

**United States Department of Commerce  
National Telecommunications and Information Administration**

Regarding the:	)	Docket: 120509050-1050-01
	)	
Development of the State and Local	)	
Implementation Grant Program for the	)	
Nationwide Public Safety Broadband Network	)	
	)	
Request for Information	)	

**Comments from the State of Colorado Governor’s Office of  
Information Technology (“OIT”)**

**I. Introduction**

The State of Colorado Governor’s Office of Information Technology (“OIT”) is pleased to submit our comments regarding the implementation of the State and Local Implementation Grant Program (“Program”) as outlined in the Request for Information (“RFI”) posted in the Federal Register Vol. 77, No. 95/Wednesday May 16, 2012. We appreciate the opportunity to provide feedback to this important program and look forward to working with the NTIA.

Please note that additional comments were filed separately by Kristin Russell, the CIO for the State of Colorado. These comments addressed questions 2 and 16. Please reference those comments for additional information.

**II. Comments**

**Question 1: Consultation with FirstNet**

**OIT Response**

OIT believes the collection of relevant data should be a primary goal of the planning process as the efficient utilization of local resources will be critical to the success of the Public Safety Broadband Network (“PSBN”). We believe the following are some of the crucial data that should be collected.

- Available Towers
  - Location, AGL, ownership, current loading, backhaul capability, current use, hardening
- Existing Fiber Infrastructure
  - Location, ownership, capacity, current use
- Existing Microwave Infrastructure
  - Location, capacity, frequency
- Potential network users
  - First Responders (Fire, Law enforcement, EMS)
  - Secondary Responders (Public Works, Transportation, utilities, etc.)
- Potential Grade of Service frameworks based on the specific population, roadway and travel patterns within the state (e.g., urban, rural, suburban, destination centers)

As mentioned, OIT believes these activities are central to the overall goal of the planning grants and therefore should be funded by the Program. These tasks will take significant effort in both human and capital resources. Additionally, OIT believes FirstNet should establish a standard classification mechanism for the assets to provide guidance to local entities on the type and format of information desired.

#### **Question 4: Existing Governance Structures**

##### **OIT Response**

While the current governance structures have been and continue to be critical for existing public safety communication systems, OIT believes a comprehensive review of governance is necessary to ensure success in the development and implementation of the PSBN. The technologies and business model that will be utilized moving forward are vastly different and provide an opportunity to revisit the governance structures in place. The effects of the PSBN will be felt across not just public safety but all public services and therefore require a comprehensive governance solution. The existing SWIC and SIEC models may work well in specific states but just as each state is unique in its service delivery methodology, the appropriate governance structures may differ as well. Additionally, one of the core requirements of the planning process is to engage the local communities and tribes, and performing this review will provide an excellent opportunity to

engage these communities. In addition to the aforementioned organizations, Colorado has developed a variety of regionalized efforts including:

- **All Hazard Regions:** These groups are designed to bring together regionalized public safety interests throughout the state to plan and coordinate activities such as emergency preparedness, DHS grants and other first responder activities.
- **Local Technology Planning Teams:** This effort is focused on local communities and bringing together the public and private interests within those communities to address broadband technology needs.

OIT believes that using all of these resources to engage communities throughout the state will allow us to identify the proper governance structure for the PSBN within Colorado.

Regarding the Statewide Communications Interoperability Plan (“SCIP”), OIT believes the PSBN should be integrated into the plan as it will become a primary communications medium for both day-to-day and incident based first responder communications. We believe any costs associated with modifying the document should be allowable under the Program.

#### **Question 5: Leveraging Existing Infrastructure**

##### **OIT Response**

As mentioned, OIT believes leveraging existing infrastructure will be crucial to the success of the PSBN. In Colorado, as in many states, the state, counties, municipalities and tribes will separately own these assets. Once identified, significant effort will be required to coordinate and organize the assets so they may be made available to FirstNet. OIT believes the Program should cover the costs for determining how these assets are made available. With a variety of local and state laws regarding ownership, usage and revenue generation, Colorado will have to work with all stakeholders to ensure there is consistency in how these assets are made available.

In determining suitability, OIT believes FirstNet will need to establish some standards for the desired assets based on potential usage and specific architecture. As one of the states with early LTE implementation (Adams County Communications Center), Colorado has developed an understanding of the LTE technology and already begun work on creating the collaborations necessary to plan the statewide network. Colorado possesses a number of

technical personnel both at the state and local level that understand the technology requirements and can help develop a solid plan for network development. Possessing these resources will be beneficial as Colorado can assist FirstNet in determining the suitability of specific infrastructure for the NSPBN. OIT believes the process for determining suitability will be a collaborative process not only within a state, but also between the states and FirstNet.

In the rural sections of Colorado, local utility cooperatives play a key role in infrastructure. Through some of the previously mentioned outreach structures, Colorado has already begun the process of engaging rural utility cooperatives in regards to broadband infrastructure. Many of these utilities are working with BTOP, RUS and other federal programs to make infrastructure available to those who have a need. For example, local cooperatives have allowed fiber-optic cable to be placed on their existing infrastructure and/or provided access to existing fiber. OIT feels these established relationships will be valuable in determining the overall inventory within the state of Colorado.

OIT believes the potential for public-private partnerships is great within the PSBN and would welcome the opportunity to explore such options; however, OIT believes the structure and implementation of these partnerships should be left up to the states and their local entities to develop.

#### **Question 6: Integration of Resources into the RFP Process**

##### **OIT Response**

The mechanism utilized for access to its assets will be unique to each state. Local, state or tribal laws may prohibit or directly specify certain methods. OIT believes the NTIA should allow funding for Colorado to develop a methodology and structure for this process. We believe the NTIA should publish general specifications/goals for the interaction between RFP respondents and states in order to allow states to develop the best structure that works within their laws and environments. We understand and agree that a single “clearinghouse” would be the most efficient model, however, the specific interests and rights (legal, financial, etc.) of the asset owner must be maintained and integrated into any contract.

## **Questions 8 and 9: Allowable Expenses**

### **OIT Response**

OIT believes a broad range of expenses and activities that are specifically tied to the identified goals of the Program should be allowed. These may include, but are not limited to:

- Developing a statewide inventory of assets
- Creating necessary governance and clearinghouse structures
- Financial analysis of asset values and future costs
- General LTE training
- Personnel costs (new and existing)
- Travel (mileage, lodging, meals)
- Hardware and software related to the process (Inventory software, computers, GPS devices, etc)
- Collaboration/coordination costs (meetings/events/education)
- Data gathering or procurement of necessary data sets
- Contractors that perform tasks associated with the planning activities

## **Question 12: SBI Related Activities**

### **OIT Response**

It is critical for the States' SBI designated entities to be included in this Program. These entities have been developing information on broadband availability and, in some cases, available broadband infrastructure. They have developed the capacity and organizational network to expand the information gathering to the necessary elements, many of which are identified in our response to Question 1, for planning for the PSBN. Some issues may arise, however, that will warrant specific attention or action from the NTIA.

- In states where the SBI designated entity is not a state entity, the integration of the SBI data may be more difficult. Some of the contractual arrangements between these third party entities and states do not provide the necessary transparency into the mapping process or access to the raw mapping data. If possible, within the confines of state contractual rules, the NTIA should require third party designated entities to share necessary data with states for the FirstNet

implementation planning. The designated entities for this planning should be an entity within state government. In Colorado, we deliberately structured our broadband data and development program to allow for this transparency and transfer of data, and we subsequently moved the program entirely to internal state staff, so we are well positioned to integrate with the implementation planning.

- Much of the information required for the FirstNet implementation planning relates to infrastructure. This information has been difficult to obtain from broadband service providers and can even be difficult to collect from other state agencies at times. The reason for the latter issue often relates to independent funding sources from federal agencies that promote single use within the specific state government agency. The NTIA can assist by working with federal agencies to ease previous requirements for single use and/or requiring future grants to share information for this purpose.

Respectfully submitted,

Governor's Office of Information Technology  
State of Colorado