



Commonwealth of Massachusetts
Dukes County Sheriff's Office

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January 2, 2019

Mr. Paul H. Foley
DRI Coordinator/ Planner
Martha's Vineyard Commission
33 New York Ave
Oak Bluffs, MA 02557

Via E-mail: foley@mvcommission.org

Re: DRI 677 - Verizon Tower Extension in Tisbury – Public Comment

Dear Mr. Foley:

This letter will serve as a formal public comment, submitted by January 10, 2019 deadline of written record, to request a condition of approval of the proposed extension of Verizon Tower in Tisbury (DRI 677) from 77 feet to 130 feet by Martha's Vineyard Commission.

Verizon stated in its testimony as part of the application that the Tower "is strictly used to transmit Police, Fire, EMS, and emergency 911 calls. Emergency telecommunication calls are sent off-Island, go through a 911 call center, then come back for emergency personnel to be dispatched. Similarly, AT&T emergency calls are sent off-Island, but must come back through the Verizon tower to be sent out to local dispatch. 'This tower serves 911 calls. It's an emergency services tower.'" In essence, Verizon holds itself out as a Public Safety Communication Access Point, as far as, routing of calls to the Dukes County Regional Emergency Communication Center. As such, Verizon should be obligated to maintain critical communication infrastructure across the Island of Martha's Vineyard, including but not limited to its Radio Tie Lines (RTNA lines), which serve the Public Safety Communication System and thus ensure public safety. RTNA lines are essential to the relay of the emergency communications on the Island as a primary means of communication, and will become a necessary backup means after the eventual transition to a new microwave backhaul system, currently in development by State 911 Department grant funding.

We are requesting that Martha's Vineyard Commission includes the following as a condition of approval for its decision in Verizon Tower Extension - Tis (DRI 677): "Verizon is obligated to continue to operate, maintain, and prioritize the repair and replacement of its Radio Tie Lines (RTNA Lines) on Martha's Vineyard until such time when the RTNA Lines no longer serve as a primary or secondary means of relaying emergency communication signals due to the upgrades and/or replacement of the Public Safety Communication System."

Please let me know if you have any questions. Thank you.

Sincerely,

Robert W. Ogden
Sheriff of Dukes County

Integrity ★ Professionalism ★ Respect