



**STATE OF CONNECTICUT**  
**DEPARTMENT OF EMERGENCY SERVICES AND PUBLIC PROTECTION**  
**LEGAL AFFAIRS UNIT**

**Comment Summary and Response**

**The Department of Emergency Services and Public Protection (hereafter the “Department”) received one written submission from the Connecticut Conference of Municipalities (CCM) regarding the proposed regulations: PR2016-050 (PSAP Establishment and Operation), PR2018-013 (9-1-1 Service Utilization Plan), and PR2018-012 (Emergency Telecommunicator Training and Certification). The Department responds to the written submission below:**

**A. Comments concerning PR2016-050 (PSAP Establishment and Operation)**

**Comment 1:** “CCM understands the need to modify existing regulations to ensure continuity of the E 9-1-1 system. As referenced in the agencies draft proposal, the landscape has certainly changed. With that being said, these proposals may have an adverse impact on established PSAPs. Specifically, the requirement that each PSAP be capable to operate for 72 hours. It is unclear whether PSAPs can meet this requirement by simply providing a plan to ensure proper fuel supply or whether a conversation to a new generator that has the capacity for 72 hours would be required. **CCM would ask for greater clarification be considered prior to adoption.**”

**Response to Comment 1:** The Proposed Regulations require that PSAPs be able to operate for seventy-two (72) hours. The largest single cause of PSAP failures during storms continues to be power problems. Connecticut is a heavily forested state with a history of large scale power failures resulting from tree falls across power lines. When a PSAP loses power and its generator fails to work, 9-1-1 calls from that community are re-routed to another PSAP, which cannot easily dispatch the emergency services of the failed PSAP, and during storms has problems of their own to deal with. The public has a right to expect that their emergency services will continue to operate during weather and/or power events, and national standards for power services critical to the preservation of life (which is the category PSAPs are in) require the ability to operate with a minimum of 72 hours of power without refueling. Regardless of contracts a municipality might have, in an environment where every customer needs fuel, the roads are impassable due to downed trees, and the fuel companies’ own employees cannot get to work, it is unrealistic to expect that timely daily fuel deliveries will be possible. FEMA informs us that we can expect to be on our own for several days before federal help can arrive, even in large-scale disasters. Therefore, simply providing a plan for ensuring proper fuel supply is not sufficient in an emergency situation.

*1111 Country Club Road  
 Middletown, CT 06457  
 Phone: (860) 685-8000/Fax: (860) 685-8354  
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There are a number of measures that PSAPs can take if their power system will not operate for 72 hours. They can plan to reduce the load on the generator of other, non-critical operations that are supported by their generator (since increased loads increase fuel consumption). They can acquire a larger fuel tank for the same generator. They may be able to convert to natural gas fuel source if that is available to them. There are other problems that have prevented generators from running in PSAPs, even where there was sufficient fuel – clogged fuel filters, overheated engines, all issues that could have been avoided had preventative maintenance been performed properly to those generators.

DSET will be adopting policies to work with PSAPs that need to make changes to their power systems. For funded municipalities (populations above 40,000) capital funding dollar-for-dollar matches of up to 12.5% of their annual state subsidy may be available.

**Comment 2:** “There are a number of provisions in the proposed regulations regarding the requirements of each telecommunicator workstation. Specifically, that DSET would have greater oversight and authority for each PSAP. While CCM understands the need to ensure each facility has the capacity to properly operate E 9-1-1 activity, any changes on workstations may be additional burdens and costs for each facility. **CCM would ask that this be examined prior to implementation to provide each PSAP the flexibility to maintain operations without imposing greater burden.**”

**Response to Comment 2:** The Department declines the commenter’s request. These are not new requirements, and are referring to equipment that is provided by DSET to the PSAPs, and not to equipment or furniture provided by the PSAPs themselves. The new equipment for NG911 now provided in all Connecticut PSAPs replaced equipment previously provided, which had similar requirements in the existing regulation.

**Comment 3:** CCM appreciates provisions in the proposed regulations that require greater interaction with the municipal chief executive officer regarding planning and coordination. In regards to each PSAP providing address data, it is unknown what the implications may be for the new reporting requirements. The proposal to require each municipality to provide address data necessary for call routing and mapping capability may be an undue and potentially costly burden on towns and cities. **Prior to implementation, a further review should take place on a PSAPs financial and workforce implications.**

**Response to Comment 3:** The Department declines the request for further review. Municipalities communicate regularly with DSET to provide address and map data to correctly show and route 9-1-1 calls. From the very beginnings of the E9-1-1 system in Connecticut in the 1980s, when the Master Street Address Guide needed to be developed, every town was responsible for driving on every street in their jurisdiction and verifying the block face address ranges, and the boundaries of their emergency service districts (especially important in towns that have multiple Fire and/or EMS providers). Municipalities are the keepers of that particular

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Middletown, CT 06457  
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information related to street names, authorized addresses, parcel sizes and shapes, and their emergency service boundaries. DSET uses that data to ensure that emergency calls are sent to the correct PSAP. The proposed regulation will not require municipalities to hire more staff to meet these requirements

**Comment 4:** “Throughout the regulations the term “secondary PSAP” is referenced. These are important facilities, especially in an effort to encourage greater consolidation. CCM is unaware whether the term “secondary PSAP” is properly defined to ensure that it can be utilized to its most effective capacity. **CCM would therefore ask a review of this and if necessary inclusion to provide greater clarity on secondary PSAP usage for future regulatory proposals.**”

**Response to Comment 4:** As defined in Regulations of Connecticut State Agencies Sec. 28-27a-1a, “Secondary PSAP or secondary dispatch location” means a facility operated on a twenty-four hour basis that receives 9-1-1 calls, including ANI and ALI, if equipped to receive this data, from one or more PSAPs by call transfer or other means, and dispatches to the appropriate public safety agency. Existing and proposed DSET regulations discourage the use of secondary answering points, and reduce funding to PSAPs that utilize secondary answering points, because they delay the delivery of emergency services and cause the public to explain their situation twice to two different call centers, which creates public dissatisfaction with emergency services and creates complaints.

#### **B. Comments concerning PR2018-013 (9-1-1 Service Utilization Plan)**

**Comment:** “The proposal appears to address the requirement that each PSAP submit a utilization plan indicating it is in compliance with all relevant statutes. The proposal requires particular content to be included which are referenced in the above mentioned regulations. **CCM would ask that as modifications to the proposed regulations be made through the regulatory process that they be properly codified in this proposal as well.**”

**Response to Comment 1:** The list of items required in the PSAP service utilization plan content mirrors those in the existing regulations which required a plan filing. The proposed regulation adds new items specific to Next-Generation 9-1-1 and the new requirement for 72 hours of generator operation. Therefore, the new list has been brought up to date with regard to submitted regulations.

#### **C. Comments concerning PR2018-012 (Emergency Telecommunicator Training and Certification)**

**Comment:** “The proposal appears to be reasonable modifications to telecommunicator training in order to properly operate the Next Gen 911 system. However, with new training requirements there may be additional costs that would likely have be absorbed at the municipal level. These costs may be direct training costs, or the secondary costs associated with overtime to provide the

*1111 Country Club Road  
Middletown, CT 06457  
Phone: (860) 685-8000/Fax: (860) 685-8354  
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training or coverage. **CCM would ask that prior to approval a cost analysis be conducted on the financial cost of these trainings for municipal and regional PSAPs.”**

**Response to Comment:** The Department declines the request for an additional cost based analysis. The Department’s Fiscal Note, posted on 10/18/18, showed no fiscal impact to municipalities. The Proposed Regulation updates the curriculum used for all incoming telecommunicators for state-provided instruction in Connecticut. It does not change the amount of time for the curriculum, and therefore has no cost impact on municipalities in the state.

#### **D. Agency Technical Corrections**

##### **1. PR2016-050, Sec. 28-27-22a (Definitions):**

Definitions modified for proper form. Definition of “Division” revised to “has the same meaning as provided in section 28-25 of the Connecticut General Statutes”.

##### **2. PR2018-013, Sec. 28-27a-1a, (Definitions)**

“Division” has the same meaning as provided in section 28-25 of the Connecticut General Statutes” added to definitions. PSAP definition modified for proper form.

##### **3. PR2018-013, Sec. 28-27a-1a, (Definitions), Sec. 28-27a-2a(b)(10) (9-1-1 PSAP service utilization plan content)**

Substantive provision removed from Answering position definition and added to Sec. 28-27a-2a(b)(10).

##### **4. Sec. 28-27a-2a(b)(7) (9-1-1 PSAP service utilization plan content)**

A PSAP Operator has been changed to All PSAP Operators. No substantive change from previous regulation.

**Colin Milne**

Digitally signed by Colin Milne  
DN: cn=Colin Milne, o=DESPP,  
ou=Legal Affairs Unit,  
email=Colin.Milne@ct.gov, c=US  
Date: 2019.01.31 09:55:45 -05'00'

Colin Milne  
Staff Attorney 2

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*1111 Country Club Road  
Middletown, CT 06457  
Phone: (860) 685-8000/Fax: (860) 685-8354  
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