



County of Fairfax, Virginia

**Response to National Telecommunications and Information Administration
Request for Input on Development of the State and Local Implementation
Grant Program for the Nationwide Public Safety Broadband Network
Docket No. 120509050-1050-01**

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Final

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Table of Contents

1. Introduction	3
2. Fairfax County, Virginia Comments	3
3. Conclusion.....	9



1. Introduction

Fairfax County is the largest jurisdiction by population in the Commonwealth of Virginia, with 1,037,605 citizens living within its 407 square miles. Public Safety (PS) services are provided by 7 local law enforcement agencies, the Fairfax County Fire Department and numerous state and federal agencies. Interoperable communications in this region is both challenging and critical. Fairfax County is part of the National Capital Region (NCR) which includes 19 other local jurisdictions that routinely rely on operational mutual aid which has made communications interoperability a reality. This interoperability will be strengthened through the allocation of the public safety 700 MHz broadband spectrum. Now that the D block will be available to public safety, public agencies and first responders have the opportunity to seamlessly access a secure, reliable, interoperable, public safety grade, broadband wireless network, without risk of service interruption due to a lack of prioritization and/or network overload once implemented.

Fairfax County, VA long identified public safety interoperable broadband services as a priority, and in fact, was approved earlier as part of a NCR-wide Waiver. On June 28, 2010, Fairfax County, VA filed a waiver to continue efforts to deploy a network as quickly as possible in the 700 MHz public safety broadband spectrum. In March 2012, the County also applied for a Special Temporary Authority (STA) to leverage the D-Block spectrum and deploy a pilot 700 MHz Public Safety network. The County's private fiber enterprise network is part of the county's overall communications infrastructure supporting the broadband network, and will meet the technical specifications the FCC has proposed, while being architected to easily integrate into any future interoperable nationwide public safety broadband network.

The County of Fairfax, Virginia is pleased to provide the following comments to National Telecommunications and Information Administration's Request for Input on Development of the State and Local Implementation Grant Program for the Nationwide Public Safety Broadband Network Docket No. 120509050-1050-01.

We look forward to working with the federal government through a strong partnership to implement the best possible nationwide network plan.

2. Fairfax County, Virginia Comments

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?



Keeping in mind that the majority of users of the nationwide network are at the local level, the States should, in advance of the planning grants, establish intrastate governance between the state and local jurisdictions. The wireless network will be a resource that will require a dynamic prioritization from local to state governments, and possibly to federal responders. The network usage governance should be worked out in advance. Once agreed upon, it is critical that each state develop a balanced local grant distribution plan, and collect information from the local governments in a uniform and electronic format.

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

The States should have the flexibility to choose who is in that role. However, we recommend that the state's Chief Information Officer or SIEC chair be assigned as the point of contact for implementing the grant funds given the highly technical nature and requirements that are instrumental to the process. This would provide for a deep understanding of all the requisite system lifecycle tasks that would be instrumental in plans, implementation and compliance. NTIA should not look for the same person in each state to fill this role, this should be left up to each individual state; but rather ensure that the needed functions / responsibilities of this role are included in the position of whomever each individual state chooses. The state should pro-actively leverage the SIEC, and any other similar bodies that have the local governance as a part of its structure, as well as have local government representation on the group(s), since the majority of first responders are within the local governments, and the majority of future communication systems, as well as existing communication systems that can be leveraged for our nationwide build out are assets of and managed by the local governments. There is a need for a formal partnership between state and local governments, and the NTIA should ensure that all participate and have a role in the decision making process that the state is coordinating. There should be a requirement for the states to disperse the funds to the locals based on the size of population in an area, and the input from each organization and each entity within the state should be incorporated into the state plan.

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. 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?

It's very important that the data entry for all the states be done electronically and that the information is populated into a database that allows the state and local jurisdictions to see, in real time, the data and information that is missing and the ability for that data to be edited, so that it can be updated on an ongoing basis. The database format should be centrally developed so that it is comprehensive throughout the entire country so that the FirstNet board has the ability to



collect all data for the network, and also have access to data being provided by an individual state, local, or tribal jurisdiction, and that the state and local jurisdictions can have access to its information. The easiest way to establish and enforce these standards is to have an online database system that allows for singular input into the process. By accomplishing this goal, it's ensured that FirstNet is receiving a consistent format of information from entity to entity. It's also important for NTIA to send out instructions to state and local jurisdictions in preparation of the grant release. We believe that 120 days from the release of the grant is a sufficient time for all to submit the required information.

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). What is the current role of these existing governance structures in the planning and development of wireless public safety broadband networks?

The existing governance structures for interoperable communications may be modified for providing guidance for wireless public safety broadband networks, so that there is an overall view of the interoperable communications capabilities, and as relevant technology evolves. State and Local jurisdictions have worked diligently to secure funding, acquire resources, and form public/private partnerships to build networks, and have a wealth of direct knowledge and experience in managing and operating LMR systems and experience in developing and in some cases implementing wireless broadband networks. Any halt in current and future build-outs would be a detriment to the common goal of achieving a nationwide interoperable broadband network. We believe that costs to evolve all existing governance and statewide plans are eligible costs in the new program.

5. 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?

It's important that the FirstNet Board provide guidelines as it relates to the requirements, so that the state and local jurisdictions have the ability to utilize the assessments of the current infrastructure needed to support broadband, and be able to guide its evolution to the LTE standard. The state and local governments are responsible for maintaining a vast network throughout our country. The individuals that put these networks together have a tremendous amount of intellectual capital that is reusable for designing, managing, zoning, planning, testing, and operating networks within our states and local governments. In addition local governments can leverage existing local owned and operated communications infrastructures as part of the design for the public safety broadband network. With the standards established by the FirstNet Board, any local deployment would be interoperable with the other local/state networks, resulting in the nation-wide public safety network as envisioned. States should reach out to their local utilities organizations, and ask each to provide relevant information as it is related to the infrastructure necessary to support 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 be incorporated into this model?

The state and local governments should be fully leveraged in the build out of the nationwide network. RFPs should include information related to all the local assets and intellectual capital available to the effort, also with knowledge of deployments in process. It should be noted that state and local governments have mandated processes for procurement of goods and services that require **open, transparent, and competitive processes, and that the private sector entities are accustomed to this practice and its requirements.** A final contract should allow for the implementation phase of the build out that is managed by the local and state jurisdictions and they should receive grants to assist in the build out in their respective areas. The states have existing procurement policies that have to be respected, and it our belief that the states and locals should leverage these procurement processes. The states should serve as a clearinghouse that can facilitate many partnership opportunities.

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?

NTIA should leverage the Homeland Security grants, the UASI grants, and other federal grant models as well and the state grant processes as a baseline. For a more efficient and effective outcome, pointless redundant information collection and administrative requirements should and can be avoided, which would make this a very efficient and simple process for state and local jurisdictions to apply for, receive funding, and accomplish implementation.

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

Allowable duties should include but are not limited to grant oversight, collection of data at the state and local levels. Ongoing governance, planning and managing efforts throughout the network planning and deployment stage should also be allowable.

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)?

Staff necessary to perform all duties for grant oversight, collection of data at the state and local levels as well as ongoing governance, planning, engineering and managing efforts throughout the network planning and deployment stage should be allowable.

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



The factors should center on the following prioritizations:

- 1) Reliable and highly available service in high threat areas
- 2) Building capacity in Urban areas
- 3) Rural areas that have the highest threat but fewest communications options
- 4) Availability of experience and contribution of necessary assets

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. Do States envision SBI state designated entities participating or assisting this new State and Local Implementation grant program? How can the SBI state designated entities work with States in planning for the nationwide public safety broadband network?

The SBI program may be expanded to include the **public safety broadband network, which would also boost local and state economies while accomplishing the specific needs of the public safety broadband network.** Those entities that have been set up should be leveraged; however the established state SIEC along with the state and local IT departments and First responder organizations should be the lead organizations that leverage the state broadband committees to participate in that process.

13. What outcomes should be achieved by the State and Local Implementation grant program?

The outcome of this process is a single, up-dateable electronic source or database that allows for FirstNet, States and local officials to have the following information viewable at the national, state and local level:

- 1) Existing infrastructure and what it would take to make the infrastructure LTE ready
- 2) The number of users and anticipated number of users as well as planned usage
- 3) Current PS broadband OpEx costs
- 4) Device requirements
- 5) Governance plans per state
- 6) Planned User priorities

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?

The desired method is to leverage the existing state, homeland security, and emergency communication grant awardees. There needs to be clear guidelines on how to distribute grant dollars throughout local jurisdictions to insure their participation and that accurate information is being received from them. These grant funds were specifically applied for, secured and approved by the National Telecommunication and Information Agency (NTIA) because of the respondents' ability to leverage existing infrastructure to build-out a Public Safety Network in the 700 MHz spectrum. Demand is a key factor, but providing communications where we can save lives is paramount. We believe that there exists a twofold priority – to build capacity in high populated areas and coverage in rural areas with little communications..



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 overall program should be flexible enough to allow the state and the local jurisdictions the ability to decide who would lead. In all cases the state and local IT department, CIOs, CTOs and first responder organizations should be involved in that process from its development to deployment and through operations and maintenance. Since the effort is highly technical. The optimal structure would have leadership with the State CIO or CTO in partnership with the first responder and CIO stakeholder organizations. The overall goal for the stakeholders is the same, with the first responder organizations having a measurable capability requirement, and with the CIO organizations working to ensure that the design and build-out are technically viable and sustainable

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?

The 20% match should be waived for all state and local planning grants. FirstNet needs State and local participation to achieve our collective goals. Based on the desired outcome listed above, states and locals need to provide the information requested and if additional money is needed to provide the information; the state and/or local government should then contribute to the completion of work. It should be noted however, that the ultimate value of the required time and experience contribution of the participating entities would likely be in-line accomplishing a 100% outcome.

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 primary public interest factor is that the people of our nation are getting a comprehensive wireless network for that gives public safety a solid communications infrastructure to perform the duties expected of the public throughout the entire country. It is the single most important public safety communication network endeavor that will be taken on in our life time, and long overdue as evidenced time and time again, since 9-11, and more frequent disasters

Additional information that FirstNet and NTIA should consider:

It continues to be our belief that the national network architecture should include the ability for state and local regions to band together and provide state/local owned cores as a part of the



FirstNet Core infrastructure under the following conditions. The state/local core be a part of the FirstNet core infrastructure, and the State/local is operated by whatever entity that FirstNet selects to operate the FirstNet federal core resources, and that the state/local core be fully redundant with the FirstNet core and vice versa. In addition, the State/Local Governments will accept all network upgrades approved by the FirstNet board without exception. We believe that this architectural approach will add additional needed resiliency to the nationwide network while reducing federal investment. This approach will also ensure that a higher percentage of states and local jurisdictions would opt in vs. opting out of a nationwide network.

3. Conclusion

It is essential that citizens nationwide who are protected by the Public Safety community can feel secure in the knowledge that first responders will be able to immediately respond to emergencies, catastrophic or man-made events by using a dependable, reliable, and effective communications network, thus if current implementations by state and local public safety agencies continue, the goal for the nationwide network would be far more cost effective and timely. The distinct need for a private public safety broadband wireless network for Fairfax County, Virginia and for all interdependent jurisdictions contained therein is essential and fundamental. The transition to a public safety grade LTE network is both timely and necessary. The dedicated public safety network will enable Fairfax County to provide broadband communications services to over 99 percent of the County's population, to all critical infrastructure facilities and to all roads that extend into the remote areas to and from these critical infrastructure and high population center locations.

The County of Fairfax, Virginia would again like to acknowledge the importance of the State and Local jurisdictions being fully leveraged in the planning and build phases of the nationwide network plan, and that build grants should be provided to state and local governments to fully leverage their intellectual capital, individuals with direct familiarity with tower locations, zoning, planning capabilities, program managers, and the host of other talented resources that make up our State and Local Governments. In short, we are better together and we will achieve far more if we fully leverage all available and qualified government resources.

Lastly, early deployments serve a valuable purpose and every effort should be made to support and encourage continuing early deployment efforts on the part of state and local governments. There is much we can learn, adopt and avoid through early network use and these networks can be integrated into the nationwide network in the future.

The County of Fairfax, Virginia plans to continue to work with other waiver jurisdictions, neighboring jurisdictions in mutual aid, pending waiver jurisdictions, the NTIA, FCC, NCR, The Commonwealth of Virginia, First Net Board, and the Federal Government to achieve the goal of a fully interoperable 700 MHz Nationwide Public Safety Network.