BILLING CODE: 3510-60-P

DEPARTMENT OF COMMERCE
National Telecommunications and Information Administration
Docket No: 120509050-1050-01
RIN: 0660-XC001

Development of the State and Local Implementation Grant Program for the Nationwide Public Safety Broadband Network

AGENCY: National Telecommunications and Information Administration, U.S. Department of Commerce.

ACTION: Request for Information.

SUMMARY: The National Telecommunications and Information Administration (NTIA) is issuing a Request for Information (RFI) seeking public comment on various issues relating to the development of the State and Local Implementation grant program, which NTIA must establish pursuant to the Middle Class Tax Relief and Job Creation Act of 2012 to assist state and local governments in planning for a single, nationwide interoperable public safety broadband network. NTIA intends to use the input from this process to inform the development of programmatic requirements to govern the state and local planning grants program.

DATES: Comments must be received by June 15, 2012 at 5:00 p.m. Eastern Daylight Time.

ADDRESSES: Comments may be submitted by email to SLIGP@ntia.doc.gov. Comments submitted by email should be machine-searchable and should not be copy-protected. Written comments also may be submitted by mail to: National Telecommunications and Information Administration, U.S. Department of Commerce, HCHB Room 4812, 1401 Constitution Avenue, NW, Washington, DC 20230. Please note that all material sent via the U.S. Postal Service (including Overnight or Express Mail) is subject to delivery delays of up to two weeks due to

mail security procedures. Responders should include the name of the person or organization filing the comment, as well as a page number, on each page of their submissions. Paper submissions should also include an electronic version on CD or DVD in .txt, .pdf, or Word format (please specify version), which should be labeled with the name and organizational affiliation of the filer and the name of the word processing program used to create the document. All emails and comments received are a part of the public record and will generally be posted to the NTIA website (http://www.ntia.doc.gov) without change. All personally identifying information (for example, name, address, etc.) voluntarily submitted by the commenter may be publicly accessible. Do not submit Confidential Business Information or otherwise sensitive or protected information.

FOR FURTHER INFORMATION CONTACT: Laura M. Pettus, Communications Program Specialist, Office of Telecommunications and Information Applications, National Telecommunications and Information Administration, U.S. Department of Commerce, 1401 Constitution Avenue, NW, Room 4878, Washington, DC 20230; telephone: (202) 482-4509; email: lpettus@ntia.doc.gov. Please direct media inquiries to NTIA's Office of Public Affairs, (202) 482-7002.

SUPPLEMENTARY INFORMATION:
Background
On February 22, 2012, President Obama signed the Middle Class Tax Relief and Job Creation Act of 2012 (Act).1 The Act meets a long-standing priority of the Obama Administration to create a single, nationwide interoperable public safety broadband network that will, for the first time, allow police officers, fire fighters, emergency medical service professionals, and other public safety officials to communicate with each other across agencies

1 Middle Class Tax Relief and Job Creation Act of 2012, Pub. L. No. 112-96, 126 Stat. 156 (2012) (Act).

and jurisdictions. Public safety workers have long been hindered by incompatible, and often outdated, communications equipment and this Act will help them to do their jobs more safely and effectively.

The Act establishes the First Responder Network Authority (FirstNet) as an independent authority within NTIA and authorizes it to take all actions necessary to ensure the design, construction, and operation of a nationwide public safety broadband network (PSBN), based on a single, national network architecture.2 FirstNet is responsible for, at a minimum, ensuring nationwide standards for use and access of the network; issuing open, transparent, and competitive requests for proposals (RFPs) to build, operate and maintain the network; leveraging, to the maximum extent economically desirable, existing commercial wireless infrastructure to speed deployment of the network; and overseeing contracts with non-federal entities to build, operate, and maintain the network.

Additionally, the Act charges NTIA with establishing a grant program to assist State, regional, tribal, and local jurisdictions with identifying, planning, and implementing the most efficient and effective means to use and integrate the infrastructure, equipment, and other architecture associated with the nationwide PSBN to satisfy the wireless and data services needs of their jurisdiction.3 Up to $135 million will be available to NTIA for the State and Local Implementation grant program.4 NTIA must establish requirements for this program not later than six months after the date of enactment (i.e., August 22, 2012). The programmatic requirements for the State and Local Implementation grant program must include, at a minimum, a determination of the scope of eligible activities that will be funded, a definition of eligible costs, and a method to prioritize grants for activities that ensure coverage in rural as well as

2 *Id.* at § 6206(b)(1).
3 *Id.* at § 6302(a).
4 *Id.* at § 6301(c).

urban areas.[5]

NTIA is requesting public comment on certain aspects of the Act's provisions relating to the establishment of the State and Local Implementation grant program.

Request for Comment
The Consultation Process
1. Section 6206(c)(2) of the Act directs FirstNet to consult with regional, State, tribal, and local jurisdictions about the distribution and expenditure of any amounts required to carry out the network policies that it is charged with establishing. This section enumerates several areas for consultation, including:

(i) construction of a core network and any radio access network build-out; (ii) placement of towers;
(iii) coverage areas of the network, whether at the regional, State, tribal, or local level;
(iv) adequacy of hardening, security, reliability, and resiliency requirements;
(v) assignment of priority to local users;
(vi) assignment of priority and selection of entities seeking access to or use of the nationwide public safety interoperable broadband network; and
(vii) training needs of local users.

What steps should States take to prepare to consult with FirstNet regarding these issues?
a. What data should States compile for the consultation process with FirstNet?
b. Should this activity be covered by the State and Local Implementation grant program?

- Establish the single point of contact for broadband implementation activities, whether a new entity or ideally by leveraging an existing position such as the SWIC or other public safety agency with established stakeholder relationships.
- Establish the necessary working groups or leverage existing workgroups of public safety stakeholders with representation from State, Local and Tribal (Jurisdictions) entities.
- The grant funded discovery process should include:
  - *Inventory all Stakeholder agencies within the State and assure up-to-date point of contact information*
  - *Inventory First and Secondary responders along with appropriate governmental and non-governmental support personnel to determine the number and category of prospective users to help develop the cost model for the State*

- *Inventory backhaul (fiber and microwave) resources, final mile, tower space and useable building sites which may be suitable for sharing*
- *Survey the Jurisdictions to assess the critical coverage/capacity requirements*
- *Survey the Jurisdictions to assess functional requirements for end users*
- *Determine the appropriate areas of coverage for adequate public safety service to metro and rural areas*

- This discovery activity should be covered under the SLIGP grant process and include program management, program administration, consultation for fiber route/design, microwave backhaul options and for 4G LTE wireless optimization. In addition, the grant should support funding for outreach and education on what the NPSBN means to the existing interoperable communications framework for State, Local and Tribal Public Safety entities so that they can supply accurate and appropriate input into the discovery efforts. This will also help establish buy-in and increase the adoption rate when we get to the roll-out phase.

2. The Act requires that each State certify in its application for grant funds that the State has designated a single officer or governmental body to serve as the coordinator of implementation of the grant funds. [6]

a. Who might serve in the role as a single officer within the State and will it or should it vary for each State?

b. Who might serve on the governmental body (*e.g.*, public partners, private partners, technical experts, Chief Information Officers, SWIC, finance officials, or legal experts)?

Established mechanisms, governing bodies, processes and procedures for public safety should be reused and utilized whenever possible. Since this is a public safety grant, grants administration should follow existing public safety grant processes and utilize the U.S. Department of Homeland Security State Administrative Agencies (SAA). These agencies can leverage their existing grants management expertise and public safety stakeholder relationships (AZDOHS) to benefit the broadband grants process. AZ recommends that grant funds be awarded through the existing homeland security structure and may be subawarded to a single agency (state or local) to administer and build out the single statewide system.

The optimal agency/position for the single point of contact for FirstNet implementation (program administration) would be the Statewide Interoperability Coordinator (SWIC), although State's should have flexibility in determining this position. At a minimum, all grant awards should be recommended or coordinated through the SWIC Office. If a State has not provided funding for the SWIC role they should reconsider the value of

the position in light of the NPSBN effort otherwise their active participation and ability to provide the connection to Public Safety stakeholders may be compromised.

Through their SWIC, States have a recognized and well established mechanism for public safety stakeholders and the States, to communicate and coordinate information among themselves and with the federal government. This existing infrastructure should be capitalized on and reused for this effort as much as possible.

Regarding facilitating stakeholder input and establishing or leveraging existing governing bodies, the initial focus should be with Public Safety stakeholders to assure that they are aware of the impacts and can provide their much needed input. As the program progresses additional resources can be brought in as appropriate. It would be beneficial to bring on the State CIO early in the process to assure the IP network components of the RAN are understood. There may be opportunities to bring in technical experts to perform some analysis in parallel with the local end user information gathering to reduce the overall timeline, however, until FirstNet is stood up and can provide overall direction the analysis will be premature.

For Arizona, the SWIC and the Public Safety Interoperable Communications office will be working with our Statewide Interoperability Governing Body (SIGB), the Public Safety Communications Advisory Commission (PSCC) and their Arizona Public Safety Broadband Network (AZPSBN) working group comprised of executive, operational and technical representatives from multiple disciplines and jurisdictions. Key additional stakeholders beyond the AZPSBN working group are currently the State CIO, Deputy CIO and the Director for the Digital Arizona Program. The program managers of both the AZPSBN and the Digital Arizona Program are participating in regular meetings on each of the programs.

c. How should the States plan to involve the local entities in the State and Local Implementation grant program?

States should be encouraged to use existing communications paths which have been successful in introducing previous Public Safety Interoperability programs and concepts (NECP Goal I and II, for instance). For some states, that may be the operator of a statewide LMR system, in others it may be through the FEMA and Emergency Managers and still others may have an independent SWIC and SIGB which meet regularly and communicate often.

Existing structures should be leveraged whenever possible. In Arizona, our SIGB and the SWIC's Office have established relationships with the Public Safety Community

and an existing outreach effort that will be utilized to disseminate information on the AZPSBN effort and gather feedback and input on the development of the network. Our SIGB is comprised of public safety representatives from local, county, state and Tribal agencies representing both rural and urban communities. Disciplines represented on the PSCC include law enforcement, fire, homeland security, EMS, emergency management, and technology.

In addition, we plan to leverage our Emergency Managers within each County to disseminate information along with coordinated outreach efforts working with the Digital Arizona Program to involve more than just Public Safety interests. In addition, we are working with our statewide Public Safety Access Points (PSAPs) and dispatch centers to validate our agency contact information within CASM. This information will be used for direct email information and invitations to County-wide meetings. Finally, our existing Public Safety Interoperable Communications (PSIC) Office has a website which includes information on the AZPSBN effort.

d. How should the States plan to involve the tribal entities in the grant program?

As with other stakeholder groups, States should utilize established mechanisms, governing bodies, processes and procedures for public safety whenever possible. States should plan on interacting with their tribal entities in the manner they have done so in the past. States may also consider leveraging the Office of Emergency Communications (OEC) Regional Coordination Program to work in collaboration with the Regional Tribal Representatives.

*In Arizona, we plan to work directly with our Tribal and Indian Community contacts as well as work with Indian Country Intelligence Network (ICIN) (*http://itcaonline.com/?page_id=857*).*

e. What requirements should be included in the grant program to ensure that local and tribal public safety entities are able to participate in the planning process?

As there are a number of workable avenues for communicating State, local and tribal entities establishing uniform requirements may be difficult. It would be beneficial if NTIA were to setup a web-based repository for the outreach efforts being provided by each State, then the repository could not only assure the NTIA that each State is on track with its unique program but the repository could serve to provide all States with a view into "best practices" which may be useful for their State. In addition, if preliminary

design plans were likewise shared then opportunities for cross-border sharing of resources may become evident.

f. How should the State and Local Implementation grant program ensure that all public safety disciplines (*e.g.*, police, sheriffs, fire, and EMS) have input into the State consultation process?

In addition, to the above recommendations for other stakeholder groups, assure that all agencies are represented and up-to-date in CASM (or equivalent) and contact them directly. If CASM is not the preferred contact repository then substitute whatever is currently in use.

g. How should the State and Local Implementation grant program define regional (*e.g.*, interstate or intrastate) and how might the grant program be structured to facilitate regional participation through the States?

While keeping under consideration that it is FirstNet's call on the overall design of the backbone, it seems reasonable to plan for both interstate regions in the same configuration as the FEMA Regions (I through X) and to also plan for intrastate regions for States with an unwieldy number of counties like Texas. Furthermore, some States may want to organize based on their Homeland Security Regional Advisory Councils (RACs), FEMA Emergency Managers or Local Emergency Planning Committees (LEPCs) or PSAPs.

However, since the grant is for planning the implementation of a single Statewide network for public safety, Arizona recommends States be given the flexibility to subaward grant funds to a single agency and not be required to split the grant funds among intrastate regions, local, state, or tribal jurisdictions.

h. How should States plan to involve the Federal users and entities located within their States in the grant program?

Most States already have worked through the need for Federal agencies to communicate with State and local jurisdictions. Those existing contact points should be documented and factored into the overall design. In addition, there are known interactions which are necessary but problematic or even non-existent; these should also be documented and possibly resolved through the NPSBN. Finally, there are State, local and tribal interactions which are in place between transportation, utility and other industries, which are locally unique and also need to be documented and resolved.

For Arizona, the Department of Public Safety and particularly Arizona's Counter Terrorism Information Center (ACTIC) program are a good starting point for the inclusion of Federal users/agencies within Arizona. The Yuma Regional Communications System (YRCS) and the Southwest Border Communications Working Group (SWBCWG) also include Federal participants and would cover Border Patrol among others. Several of the State's Regional Wireless Systems have arrangements with their locally stationed Federal partners.

3. The Act contemplates that FirstNet will consult with States regarding existing infrastructure within their boundaries, tower placements, and network coverage, which FirstNet can use to develop the requests for proposals called for by the Act. The States, however, will need time and funding to collect the necessary information before they are ready to consult with FirstNet.

a. Given these interrelated activities, how should the State and Local Implementation grant program be used by States to assist in gathering the information to consult with FirstNet?

b. Should consistent standards and processes be used by all States to gather this information? If so, how should those policies and standards be established? What should those policies and standards be?

c. What time period should NTIA consider for States to perform activities allowed under the grant program as it relates to gathering the information to consult with FirstNet?

It would be reasonable for NTIA to enlist the assistance of the OEC or NPSTC to gather input from a group of State-level oriented Public Safety representatives with a history of establishing state-wide programs, projects, policies, standards and procedures along with some LTE SMEs to help establish the generic templates for the types of assets that would be beneficial for the NPSBN build-out. This list should not be considered to be the be-all, end-all for assets. States should be encouraged to be creative in their thinking, for instance, State or locally controlled rights of way, although not hardware, are very valuable in the overall scheme of things.

Furthermore, these asset lists should not be considered to be a minimum requirement or hurdle for States to be able to join in. If the level of sharable assets result in tangible reduced costs of the NPSBN services provided to the State, then the prospect of reducing costs should provide the necessary incentives. If FirstNet takes the approach that sharing means that FirstNet "owns" the infrastructure, then it will reduce the number of entities that would be willing to share. Regarding the amount of time it will

take to inventory the viable assets, if adequate resources are made available to the States through adequate funding then 1 year would be reasonable. If left to existing resources then 1 to 3 years may be the norm.

Existing Public Safety Governance and Planning Authorities
4. Over the years, States have invested resources to conduct planning and to create governance structures around interoperable communications focused primarily on Land Mobile Radio (LMR) voice communications, including the Statewide Interoperability Coordinators (SWIC) and Statewide Interoperability Governing Bodies (SIGB), often called Statewide Interoperability Executive Committees (SIEC).

a. What is the current role of these existing governance structures in the planning and development of wireless public safety broadband networks?
b. What actions have the States' governance structures (*e.g.*, SWIC, SIGB, or SIEC) taken to begin planning for the implementation of the nationwide public safety broadband network?
c. Can these existing governance structures be used for the PSBN, and if so, how might they need to change or evolve to handle issues associated with broadband access through the Long Term Evolution (LTE) technology platform?
d. What is or should be the role of the Statewide Communications Interoperability Plans (SCIPs) in a State's planning efforts for the nationwide public safety broadband network?
e. What actions do the States need to take to update the SCIPs to include broadband?
f. Should the costs to change or evolve existing governance and Statewide Plans be eligible in the new program?
g. Should the maintenance of those existing governance bodies and plans be eligible in State and Local Implementation grant program?

The existing Public Safety Governance and Planning organizations with their policy, standards and process development functions already in place should be leveraged without the need to introduce additional or temporary organizations. If State's have not followed the recommended creation and support of the SIGB, SWIC and SCIP approach then they should be encouraged to do so without fail. The relationships these organizations have with State, Local and Tribal public safety agencies will be invaluable in the successful design, build and long term support of the NPSBN.

The States should plan on altering the SCIP to take into consideration the upcoming NPSBN implementation. Some States started this process during last year's SCIP update and many more are already in the process of updating their SCIPS during this year's annual process to include changes to the initiatives associated with the

appropriate SAFECOM continuum categories for their State's plan. It would be appropriate for the SLIGP program to fund State's planning to update their SCIPs, as well as those who have already completed the SCIP update process, for the resources which are required to respond to the NPSBN changes.

Leveraging Existing Infrastructure

How should States and local jurisdictions best leverage their existing infrastructure assets and resources for use and integration with the nationwide public safety broadband network?

a. How should States and local jurisdictions plan to use and/or determine the suitability of their existing infrastructure and equipment for integration into the public safety broadband network?

b. What technical resources do States have available to assist with deployment of the nationwide public safety broadband network?

c. How will States include utilities or other interested third parties in their planning activities?

d. Should NTIA encourage planning for the formation and use of public/private partnerships in the deployment of the nationwide public safety broadband network? If so, how?

The States should use every possible option to work with FirstNet to offset the costs of building and maintaining their portion of the NPSBN RAN. This includes State, Local and Tribal hardware, right of way and Public/Private partnerships (including partnerships with utilities and private concerns). The "how" will be dependent on FirstNet overall design direction, each State's selective RAN approach and their individual legal and regulatory position. We don't believe the NTIA should weigh in on what is appropriate in this process.

6. Section 6206(b)(1)(B) of the Act directs FirstNet to issue open, transparent, and competitive requests for proposals (RFPs) to private sector entities for the purposes of building, operating, and maintaining the network. How can Federal, State, tribal, and local infrastructure get incorporated into this model?

a. How would States plan for this integration?

b. Should States serve as clearinghouses or one-stop shops where entities bidding to build and operate portions of the FirstNet network can obtain access to resources such as towers and backhaul networks? If so, what would be involved in setting up such clearinghouses?

c. Should setting up a clearinghouse be an eligible cost of the grant program?

The focus should not be on the relationship between FirstNet and the private sector entities as described in 6206(b)(1))(B) at the time of submitting RFPs, but rather the relationship between FirstNet and Federal, State, Local and Tribal Public Safety entities, et. al. described in 6206(b)(1) where these entities will work "in consultation" to build, deploy and operate the NPSBN. The fact that FirstNet will possibly issue open, transparent, and competitive requests for proposals to private sector entities for the purposes of building, operating, and maintaining the network is relatively inconsequential once the requirements contained in those RFPs have been agreed to by all parties. Again, the critical point here is that the agreement on the RAN is between FirstNet and the State and that the contractual relationship between any private sector entities supplying build services is with FirstNet.

Regarding question 6.b, this question may need more clarification as to intent - this line of reasoning seems to imply a potpourri style of build-out where multiple vendors provide build-out services in a piecemeal fashion. This does not seem to be an optimal approach. Firstly, as stated in the previous paragraph, it is FirstNet's responsibility to interact with vendors after the requirements are agreed upon for Opt-in States, but whether or not it were FirstNet or the State managing the build-out (under the Opt-in or Opt-out option) it would be preferable to have one set of vendors (here the term "set' signifies a small number of vendors distinguished by specialty – conduit/fiber trenchers, tower builders, LTE installers, etc.) working under a general contractor and performing the build-out for a given State to leverage uniform program management, resources sharing criteria, standardized progress and performance metrics for the build out and consistent testing and validation criteria – not to mention "one neck"

State and Local Implementation Grant Activities
7. What are some of the best practices, if any, from existing telecommunications or public safety grant programs that NTIA should consider adopting for the State and Local Implementation grant program?

The NTIA should consider taking into consideration the cooperative and supportive approach fostered by DHS and the OEC, as these organizations have shown a solid understanding of how to establish enduring and cooperative relationships.

8. What type of activities should be allowable under the State and Local Implementation grant program?

All activities directly related to providing the best possible services to Public Safety in a customer oriented approach. (See response to 1.b above)

9. What types of costs should be eligible for funding under the State and Local Implementation grant program (*e.g.*, personnel, planning meetings, development/upgrades of plans, or assessments)?

All of those categories should be included. Additionally the grant should specifically allow 5% of grant funds to be used for Management and Administration (M&A) by the SAA administering the grant, and an additional 5% M&A for the sub-awarded agency implementing the grant (state or local subaward). Since this is a grant specifically for planning the build-out of a statewide public safety network, it is likely that the grant program will be implemented by a single statewide agency. There should not be restricting language limiting the state to retain no more than 5% for M&A funds.

a. Should data gathering on current broadband and mobile data infrastructure be considered an allowable cost?

Yes.

b. Should the State and Local Implementation grant program fund any new positions at the State, local, or tribal level that may be needed to support the work to plan for the nationwide public safety broadband network? If so, what, if any, restrictions should NTIA consider placing on the scope of hiring and the type of positions that may be funded under the grant program?

Yes on funding new positions.

10. What factors should NTIA consider in prioritizing grants for activities that ensure coverage in rural as well as urban areas?

Each State should provide equal emphasis on both urban and rural coverage especially when it comes to the SLIGP funds. If it becomes obvious that the overall budget won't provide total coverage during build out planning - a proportionate reduction in funds should factor in both population and geographical footprint.

In addition, to coverage issue, the rural areas are going to particularly sensitive to the value proposition provided by the NPSBN. If the costs are too high relative to the perceived value then the adoption rate will impacted.

11. Are there best practices used in other telecommunications or public safety grant programs to ensure investments in rural areas that could be used in the State and Local Implementation grant program?

States should be encouraged to establish or utilize existing regional advisory groups to provide input into the development of the statewide plan. For example, the current Arizona Department of Homeland Security (AZDOHS) process divides the State into Regional Advisory Councils, which ensures good representation for rural entities. However, due to the need for coordinated Statewide efforts in planning and building out of a single statewide network, the SLIGP should not require grants be subdivided among regions or local jurisdictions.

12. In 2009, NTIA launched the State Broadband Initiative (SBI) grant program to facilitate the integration of broadband and information technology into state and local economies.
a. Do States envision SBI state designated entities participating or assisting this new State and Local Implementation grant program?
b. How can the SBI state designated entities work with States in planning for the nationwide public safety broadband network?

States should use all available resources and knowledge-bases which are appropriate to fulfill the Public Safety mission of the FirstNet Board and the NPSBN which was established under HR3630 bill. If there are residual assets or knowledge from the SBI programs which can be leveraged to assist in delivering the FirstNet/NPSBN mission, then they can and should be leveraged by the States in a consultative role.

13. What outcomes should be achieved by the State and Local Implementation grant program?
a. Are there data that the States and local jurisdictions should deliver to document the outcomes of the grant program?
b. If so, how should they be measured?
c. Who should collect this information and in what format?
d. What data already exist and what new data could be gathered as part of the program?

The CASM program as administered by the OEC should be leveraged and funded by the FirstNet program to provide additional cellular and Broadband data points. As mentioned in section 2e above, it would be extremely beneficial if the NTIA were to set up a web-based repository so that States could post their documentation and progress.

Although, each State's approach might be unique there will be clusters of like-styled States which could benefit from the shared knowledge, validation of the approach and solutions to hurdles we will inevitably encounter.

14. The U.S. Department of Homeland Security's Office of Emergency Communications (OEC) has developed the following tools through its Technical Assistance Program available at http://www.publicsafetytools.info, including:
(1) Mobile Data Usage and Survey Tool – Survey process to document the current-state mobile data environment, in preparation for a migration to LTE;
(2) Statewide Broadband Planning Tool– Template and support on Statewide strategic broadband planning issues designed to serve as an addendum to the SCIP;
(3) Frequency Mapping Tool – Graphical tool to display FCC license information and locations including cellular sites within a jurisdiction; and
(4) Communications Assets Survey and Mapping Tool (CASM) – Data collection and analysis tool for existing land mobile radio assets. Should States be encouraged to utilize tools and support available from Federal programs such as those developed by OEC? Are there other programs or tools that should be considered?

The use of these tools should be encouraged. A user collaboration and document sharing website or portal similar to the Homeland Security Information Network (HSIN) should be created for States to coordinate their efforts both within each State and with other States.

15. Do the States have a preferred methodology for NTIA to use to distribute the grant funds available under the State and Local Implementation grant program?
a. Should NTIA consider allocating the grant funds based on population?
b. What other targeted allocation methods might be appropriate to use?
c. Should NTIA consider phasing the distribution of grant funds in the new program?

Grants should be allocated to States based on risk, threat, and vulnerability (existing formulas) plus geography. As this is a planning grant and needs to be completed prior to FirstNet issuing an RFP to a State, NTIA should NOT consider phasing the distribution of grant funds in the new program. The phasing of funding limits and restricts the procurement process.

State Funding and Performance Requirements
16. What role, if any, should the States' Chief Information Officer (CIO) or Chief Technology Officer (CTO) play in the State and Local Implementation grant program and the required consultations with FirstNet? How will these different positions interact

and work with public safety officials under the State and Local Implementation grant program?

The State CIO or designee should be involved in the State's PSBN efforts early on since this Network will have a lot of internet protocol (IP) and network components which are not normally a big part of LMR communications systems.

17. The Act requires that the Federal share of the cost of activities carried out under the State and Local Implementation grant program not exceed 80 percent and it gives the Assistant Secretary the authority to waive the matching requirement, in whole or in part, if good cause is shown and upon determining that the waiver is in the public interest. As NTIA develops the State and Local Implementation grant program, what are some of the factors it should consider regarding States' ability to secure matching funds?

Arizona requests the match requirement be waived. Requiring States' to budget and appropriate 20% of the cost of the planning activities to be carried out under this grant program will cause a significant delay in the implementation of this grant, the gathering of needed data, the issuance of the FirstNet RFP, and ultimately the build out of the NPSBN.

18. What public interest factors should NTIA consider when weighing whether to grant a waiver of the matching requirement of State and Local Implementation grant program?

The level of inclusion of the full Public Safety stakeholder base, as well as the promotion of resource sharing with FirstNet and the other broadband needs within the State (Education, Health, Transportation, Government, etc.) should be taken into consideration when waiving the 20% requirement. In addition, States will be paying a significant amount in Fees to be able to get on the network and those costs should be considered when deciding whether or not the 20% should be required.

Other

19. Please provide comment on any other issues that NTIA should consider in creating the State and Local Implementation grant program, consistent with the Act's requirements.

Due to the need for a coordinated Statewide effort in the planning and building out of a single statewide network, the SLIGP should not require grants be subdivided among

multiple regions or local jurisdictions. While States should be encouraged to include and involve as many stakeholder groups as possible in the planning process, States should have the flexibility to sub-award to a single agency (state or local) to facilitate a statewide project.

As the build-out of the NPSBN is primarily to support public safety, the administration of the grant should go through existing public safety structures and the Homeland Security SAA, leverage existing committees whenever possible, and only create new entities when they do not already exist.

To ensure coordinated planning and promote interoperability, all grant awards should be recommended or coordinated through the SWIC align with the SCIP.