

Page 3, Line 7: “regional dispatch centers”...what, specifically, is being referred to here? Does it refer to the existing regional PSAPs (Hartford, St Albans, Lamoille County and Shelburne) or are is it also including other existing dispatch centers such as “one municipality” centers (i.e., Burlington) or centers that serve multiple agencies/municipalities but are not PSAPs (i.e., Montpelier/Capitol West)

Page 4, line 10: “...the exceptional dispatch services currently in place...”. Same question as above, who does this include? i.e., who are we not to jeopardize?

Page 7, line 11: (Maria Royle question) After consultation with Board staff members, we believe the definition of municipality should stay the same as it currently is in this section and also be more precisely defined later in the bill. The first definition allows the Board to require that “political subdivisions of the State” (such as schools) meet the Board’s addressing standards and do not carve out an exception to the requirement. We would not expect schools to be assessed a separate fee for dispatch services, however.

Page 7, line 19: (Maria Royle question) “...private safety agencies.”... Board staff believes this should remain and is a reference to private EMS services, hospitals, Vermont National Guard, UVM, and/or 988 or other similar services.

Page 8, line 7: Definition of Regional Dispatch Center...I think clarification is needed on the word “regional”...do you mean serving more than one municipality? serving some number of population? Or would an existing single municipality dispatch center also qualify as a regional dispatch center as seems to be suggested at line 12-13?

Page 10...membership of the Board. Concerned about loss of public members. If the intent is that the legislatively appointed members be “members of the public” should the legislation state that? I also see just two such members, unless you are also including the member appointed by the Commissioner of Health?

...I agree with Commissioner Morrison that the restructuring of who appoints these members brings the Board further from the Governor which may not be in the best interest of overall accountability for Board activities.

p. 11, line 1: Rural and urban representation is critical and should be included somewhere in the requirements for Board membership...not sure where?

p. 14, line 5: “safety based response time standards” should be removed. Response times are not under the control of the dispatch function. Perhaps you mean safety-based call handling protocols or standards? Those would be covered in the technical and operational standards development.

p. 14, line 6: remove the general reference to “wireless communications” and narrow to radio or emergency communications dead zones”. The former is too broad a scope.

p. 14, line 9: remove entirely. A plan to increase the wireless communications coverage in Vermont should not be the responsibility (or joint responsibility) of the 911 Board or its successor. The Board certainly supports efforts to increase wireless coverage in the state, but it should not be the Board’s responsibility to plan for it.

p. 14, line 11: What is the intent of “shall develop a model and process for ensuring every municipality is a member of a regional dispatch center”? May link back to a clearer definition of regional dispatch center.

p. 15, line 9: What is the expectation of when regional dispatch centers should provide this information to the Board? Is this meant to be provided now, prior to the development of technical and operational standards or later, after those standards are finalized? Or perhaps both? It may be beneficial to know what the existing centers are doing now as part of the initial data gathering and if this gives us the authority to request this information that is good.

p. 15, line 12: “..mapping of response times for agencies within...” Response times and data collection for same are beyond the scope of the Board’s work.

p. 15, line 14: specify “radio” or “emergency communications” dead zones.

p. 15, line 15: what is to be included in call volume and how will that data be collected? Need a definition of call volume that includes emergency, non-emergency, self/responder initiated, radio traffic and likely other data points.

p. 15, line 19: noting that “dispatching mental health services” is not at the discretion of the comm center and will require that all involved agencies are at the table to develop a standardized protocol. Work is underway at the national level to establish standards related to 911/988 interactions, but will still require the input of the response agencies to implement.

p. 16, line 8: “an agency may receive dispatching services from an entity outside Vermont, subject to Board approval”. What is the expectation for meeting that Board approval? Based on what?

p. 17, line 1: my reminder that the VUSF revenue challenges continue unresolved.

p. 18, line 13: add “emergency” before “vehicles and associated equipment”

p. 20: I still have questions about the implementation of this funding model, specifically

line 8: what is the expectation as to what will be included in the “base fee”?

line 9: what is the meaning of “equalized statewide grand list” as was discussed on 3/16?

line 11: how is the “statewide dispatch budget” expected to be determined?

line 12: what is included in the definition of call volume? (See earlier note)

line 14: what is the expectation for determining the Board’s administrative costs for oversight and management? Are we talking simply salaries here or also the provision of statewide services such as CAD or other services?

p. 21, line 1: what is meant by “the ratio of a municipality’s call volume that was served by the municipality?”

p. 21, line 9: refers to a new regional dispatch center...do you mean to include centers that are existing prior to July 1 2024? If not, is the expectation that the municipalities served by these existing centers are NOT subject to the assessments/funding formulas? This question also goes to the concern/question about the definition of a regional dispatch center.

p. 23, line 7: restricting access to specific customer information “...held by the Board,...or regional dispatch center”. The 911 data needs to be protected as it is currently (and actually further by specifying that 911 recordings are not public records), but I’m not sure of the impact on responders/investigators of restricting access to information held by regional dispatch agencies.

p. 26, line 5: says “may” develop a plan. Should it “will” develop a plan?

p. 26, line 6: include personnel along with infrastructure, equipment.

*Note: As discussed at the 3/16/23 testimony, the transfer of assets, infrastructure, and personnel from DPS to the Board needs significant additional discussion but should ultimately result in direct control by the governing authority of necessary assets/infrastructure/personnel specific to statewide emergency communications services.*

p. 27, line 10... specifies that the committee shall comprise “technology experts” but I don’t see that specified in the list of committee members?

p. 27...list of committee members should include Sheriff’s Association representative.

p. 28, line 16: “one member appointed by Vermont Care Partners”. Don’t object to this but the expectation should be clear that there are many other stakeholders impacted by any changes to mental health response. Emergency communications operations does not include unilaterally dictating specific response configurations.

p. 30, line 6: is there something specific that is meant by “referring to and incorporating any existing relevant data collected by the state or municipal entity”? Want to make sure I understand what this is getting to.

p. 30, line 16: specify “radio” or “emergency communications “ dead zones.

p. 31, line 11: may want to leave open the potential for “other statewide services” that support public safety communications. I’m thinking specifically of electronic call handling protocols that would potentially include pre-defined response configurations (in consultation with impacted agencies). But there may be additional services as well.

P. 32, line 15: I’m still cautious about this aggressive timeline. Perhaps Board should report back in January 2024 as to the feasibility of that timeline?

p. 34, line 1: is the expectation that the funding model in the bill would be used to make these fee determinations? Need to understand the impact of that on municipalities/agencies. Could it be supported by the transition fund?

p. 34, line 7 – 12. Need to understand the impacts on bargaining agreements for all impacted agencies. Does this need to be part of the initial data collection requirements?

p. 34, line 14: What are the obligated funds and to whom are they obligated? Shouldn’t these funds be withheld until a statewide plan is developed?