical requirements; examining possible network facilities; investigating geographic information system, or GIS, requirements and capabilities; and developing system architecture and migration plans. The outside consultants were also charged with undertaking a financial analysis that included gathering pertinent information related to technology availability, funding parameters, and governance matters; gathering information on practices elsewhere in the United States related to ownership, funding, and governance; gathering data from the vendor community related to technology roll out timeframes and costs; and synthesizing this information so that the Department could assess the financial components of the migration to a new system.

Throughout 2009 and 2010, the Department, working in consultation with the outside consultants and representatives from other agencies, continued its analysis and assessment of the issues associated with the migration to a new system, including a review of evolving national standards. In 2009, the Department hosted a series of Next Generation 911 presentations at the Department's offices. In 2010, the State 911 Commission authorized the Department to form a Strategic Sourcing Team ("SST") for the purpose of conducting the solicitation for and the procurement of a Next Generation 911 system and associated matters.

In 2011, the National Emergency Number Association ("NENA") produced a number of Next Generation 911 Standards and other documents, recommendations, and policy briefs regarding the transition to Next Generation 911. In addition to the development of technical and operational standards, NENA engaged in proof of concept trials and demonstrations of the new technology. However, a standards-based Next Generation 911 system was not fully identifiable, and further clarification was necessary.

In 2012, the Department issued a Request for Information ("RFI") to assist the Department in identifying various solutions and gathering information to help the Department assess the capabilities of a Next Generation 911 environment, including all aspects of network, database, geo-based routing, caller location information, applications and appliances, call taking solutions, CPE, support services, maintenance and monitoring, and any other functional element required to meet the acceptance, processing, and delivery of current and anticipated Next Generation 911 payloads. Respondents to the RFI

provided the Department with information about their Next Generation 911 technologies and any alternative capabilities for IP-based call and payload handling.

Following the lengthy and exhaustive efforts set forth above, the Department sought to procure services through a competitive procurement conducted pursuant to *801 CMR 21.00: Procurement of Commodities and Services*.

As authorized by the State 911 Commission, the Department formed an SST for the purpose of conducting the solicitation for and the procurement of a Next Generation 911 system and associated matters. The SST was comprised of members of the Department, the State 911 Commission, and key stakeholders with the required skills and knowledge to assist in the development of a Request for Response ("RFR") and analysis of bid responses.

On October 4, 2013, the Department issued an RFR seeking to procure the services to design, equip, install, operate, monitor, maintain, train, and support a Next Generation 911 system throughout the Commonwealth in a turnkey fashion. The RFR provides that the acquisition method for the contract is fee for service. The contract duration is five (5) years, with one (1) option to renew for a period of five (5) years. The RFR provides that the system shall be fully operational throughout the Commonwealth no later than June 30, 2016. Multiple responses were received.

The SST was assigned the task of analyzing the merits of the proposals submitted. The evaluation process consisted of a review of the written responses, references/financial stability statements, interviews/demonstrations, pricing, and a site visit from which the highest scoring bidder proposed to operate its help desk and network operations center. The SST provided all bidders with the opportunity to provide a Best and Final Offer ('BAFO").

The evaluation process concluded in July, 2014, and the Department selected a bidder who offers the overall best value to the Commonwealth. At a meeting held on August 4, 2014, the State 911 Commission authorized the Department to enter into a contract with the winning bidder, General Dynamics Information Technology ("GDIT"). Accordingly, a contract for Next Generation 911 products and services was executed with GDIT on August 4, 2014.

Enhanced 911 Support

The Department has entered into a contract with Verizon to provide network, database, CPE, and maintenance services for the statewide enhanced 911 system serving the

Commonwealth.[10] The Department's projections assume that the costs for these services will decrease significantly as the Commonwealth migrates to the Next Generation 911 system.

CPE

The Department's projections for Fiscal Year 2015 include costs for new CPE that may be necessary in connection with regional projects or other changes in sites. The Department intends to purchase only new CPE that is necessary to ensure the operation of the enhanced 911 system and, where possible, will transition a PSAP to the Next Generation 911 system rather than expend funds on new enhanced 911 CPE. The Department's projections for Fiscal Year 2016 are intended to ensure that PSAPs can remain operational until conversion to the Next Generation 911 system.

Map Data

Through an interdepartmental service agreement between the Department and the Commonwealth's Office of Geographic Information ("MassGIS"),[11] MassGIS provides updated, synchronized mapping data and information to the Department for use by PSAPs. MassGIS has also dedicated resources to support the Department as it prepares for the implementation of Next Generation 911.

As part of ongoing maintenance, MassGIS will continue updating the street database by adding missing or new streets and correcting erroneous streets. This is part of the core component of the GIS data used in the current PSAP deployment as well as the base of the Next Generation 911 system. MassGIS has acquired aerial imagery used for verification of streets and structures as part of the maintenance effort. MassGIS has contracted 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 prepare for the transition to Next Generation 911. This entails collecting digital and paper maps and incorporating individual parcel line work into the statewide data set. Once the 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 Department contracts with a vendor to provide software support by furnishing base map data updates on a quarterly basis. The Department also contracts

[10] The Department and Verizon executed a contract for Enhanced 911 support services for the period November 1, 2013 through October 31, 2016.
[11] MassGIS is within the Information Technology Division of the Administration and Finance Secretariat.

with a vendor to furnish MassGIS with emergency subscriber listings through an extract of the Automatic Location Information database.

In addition, the Department has engaged MassGIS to assist and support the Department's Wireless Project. By way of background, wireless 911 calls are, with few exceptions, routed to the wireless state police PSAPs and the Wireless Center. The legislation provides, in pertinent part, as follows:

. . . the department shall review and assess the technological and operational capability and financial feasibility of wireless 911 calls being routed to and handled directly by the PSAP in which the caller is located, and if such capability exists, the department shall establish standards, with the commission's approval, by which such PSAPs may receive wireless calls. *See* G.L. c. 6A, § 18B(h).

Based on its review and assessment of the technological and operational capability and financial feasibility of wireless 911 calls being routed to and handled directly by the PSAP in which the caller is located, the Department intends to complete the necessary 911 call routing data analysis and mapping statewide, and to analyze and evaluate the operational impacts associated therewith, with the goal of a statewide deployment of direct wireless 911 call routing and related matters.

Next Generation 911 Consultant

The Department has retained the services of an outside consultant to assist with the Next Generation 911 project. The Department estimates payments to its consultant to assist with the Next Generation 911 project for Fiscal Year 2015 through Fiscal Year 2016.

Next Generation 911 Recurring and Non-Recurring Costs

The Department has projected recurring and non-recurring costs for the Next Generation 911 system based on the contract executed on August 4, 2014 with GDIT.

Interpretive Services

Interpretive services continue to be provided to PSAPs throughout the Commonwealth and for the EDP pursuant to a statewide contract with a contractor.

Mobile PSAP

The State 911 Department owns, operates, controls, and maintains a mobile PSAP. The mobile PSAP is a vehicle outfitted with six (6) 9-1-1 answering positions, one (1) administrative workstation, ten (10) administrative telephones, and seven (7) Telular terminals all connected to the CPE. 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, the Boston Marathon, and as an emergency backup PSAP. The State 911 Department also expects to utilize the mobile PSAP in connection with the transition to Next Generation 911. The Department has included projected expenses of maintenance and monitoring and overall support for the mobile PSAP. Costs associated with the maintenance and monitoring are anticipated to transition to the Next Generation 911 contractor effective Fiscal Year 2017.

Disability Access Program

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, or SCPE, Distribution Service.[12] This program 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 TRS, and captioned telephone relay service, or CTRS, throughout the Commonwealth.[13] The Department has entered into contracts with various equipment vendors to provide the SCPE to persons with disabilities. Further, the Department executes contracts with the Commission for the Deaf and Hard of Hearing and other entities to support this program. In addition, the Department has procured the services of a contractor to provide both TRS and CTRS throughout the Commonwealth.[14] The Department's projections maintain the current funding levels for these services for Fiscal Year 2015 through Fiscal Year 2019.

IV. CONCLUSION

Since the inception of the legislation, the Department has met its statutory obligations while maintaining a stable surcharge at seventy-five (75) cents per month. Such

[12] The statutory definition of "SCPE" is set forth in G.L. c. 155, § 15E.
[13] The statutory definition of "captioned telephone service" is set forth in is set forth in G.L. c. 155, § 15E.
[14] In 2012, the Department, in consultation with the Massachusetts Commission for the Deaf and Hard of Hearing, issued a request for response to procure these services. The Request for Response was approved by the DTC by Order dated May 30, 2012 in D.T.C. 12-3.

expenditures provide maximum safety and value to the public, PSAPs, and persons with disabilites at a surcharge level that has been consistent with the DTC's long-established ratemaking goals of rate stability and continuity.

However, as set forth above, the current enhanced 911 system needs to be replaced with a new system. In addition to the projected costs of the new system, it will be necessary to support the maintenance of two (2) systems for a period of time during the transition from the current enhanced 911 system to the new Next Generation 911 system. In order to fund these extraordinary expenses while maintaining the Department's programs at current levels, it is necessary to adjust the surcharge. The Department anticipates that the increased surcharge will remain in effect until the new system is fully deployed, with the bulk of the non-recurring charges to be incurred and paid during Fiscal Year 2015 and Fiscal Year 2016. After the new system is fully deployed, the Department will assess its revenues and expenses and may petition the DTC for a decrease in the surcharge if warranted.

All of the 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.

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.): Karen Charles Peterson, Commissioner, DTC
Jesse Reyes, Office of the Attorney General
Sandra Callahan Merrick, Office of the Attorney General
Thomas Ashe, Deputy Director, State 911 Department
Karen Robitaille, Fiscal Director, State 911 Department
Louise McCarthy, Administrative Attorney, State 911 Department

EXHIBIT A

STATE 911 DEPARTMENT BUDGETS
FY 2013- FY2015 Expenditures

	FY2013	FY2014*	FY2015**
Beginning Balance	$ 101,566,896	$101,994,746	$ 66,870,395
Revenue	$ 73,643,723	74,685,294	$ 88,456,626
TOTAL FUND REVENUE	**$ 175,210,619**	**$176,680,040**	**$ 155,327,021**
EXPENSES		**TOTALS**	
Administration			
Salary Costs	$ 3,674,424		$ 5,165,972
Agency Expenses	$ 757,351		$ 2,623,013
Employee Reimbursements	$ 63,234		$ 72,500
Workers Comp (DD)	$ 194		$ -
Administrative Expenses(EE)	$ 85,768		$ 293,833
Operational Supplies(FF)	$ 5,155		$ 7,500
Utilities/Space Rental(GG)	$ 117,019		$ 447,180
Consultant Services (HH)	$ 80,902		$ 267,000
Operational Services(JJ)	$ 172,920		$ 360,000
Equipment Purchases(KK)	$ 4,104		$ 25,000
Lease, Maintenance, Repair Services(LL)	$ 23,543		$ 40,000
Bldg. Maintenance, Repairs (Includes add. $$ for electrical costs at PSAPs)(NN)	$ 75,884		$ 111,000
IT Services, Equipment(UU)	$ 128,628		$ 1,000,000
PY Deficiencies	$ 125,321		$ -
Capital Projects	$ -		$ 15,000
TOTAL ADMINISTRATION	***$ 4,557,096***	***$0***	***$ 9,288,985***
Programs			
Training	$ 602,501		$ 500,000
Public Education	$ 32,552		$ 200,000
Interpretive Services (Qwest Language Line)	$ 64,464		$ 75,000
Training Grant	$ 1,926,085		$ 4,830,000
EMD Grant	$ 1,065,307		$ 2,070,000
Support Grant	$ 14,916,864		$ 24,623,952
Incentive 2			
Incentive 3-9			
Incentive 10+			
Incentive RECC			
Incentive RECC (1.4%)			
Wireless PSAP MSP	$ 3,536,777		$ 3,933,000
Wireless Center (ESN 601)	$ 43,723		$ 2,831,037
PSAP Regional Development	$ 4,498,922		$ 8,000,000
PSAP Regional Development Roll Over	$ 9,016,953		$ -
Additional Grant Funding for Eligible Entities as described in the section 18B (I) of the legislation	$ -		$ -
TOTAL PROGRAMS	$ 35,704,148	$0	$ 47,047,989
Enhanced 9-1-1			
Map Data	$ 1,699,293		$ 2,870,819
ISA MASS GIS	$ 1,699,293		$ 2,762,319
Software support	$ -		$ 105,000
ESL	$ -		$ 3,500
E 9-1-1 Support	$ 22,185,743		$ 26,452,110
CPE	$ 2,954,452		$ 225,000
Mobile PSAP	$ 6,466		$ 60,051
NG 911 Consultant	$ 177,372		$ 100,000
MBI	$ 2,848,851		$ -
NG/Wireless Project	$ -		$ 42,862,548
TOTAL E9-1-1	$ 29,872,177	$ -	$ 72,570,528
Disability Access Program			
Relay	$ 1,987,872		$ 2,500,000
SCPE	$ 342,389		$ 500,000
CapTEL	$ 854,790		$ 1,000,000
TOTAL Disability Access	$ 3,185,051	$0	$ 4,000,000
TOTAL EXPENSES	**$ 73,318,472**	$71,669,535	$ 132,922,502
Interest	$ 102,599	$90,402	$ 75,000
FY14 obligations rolled into FY15		$38,230,512	
YEAR END FUND BALANCES	$ 101,994,746	$66,870,395	$ 22,479,519

*Final expenditures by program not yet available
**projected expenditures

Exhibit B

STATE 911 DEPARTMENT BUDGETS

FY 2015- FY 2019

ESTIMATED FUND REVENUE	FY2015	FY2016	FY2017	FY2018	FY2019
Beginning Balance	$ 66,870,355	$ 22,479,519	$ 25,543,662	$ 50,234,718	$ 74,558,219
Revenue	$ 88,456,626	$ 120,622,672	$ 120,622,672	$ 120,622,672	$ 120,622,672
Interest	$ 75,000	$ -	$ -	$ -	$ -
TOTAL FUND REVENUE	**$ 155,402,021**	**$ 143,102,191**	**$ 146,166,334**	**$ 170,857,390**	**$ 195,180,891**
EXPENSES	**TOTALS**	**TOTALS**	**TOTALS**	**TOTALS**	**TOTALS**
Administration					
Salary Costs	$ 5,165,972	$ 5,346,781	$ 5,533,918	$ 5,727,605	$ 5,928,072
Agency Expenses	$ 2,623,013	$ 2,623,013	$ 2,623,013	$ 2,623,013	$ 2,623,013
Employee Reimbursements	$ 72,500	$ 72,500	$ 72,500	$ 72,500	$ 72,500
Workers Comp (DD)	$ -	$ -	$ -	$ -	$ -
Administrative Expenses(EE)	$ 293,833	$ 293,833	$ 293,833	$ 293,833	$ 293,833
Operational SuppExes(FF)	$ 7,500	$ 7,500	$ 7,500	$ 7,500	$ 7,500
Utilities/Space Rental(GG)	$ 447,180	$ 447,180	$ 447,180	$ 447,180	$ 447,180
Consultant Services (HH)	$ 267,000	$ 267,000	$ 267,000	$ 267,000	$ 267,000
Operational Services(II)	$ 360,000	$ 360,000	$ 360,000	$ 360,000	$ 360,000
Equipment Purchases(KK)	$ 25,000	$ 25,000	$ 25,000	$ 25,000	$ 25,000
Lease, Maintenance, Repair Services(LL)	$ 40,000	$ 40,000	$ 40,000	$ 40,000	$ 40,000
Bldg. Maintenance, Repairs (NN)	$ 110,000	$ 110,000	$ 110,000	$ 110,000	$ 110,000
IT Services, Equipment(UU)	$ 1,000,000	$ 1,000,000	$ 1,000,000	$ 1,000,000	$ 1,000,000
Capital Projects	$ 1,500,000	$ -	$ -	$ -	$ -
TOTAL ADMINISTRATION	**$ 9,288,985**	**$ 7,969,794**	**$ 8,156,931**	**$ 8,350,618**	**$ 8,551,085**
Programs					
Training Program	$ 500,000	$ 500,000	$ 500,000	$ 500,000	$ 500,000
Public Education	$ 200,000	$ 200,000	$ 200,000	$ 200,000	$ 200,000
Training Grant (FY15 - 7%; FY16 - 5.23%; FY17-19-4.01%)	$ 4,830,000	$ 4,626,282	$ 4,836,969	$ 4,836,969	$ 4,836,969
EMD/Regulatory Compliance Grant (FY15 -8%;FY16-2.25%; FY17-19-1.73%)	$ 2,070,000	$ 1,990,274	$ 2,086,772	$ 2,086,772	$ 2,086,772
Support Grant (FY15 - 25%; FY16- 21%; FY17-19 - 18.75%)	$ 19,340,074	$ 18,575,891	$ 22,616,751	$ 22,616,751	$ 22,616,751
Incentive Grant (2 Communities) (FY15-19 0.5%)	$ 448,063	$ 442,283	$ 603,113	$ 603,113	$ 603,113
Incentive Grant (3-9 Communities) (FY15-19 - 1%)	$ 702,500	$ 884,566	$ 1,206,227	$ 1,206,227	$ 1,206,227
Incentive Grant (10+ Communities) (FY15-19 1.5%)	$ 587,344	$ 1,326,849	$ 1,809,340	$ 1,809,340	$ 1,809,340
Incentive Grant (RECC) (FY15-19 - 4%)	$ 3,545,971	$ 3,538,265	$ 4,824,907	$ 4,824,907	$ 4,824,907
Wireless State Police PSAP Grant (FY15 5.7%; FY16-4.73%; FY17-19 3.26%)	$ 3,933,100	$ 3,768,252	$ 3,932,299	$ 3,932,299	$ 3,932,299
Wireless Center (SDE - ESN 601)	$ 2,831,037	$ 2,831,037	$ 2,831,037	$ 2,831,037	$ 2,831,037
Development Grant	$ 8,000,000	$ 8,000,000	$ 8,000,000	$ 8,000,000	$ 8,000,000
TOTAL PROGRAMS	$ [illegible]	$ [illegible]	$ [illegible]	$ [illegible]	$ [illegible]
Enhanced 9-1-1					
Enhanced 9-1-1 Support	$ 26,452,110	$ 13,093,794	$ -	$ -	$ -
CPE	$ 225,000	$ -	$ -	$ -	$ -
Map Data	$ 2,870,819	$ 3,007,870	$ 3,094,851	$ 3,184,441	$ 3,276,719
ISA MASS GIS	$ 2,762,319	$ 2,899,370	$ 2,986,351	$ 3,075,941	$ 3,168,219
Software support	$ 105,000	$ 105,000	$ 105,000	$ 105,000	$ 105,000
ESL	$ 3,500	$ 3,500	$ 3,500	$ 3,500	$ 3,500
Next Generation 911 Consultant	$ 100,000	$ 100,000	$ -	$ -	$ -
NG 911 - Non-Recurring	$ 34,873,151	$ 20,589,517	$ 1,150,000	$ 1,150,000	$ 1,150,000
NG 911 - Recurring	$ 7,989,397	$ 21,978,803	$ 25,980,734	$ 26,081,696	$ 26,350,928
Interpretive Services (Qwest Language Line)	$ 75,000	$ 75,000	$ 75,000	$ 75,000	$ 75,000
Mobile PSAP	$ 60,051	$ 60,051	$ 26,684	$ 10,000	$ 10,000
TOTAL E9-1-1	$ [illegible]	$ [illegible]	$ [illegible]	$ [illegible]	$ [illegible]
Disability Access Program					
Specialized Customer Premise Equipment	$ 500,000	$ 500,000	$ 500,000	$ 500,000	$ 500,000
TRS	$ 2,500,000	$ 2,500,000	$ 2,500,000	$ 2,500,000	$ 2,500,000
CapTEL	$ 1,000,000	$ 1,000,000	$ 1,000,000	$ 1,000,000	$ 1,000,000
TOTAL Disability Access	$ 4,000,000	$ 4,000,000	$ 4,000,000	$ 4,000,000	$ 4,000,000
TOTAL ESTIMATED EXPENSES	**$ 132,922,503**	**$ 117,558,529**	**$ 95,931,015**	**$ 96,299,171**	**$ 96,861,148**
ESTIMATED FUND BALANCES	**$ 22,479,519**	**$ 25,543,662**	**$ 50,234,718**	**$ 74,558,219**	**$ 98,319,743**

Notes:

Assumes surcharge is increased to $1.25 effective February 1, 2015; Remitted effective March 2015

Salary increased to reflect changes in staffing needs, steps, increase and fluctuation in fringe/indirect rates

8/4/14 start date of NG 911 Contract

Assumes interest rate is consistent with FY14; FY15 investment would be reduced to ensure cash flow; FY16 investment reduced to 0

Increase GG for leased space - Admin. Offices

Assumes Mobile PSAP maintenance & monitoring is supported by NG vendor FY17-19