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Department of Commerce

National Telecommunications and Information Administration (NTIA)

Request For Information (RFI): Development of the State and Local Implementation Grant Program for the Nationwide Public Safety Broadband Network

FEMA Region 5 Regional Emergency Communications Coordination Working Group (RECCWG)

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The responses provided in this document were developed in a collaborative approach by RECCWG members participating in a Public Safety Broadband committee as established by the FEMA region 5 RECCWG. These committee members are representatives of the states within FEMA region 5. Those states in FEMA region 5 are: Illinois, Indiana, Michigan, Minnesota, Ohio, and Wisconsin.

Responses for the NTIA RFI on the State and Local Implementation Grant Program for the Nationwide Public Safety Broadband Network

Description: The National Telecommunications and Information Administration (NTIA) issued 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.

Described below are selected questions from the RFI and proposed responses.

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?

Response:
- Most first responders and government users of the National Public Safety Broadband Network (NPSBN) are local – village, township, city, county, and other local jurisdictions. Moreover, a majority of the potential government-owned infrastructure that may be leveraged for use in the NPSBN are deployed by cities, counties, states, and other like jurisdictions.
- Therefore, in using these grant funds, states must place the highest priority on establishing or enhancing governance structures that ensure adequate representation of local jurisdictions in their respective states. Such governance structures should be established for use in all phases of FirstNet's responsibilities to ensure the design, construction and operation of the NPSBN as described above. The governance structures that states should already have in place or are working to develop based on the Department of Homeland Security's Office of Emergency Communications (OEC) guidelines for State Interoperable Governance Boards (SIGB). These governance models should include representatives of first responders from the local and state level and also elected officials (such as state legislators), public safety communications professionals, leaders responsible for statewide public safety communications systems, 911 Directors, emergency management directors, state and local IT leadership focused on public safety, public works/transportation/utilities and other local and tribal responders and infrastructure owners.
- To streamline information gathering and decision-making, the governance structures can include a smaller "decision-making" executive committee or board, and larger advisory panels or boards that report to the executive committee. The executive committee should be empowered to act on behalf of the governor, and focus the direction for the entire state.
- State governance structures should seek to find synergies and opportunities with adjoining states to achieve common goals or efficiencies. Regional governance structures that represent multiple states may prove valuable. Borrowing on the success of FEMA Regional Communications Committee Working Groups (RECCWG), and other such pre-established partnerships and governance structures that stretch to multiple states and organized regions.
- As one specific deliverable from the grants, states should clearly document their governance

structure, its charter and enabling documents, and describe how the state will use that structure to work with FirstNet. This governance structure shall also be empowered by the governor to make the interoperable decisions for the state, and be a focused strategic group to continue all efforts for long term strategic approaches to include items such as land mobile radio interoperability, Next Generation 911 approaches and other yet unknown focused areas of interoperability for the states.

- As a source of technical assistance in establishing governance structures, states should take advantage of existing models, and guidance services offered by the Office of Emergency Communications (OEC) of the Department of Homeland Security (DHS).
- States need to conduct a comprehensive user needs assessment. Without a detailed understanding of the types and distribution of devices on applications that will operate on their networks, they will not have a very good understanding of anticipated network traffic. Accordingly, they will not much useful technical data to provide to Firstnet. Assessments should include user surveys and interviews including *current, planned, and ideal* applications on their wireless data networks. Table-top exercises for mock incidents should follow, including data inputs from surveys and interviews. Finally, traffic models should be built according to the inputs from data collections and exercises to fully assess data needs of responders within each state.
- States should conduct a full assessment of their existing infrastructure, including but not limited to: site locations, tower loading, shelters and backhaul to build in inventory of available sites. The assessment should identify all sites that require remediation or update and the approximate costs to bring those sites up to spec.
- States should conduct a full assessment of feasible Greenfield sites, including available backhaul (such as county/municipal-owned fiber or carrier-owned facilities), feasibility of lands acquisitions, regulatory/environmental restrictions, etc.
- States should identify where additional infrastructure is needed based on gaps identified by user distribution and traffic needs as identified in the user needs assessments, gaps in their existing infrastructure, and feasibility of Greenfield sites.
- State plans should incorporate a variety of strategies to generate the engagement and attention Public Safety Broadband will require to move it forward, under any plan.

Suggest the following Steps:
- Gather representative information on the above 7 areas listed (construction of a core; placement of towers; coverage; hardening, security, reliability & resiliency; priority of users local; priority of users when roaming; and training) from existing wide area Land Mobile Radio and Data networks;
- Assess the adequacy of the data gathered as it relates to a Public safety LTE network via in-state peer review;
- List any gaps based on the assessment;
- Re gather information for gaps identified or Develop general statements to cover the gaps identified;
- Peer review the gap coverage data developed;
- And synthesize and summarize the data gathered and the data developed by the 7 areas identified above in question one i through vii.

Policies around Radio Sites, Towers, and shelters. Policies covering Fiber and microwave backhaul. Public/private partnerships and sharing. State capability to maintain and manage a network.

- Power generation and generator backup.
- Seismic events (New Madrid Seismic Zone)
- Site security and standards.
- Data on Existing levels Data on problems encountered buy carriers, construction co, etc.
- Use existing data for Trunked Networks and Data Networks
- What entities are using state trunked radio LMPR, Metro LMR, Cellular Data networks?
- Data compiled for all local data, wide are data, local radio, wide area radio (trunked and conventional)

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?

Response:
- This is a decision best left to states – it will vary for each state. Each state's point of contact will be the same body/official that will have the responsibility as the coordinator. This individual should also have a reporting relationship to the committee/board/commission as identified in the state governance model as identified above. State's should be required to identify the relationship/role the chosen body/official relates to the state identified governance structure if there is not a direct reporting relationship to that body. There will need to be synergy between the executive committee of the committee/board/commission and the identified body/official to ensure the direction of the executive committee matches that of the body/official with the responsibility of the grant funds.
- The "single officer" should be nominated by the SIGB, as the SIGB is best-positioned to choose that representative which best meets the needs of all public safety stakeholders in the state.
- The CEO of the SAA. The State Agency that administered the 2007 Public Safety Interoperable Communications (PSIC) Grant Program or the head of that agency. This agency would be familiar with the grant requirements of the US Dept. of Commerce.

2b. Who might serve on the governmental body (*e.g.,* public partners, private partners, technical experts, Chief Information Officers, SWIC, finance officials, or legal experts)?

Response:
- The governance structures that states should already have in place or are working to develop based on the Department of Homeland Security's Office of Emergency Communications (OEC) guidelines for State Interoperable Governance Boards (SIGB). These governance models should include representatives of first responders from the local and state level and also elected officials (such as state legislators), public safety communications professionals, leaders responsible for statewide public safety communications systems, state/statewide/enterprise and local IT service leadership (Chief Information Officers), 911 Directors, emergency management directors, state and local IT leadership focused on public safety, public works/transportation/utilities and other local and tribal responders and infrastructure owners.
- Governance for interoperable data should be under the SIGB, or the SIGB should be the governing body for interoperable data on its own. The fundamental goal of communications interoperability, which is to enable responders and public safety officials to share information as needed and authorized and without substantial barriers to doing so, does not change based on the underlying technology. Accordingly, there is no need to establish a *new* governance structure, even though there is now a new technology to govern. The governance body should include Multi-discipline, multi-jurisdiction agencies invested in communications- i.e. Emergency Management, State Police, Dept. of Transportation, Dept. of Corrections, other state agencies, the agency in charge of state billing, private sector communications partners, and private sector partners participating in disaster response, state Chief Information Office, Office of the Governor, SWIC, local government agencies, state mutual aid organizations, various subject matter experts, and others as determined by the SAA, SWIC or Chair of the SIEC/SIGB.

2c. How should the States plan to involve the local entities in the State and Local Implementation grant program?

Response:
- States have the involvement or should be engaged with the locals via existing state interoperable governance boards or state interoperable executive committees. These models are best utilized as the focused approach of this "new" interoperability direction should already fall under their respective charters or taskings for interoperability. Sub-committees for the existing state interoperable governance structures will the involvement by tasking the leaders at the local and

state levels that are engaged in the new direction to develop the strategy for the entire state with buy-in at the executive committee. Another suggestion would be to have the chair or vice-chair of the committees as a local entity to ensure that equal participation across all levels of government.

- Local entities should have representation on the governance board. Each state's governance board can prioritize the use of funding in rolling out the state's plan for their broadband network. The Governance Board causes sub grants be issued to local entities to be applied to their costs in satisfying the requirements of the grant program. Another suggestion would be to have the chair or vice-chair of the committees from a local entity to ensure that equal participation across all levels of government.

2d. How should the States plan to involve the tribal entities in the grant program?

Response:
- Same type of inclusion as in 2b and 2c, tribal representation should already be included in the state interoperable governance boards and if they are not, a requirement for the states will need to be identification how they will engage their tribal partners during the entire process. Such an example may be to amend the current governance structure to include a tribal entity representing the entire tribal community within the state, and require such a seat in order to meet the grant criteria guidance.

2e. 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?

Response:
- Much as the same as in 2d, require state interoperable governance structures to be made of equal parts local as state, and the lead for the tribal governments in the respective state. Without equal makeup, including legislative leaders, developing the state's overall plan will not be inclusive if the requirements are inadequate or the policy makers for the state are not aware of the growing opportunity for public safety, and secondary user entities for the network.

2f. 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?

Response:
- The most effective approach will be for the states are to utilize existing governance structures for interoperability as they should include all of the necessary representatives across the multiple disciplines of public safety. The governance structures that states should already have in place or are working to develop based on the Department of Homeland Security's Office of Emergency Communications (OEC) guidelines for State Interoperable Governance Boards (SIGB). These governance models should include representatives of first responders from the local and state level and also elected officials (such as state legislators), public safety communications professionals, leaders responsible for statewide public safety communications systems, 911 Directors, emergency management directors, state and local IT leadership focused on public safety, public works/transportation/utilities and other local and tribal responders and infrastructure owners. Another possible requirement of the NTIA grant requirement may be to provide a copy of the state's interoperable governance structure highlighting each of the expected disciplines that will need to be represented.
- The final decision in the process should belong to the State.

2g. 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?

Response:
- In determining their governance structures, States should be encouraged to recognize (a) any existing UASI region inside their state or adjacent to it and (b) any existing regional organization which provides public safety communications services, e.g. a communications district providing a 700 MHz or 800 MHz regional trunked public safety network.
- In addition, each State should be encouraged to facilitate possible public/private partnerships with organizations that provide services on a regional and/or multi-state basis.
- States should be encouraged to consult with surrounding States and share information regarding their governance and deployment plans.
- States may already have structured participation as identified previously with FEMA RECCWG functions, or regional/multi-state partnerships with statewide communications interoperability. In our state, Michigan has had ongoing collaboration with bordering states of Ohio, Indiana, and Wisconsin with the statewide communications system leaders and also with statewide interoperability coordinators.
- Minnesota through its SIGB has engaged in interoperable communications projects with the states of Iowa, Wisconsin, North Dakota, South Dakota, and the provinces of Ontario and Manitoba. Minnesota sees no special benefit to establishing new mechanisms, other than those through its SIGB which have been successful to this point, to encourage regional participation in the NTIA grant program.

2h. How should States plan to involve the Federal users and entities located within their States in the grant program?

Response:
- Typically, State and local government agencies already have established relationships with Federal users, e.g. state emergency managers with the FEMA region, local law enforcement and fusion centers, or joint anti-terrorism task forces. States with statewide public safety communications systems have also established user relationships in sharing interoperable communications to promote interoperability with their peer public safety entities within the respective states. These successful existing interoperability models will be the basis of continued partnerships with the federal partners. States should leverage these existing relationships to draw Federal users and entities into their governance structures, and use the grant funds to demonstrate how those relationships will be leveraged. Additionally, Federal agencies that interact with State and local first responders should be encouraged to communicate their interests in utilizing the NPSBN to the State's governance organization.
- Federal entities should be invited to sit on each SIGB, as Federal public safety entities are legitimate interoperability stakeholders. Federal entities should be involved in broadband planning through their membership in the SIGB, which in turn should coordinate the NTIA's grant program within the states.
- Additionally, Federal agencies that interact with State and local first responders should be encouraged to communicate their interests in utilizing the NPSBN to the State's governance organization. All Federal agencies and entities as part of their implementation should be prepared to interoperate with any local and state agency (50 State plans, 6 territory plans, a single tribal plan which may be included in a given states plan, and a single Federal agency 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?

Response:

- As the legislation calls for, FirstNet must leverage publicly and privately owned infrastructure (microwave backhaul, fiber networks, radio sites, towers, buildings, etc.) to implement the NPSBN. States should use the grant funds to establish structures and mechanisms to collect as much infrastructure-specific data as possible. States should use existing tools such as Communications Assets Survey and Mapping (CASM) tool to continue to collect data on all available state and local radio communications sites/structures. Or states could establish subcommittees of the statewide governing entity specifically to work with the major local governments and agencies who own infrastructure, in order to simplify FirstNet's ability to leverage this data in its negotiations to seek public/private partnerships to implement the NPSBN.
- Guidelines or benchmarking of the value of local assets should be provided by the States (or FirstNet) in order to provide a base value for determination of the "investment" which will be made by each local, regional, or state first responder community.
- Minnesota has conducted a comprehensive user needs assessment which required approximately one full year to complete. A full assessment of its infrastructure has not yet been completed at this time. Based on prior art established by Minnesota, other states may complete their data collection in a shorter period of time. Accordingly, Minnesota recommends at least one full year to assess existing infrastructure and network requirements within each state.

3a. 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?

Response:

- In order to streamline the process of gathering this important information, consistent standards or processes will be essential to collect the bulk of the data. Models should be researched from tools already developed or used by federal and state agencies, and organizations such as APCO International, National Public Safety Telecommunications Council (NPSTC) to gather and hold this information. Additional tools should be purchased or developed only when no existing tool can be used. Such existing tools would be like that of the CASM tool identified previously. NTIA/FirstNet will be expected to deliver to all of the states the published standards and processes and strictly enforce that each state follow them specifically. If enforcement isn't in place the difficulty will be on FirstNet for evaluation and will only alienate the states in the entire process of consistency is not in place. As a follow-on suggestion as many online tools as possible to collect state data should be in place, this will enforce the consistency while also ensuring the overall efficiency in reporting by the states and subsequent follow-up by FirstNet.

3c. 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?

Response:

- Time is of the essence. The timeframe for reporting of the information should be approximately six months after NTIA issues grant criteria. States can supplement responses as necessary thereafter in an online tool. But FirstNet needs to process the information as soon as possible so that it may timely develop network policies and requests for proposals.
- Minnesota recommends at least one full year to collect data, based on its experience collecting data for broadband planning.

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).

Response:

- SWIC's and related interoperable governance committees/boards are currently the logical and most knowledgeable organizations for moving the PSBN forward. They understand operability and interoperability issues better than any other group. Their input cannot be understated. These existing governance structures could be expanded to incorporate "regional" membership and PS BB.

4a. What is the current role of these existing governance structures in the planning and development of wireless public safety broadband networks?

Response:

- These previously established governance structures and roles will be key for the states to approach the new interoperability focus of NPSBN. The existing boards are already engaged in the information, and tactical approach to the state's strategy. In Michigan's case, the SIGB has already identified new interoperable communications as a function of the role of the committee and an enhanced SIGB is in process of replacing a model that did not include all appropriate leaders across the state from the respective organizations. Other leaders such as those focused on statewide public safety communications are traditionally leading these efforts in many states as they too share the role of the statewide interoperability coordinators (SWIC). States should leverage any existing governance structures, supplemented or modified as appropriate, to account for the national governance structure created by the legislation (FirstNet).
- Existing IGBs generally have, as their stated purpose, the basic goal of enabling first responders to communicate with one another. Even though the underlying technology is fundamentally different for the NPSBN compared to the technologies IGBs have historically dealt with (principally Land Mobile Radio [LMR]), the mission is not much different at all. Accordingly, existing IGBs should continue to have principle responsibility for interoperability within the NPSBN just as they have historically for land mobile radio.

4b. What actions have the State's governance structures (e.g. SWIC, SIGB or SIEC) taken to begin planning for the implementation of the nationwide public safety broadband network?

Response:

- States have been looking at the changes in interoperability long before the law was signed this past February. As early as the dialog was focused on just the reallocation of the D Block forced states to understand what this type of new network would do for interoperability and even expanded the SWIC into two individuals, one focused on traditional voice technologies and one focused on the PSBN and the relationship to next gen 911. Unfortunately, DHS OEC only recognizes a single SWIC for each state, but should expand this recognition as the amount of technology change is too dramatic for most to handle with existing staff. An example that we used was a primary SWIC and an alternate SWIC thus allowing the state to effectively approach the demands driven by DHS for existing interoperability and the new demands of understanding/educating/planning for the interoperability to come.
- Minnesota has found it prudent to establish a new committee of subject matter experts for the express purpose of broadband planning, but its new Interoperable Data Committee nonetheless still reports to the Statewide Radio Board, whose responsibility to ensure interoperable communications in Minnesota is not compromised. Additionally Minnesota has:
  - Established a new Interoperable Data Committee under its Statewide Radio Board (recognized by Executive Order of the Governor as the Statewide Interoperability Executive Committee [SIEC]) that is chartered to be the primary entity for public safety

broadband planning in Minnesota.
- Completed a comprehensive broadband planning study through 2011-2012.
- Evaluated at various phases, over the past several years, different approaches for realizing public safety broadband within Minnesota, including a wireless data feasibility report in 2009 and a Wireless Data Development RFI in 2009-2010.
- Aggressively participated in the NPSBN regulatory and legal activities, such as participating in FCC rulemaking activity and filing comments, as needed, with the Commission.
- Participated in larger national planning efforts through professional organizations such as NPTSC and NENA.
- Held dozens of sessions on public safety broadband at various meetings and conferences throughout the state, either specifically for its broadband study or for general education's sake.
- Updated Statewide Communications interoperability Plan (SCIP) to include public safety broadband planning initiatives.

- Determine through the Governor's office the State agency and governance group that will be responsible for PSBN in Illinois. Currently the SWIC is leading the planning and research as it relates to PSBN. Unfortunately, DHS OEC only recognizes a single SWIC for each state, but should expand this recognition as the amount of technology change is too dramatic for most to handle with existing staff. An example is the SWIC leading a team of deputy SWICs and other staff as appropriate thus allowing the state to effectively approach the demands driven by DHS for existing interoperability and the new demands of understanding/educating/planning for the interoperability to come.

4c. Can these existing governance structures be used for PSBN, and if so how might they need to change or evolve to handle issues associated with broadband access through LTE technology platform?

Response:
- Yes, expansion to include the new entities that the traditional SIGB may have missed when the guidelines were established while also allowing the states to strategically look to consolidation of boards/commissions where the future directions will bring those traditional silos together. As an example PSBN and NextGen 911 will be convergent networks, so why should states/locals/etc. continue to keep the silos, when they realistically should be combined. Participation with the vendor community will be important to meet the goals of PSBN, but the belief can be that the vendor partners will participate with the boards/commissions but until they have a distinct role, they made not be voting members.

4d. 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?

Response:
- Once the PSBN is in place the SCIPs should be updated to reflect the additional interoperability capabilities of the new network. To add any structure or data within the SCIPs without the network in place would be speculation and intent of the technology's viability. As states begin to rollout Radio Access Networks to facilitate the network within the states, not only should the state focus on the new capabilities (video, data, non-mission critical voice) viable within the state, but should also target specific updates to include all neighboring states to ensure true interoperability between states and the region.
- The SCIP is a comprehensive outline of the strategic direction for public safety communication efforts, the basic mission of which does not change when the technology does. Gaps in each state's SCIP as they apply to NPSBN planning should emerge over the course of executing statewide broadband assessments. As such, a detailed user needs assessment is a pre-requisite to updating each SCIP. As a preliminary move, states should identify critical planning needs for the NPSBN, and include strategies to meet those needs in their SCIPs. Once those planning needs

are addressed, or are close to becoming addressed, IGBs should be better-informed to establish specific day-to-day interoperability priorities that may in turn be included in the updated SCIP.
- Once Illinois defines Strategic Goals and objectives for PSBN in the Statewide Communications Interoperability Plan (SCIP) it will be the single source document for high level strategy. A broadband plan will be created to address the specific elements and decisions that need to be considered for the PSBN.

4e. What actions do the states need to take to update the SCIPs to include broadband?

Response:
- Again, it may be premature to update the SCIPs based on what is known today of the PSBN, but as more is known and the roles between the locals/states/other states/feds/private and FirstNet is firmly established, the existing governance structures should be leveraged to strategically identify the new sections in the SCIPs and the pertinence and relationship to existing interoperability strategies in the states/regions.
- However, per above, states should identify critical planning needs for the NPSBN, and include strategies to meet those needs in their SCIPs.
- We first need to completely understand what the PSBN will look like. Then include the strategic goals and objective information in the SCIP. Then create the state broadband plan.

4f. Should the costs to change or evolve existing governance and Statewide Plans be eligible in the new program?

Response:
- Yes, unless the NTIA grant program duplicates grants available from DHS or other sources. These efforts could also be identified as inkind contributions as a focal point of the 20% match by the states.

4g. Should the maintenance of those existing governance bodies and plans be eligible in State and Local Implementation grant program?

Response:
- Support activities should be included in the State and local implementation grant program, but should be within reason and the staff dedicated to these specific efforts for the states during the planning process. Too many times, states rely on the funds to fund long term positions/staff only to run into the dilemma of funding expiration and the duties left to fall on staff unprepared to take up the duties. It should not be encouraged that staffing be obtained to take on the activities, but appropriate resources in place be leveraged to support the activities of the governance structures and related plans.
- A functioning governance structure is a critical pre-requisite to NPSBN planning; without an effective governance structure, it is not likely that there will be productive outputs for any other NPSBN planning investments. The NTIA's grant program should support maintenance of governance structures where there is a demonstrated need.
- As identified in 4f, areas of effort that the states will expend in creating and updating affected areas currently in existence should also be identified as eligible for inkind contributions to be used as a function of the 20% state match towards the grant.

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?

Response:
- The user needs assessment and infrastructure assessment should reveal the best strategies in each state to leverage their existing resources for the NPSBN.
- Additionally, See response to question 3.

5a. 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?

Response:
- In the limited time that states will have to collect information on available infrastructure, FirstNet should standardize the collection of basic data on state and local infrastructure as an initial indication of suitability for incorporation into the NPSBN. For example, asking whether commercial power is available at the site, whether battery or generator power is available, tower loading and capacity to expand, etc.
- As a general matter, there should be nationwide standards for infrastructure, e.g. hardening of radio communications sites, power and back-up power, space available for additional antennas on the towers and equipment in buildings, tower wind loading and maintenance standards.
- FirstNet could create such standards by leveraging the work and experience of existing organizations, such as APCO and NPSTC. For example, APCO:
  - is an ANSI standards-setting organization, and thus can create ANSI standards to help identify the suitability of existing infrastructure and equipment;
  - is a source of technical assistance to public safety agencies in implementing the CASM tool;
  - has helped 700 & 800 MHz Regional Planning Committees in standardizing frequency usage, loading, and coordination practices on a regional basis;
  - created the first fully automated frequency coordination database and application processing system, which can be customized and developed for use in developing a similar database for the collection of state and local infrastructure information; and
  - developed a web-based engineering tool and prediction software that can be applied to the state and local planning process by applying the latest technical guidelines and propagation modeling.
- Also, the user needs assessment and infrastructure assessment should reveal the best strategies in each state to leverage their existing resources for the NPSBN.

5b. What technical resources do states have available to assist with deployment of the nationwide public safety broadband network?

Response:
- In Michigan's case, the years of experience in developing the people and processes of the statewide land mobile radio system, the staff at the state and local level is knowledgeable in the need for partnerships and integration of subsystems and development of a large scale complex system. The state has resources with the skills and knowledge in public safety communications networks, public fiber networks, and partnerships with private entities that makeup the required environments (wireless carriers, tower companies, and traditional fiber carriers.)
- Minnesota state and local government collectively employ several hundred full-time technical staff devoted to public safety communications, including engineers, technicians, coordinators (such as the SWIC), and technical management staff, including over 100 state government technical staff specifically dedicated to the ARMER network. Much of this personnel has already invested significant training and effort into NPSBN planning and integration.

5c. How will states include utilities or other interested third parties in their planning activities?

Response:
- In Michigan's case, we have had ongoing dialog with a subset of the utilities in Michigan and had cursory meetings to discuss possible approaches to public private partnerships and such was included in the waiver supplied in September 2011. It is necessary for public safety to partner with secondary users such as utilities to ensure economies of scale and use are reached in order to approach a self-funded nationwide network.
- Minnesota is currently investigating formal MOUs with interested private partners and holding meetings. Minnesota has invited potential private partners to sit in **non-voting** seats in its

Interoperable Data Committee and has received several responses.

5d. 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?

Response:
- It is key for NTIA/FirstNet to encourage such partnerships for a nationwide network where fundamentally feasible, but it should not be required criteria to deliver the network in a state or for the nation. 3P opportunities should be sought out by FirstNet on a nationwide approach to ease the States of those localized negations but states should be encouraged to target state and regional businesses where opportunities for partnering make sense and demonstrate a common sense approach without compromising public safety.

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 infrastructures get incorporated into this model?

Response:
- See responses to questions 3 and 5.
- Additionally, FirstNet should defer to IGBs to manage or negotiate RFP processes for their constituencies as much as is practical, as each IGB should represent state, Federal, tribal, and local government entities and all public safety disciplines—with additional perspective specific to their states and regions.
- A national inventory of existing infrastructure

6a. How would states plan for this integration?

Response:
- See responses to questions 3 and 5. Furthermore, FirstNet should share with the states what data was provided in the respective RFP's that would cover the state or regional RFP approaches. The data to be shared relates to the data collected and the partnerships identified. This will be imperative for the states to make appropriate judgment to the needs of public safety and the identified partners in the states.

6b. 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?

Response:
- No, the clearinghouse should be established by critical players from Federal, State and Local government. It should be created, funded, and managed by the Federal Government in an effort to maintain uniformity. Clearinghouses certainly can facilitate public/private partnership opportunities, particularly for smaller entities. Further, utilizing a single model for such a clearinghouse that can be repeated across all states would be most efficient.

6c. Should setting up a clearinghouse be an eligible cost of the grant program?

Response:

- Yes there should be a clearinghouse; but No, as the States should not be required to use this grant money to establish a state-level clearinghouse. NTIA should be responsible for establishing a nationwide clearinghouse into which states can submit data.

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?

Response:
- The Public Safety Interoperable Communications (PSIC) grant program is one that could be modeled with more stringent and defined "products" and applicable services that would be allowable expenses. There should not be vague items leaving interpretation up to the states and locals of what is an allowable expense. An equal efficient reporting approach should also be adopted using successful Homeland Security or Emergency Management grant processes that states can quickly relate to and adopt based on the preexisting knowledge of such reporting aspects. Unless a new highly efficient and repeatable process can be developed, approach this process with a current model that states can easily adopt.

8. What type of activities should be allowable under the state and local implementation grant program?

Response:
- Activities directly related to the planning, development, and delivery of the PSBN. Staffing (contractual and existing governmental staff) will need to be an appropriate expense as government will need to make do with the limited staff they have in place as this new PSBN will focus existing staff in new directions. Costs associated with related administrative expenses as well. The capability of the states to use inkind contributions as they work through these efforts should be a strong consideration of NTIA in order for states to meet the 20 percent match. There are few states across the nation that may have the financial capability for the match that the planning grant and the applicable FirstNet network so wherever possible the states should be allowed and directed to utilize inkind contributions where possible.
- Specific activities include:
  - Preliminary Broadband Studies, targeting issues including the following study areas:
    - User Needs
    - Network Requirements
    - Carrier Capabilities
    - Implementation Model/Overall Design
    - Priority Service Areas
    - Sustainable Funding Strategies
    - Private Partnerships
    - Value of Existing Assets and Human Capital to the NPSBN
    - Network Security
    - User Services/Applications Requirements
    - NG9-1-1 Integration
    - SCIP Compliance
  - Authoring of a Public Safety Broadband Plan
  - Hiring full-time technical and administrative personnel
  - Attending/organizing meetings, workshops, tabletop exercises, and conferences
  - Developing or maintaining SCIPs insofar as they must be updated for the NPSBN
  - Forming and administering Interoperable Governance Boards
  - Strategy and timeline development
  - Governance planning, implementation, conference calls, in person meetings, and staff support
  - Outreach and education efforts
  - Inventory and evaluation of Assets
  - Development of assets database
  - Requirements gathering efforts

- o Coverage planning/mapping
- o Performance measurement and accountability
- o Grant reporting and audits

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)?

Response:
- As mentioned above, it is important to include costs of creating and staffing statewide governance structures.

9a. Should data gathering on current broadband and mobile data infrastructure be considered an allowable cost?

Response:
- Yes and States should acquire or use tools (such as CASM), which become part of the everyday work of a state or local agency, rather than used for a one-time data collection.
- Further, existing tools for broadband infrastructure used by commercial operators that may engage in public/private partnerships to implement the NPSBN should be considered as well.
- Data gathering should be one of the principal costs of this grant program, as it is an extremely labor-intensive effort that requires specific expertise over a short term. These types of services are typically acquired through contract services.

9b. 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?

Response:
- Yes, if additional personnel is necessary after considering existing workforce, such as to gain expertise specific to NPSBN technology.
- The program should support training and education for existing staff to properly equip such staff to participate in NPSBN activity.
- In those cases that there would appear to be an extended or permanent need for any positions initially funded by the NTIA's grant, the NTIA should consider requiring a showing that the position will be funded beyond the performance period of the grant.
- Yes, only if the state does not currently have a full-time SWIC willing to fill this position. While this should be an allowable cost, funding awarded to a state should be increased to fund new positions. Each state should use their grant allocation to fund the position if they feel it is necessary.

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

Response:
- Yes. The legislation requires consideration of coverage in rural areas. Further, planning grants for rural areas can help identify potential local partners that may have infrastructure and other resources that can be leveraged.
- Additionally, the user needs assessment should demonstrate the scope of rural coverage requirements within each state and county so long as the assessment is coordinated through an IGB that has adequate representation from rural areas.
- No factors should be considered. This is a nationwide Public Safety Broadband Network; all grants should ensure full complete coverage of urban, suburban and rural areas.

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?

Response:
- Yes. Best Practice guidelines were developed to ensure AARA funding to rural entities and the Michigan Shared Networks Integration Project (SNIP), which seeks to leverage existing local government/school district fiber infrastructure for cost-savings and network expansion. Existing guidelines and relationships can be leveraged for the State and Local Implementation grant program.

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.

12a. Do States envision SBI state designated entities participating or assisting this new State and Local Implementation grant program?

Response:
- Yes.

12b. How can the SBI state designated entities work with States in planning for the nationwide public safety broadband network?

Response:
- Many cross-boundary (State and local) partnerships currently exist within the Public Safety, GIS, and IT communities. These existing relationships can be further leveraged by the SBI State Entities to provide assistance with strategic planning, outreach communications, and relationship building.
- Additionally, with consideration to the establishment of an NPSBN, SBI state designated entities should be considered for inclusion into each state's IGB.

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

Response:
- The establishment of the critical statewide governance structures identified in response to question 1, and the collection of as much data as possible on each state's particular requirements and infrastructure for inclusion into FirstNet's RFP process.
- After concluding projects funded by the NTIA's grant program, each state should:
    - Fully understand their user needs and expected traffic volumes/patterns over the NPSBN
    - Fully understand the scope and value of existing physical assets and human capital insofar as they may be included into the NPSBN
    - Fully understand the scope of additional investments that will be required to meet their needs with the NPSBN
    - Fully understand the scope and dollar amount for operational funding of the NPSBN within their state
    - Have a preliminary network design for their state
    - Have a fully-functioning governance structure capable of coordinating all NPSBN activities while representing all stakeholders and disciplines within the state
    - Be "shovel-ready" for NPSBN implementation in the state.

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?

Response:
- See response to question 3.
- Yes, User-friendly but robust coverage tools

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?

Response:
- Following the same process that has been in place for existing grant programs through each state SAA. This is a process that is known in each state and repeatable.
- Additionally, all funds distribution should be coordinated according to IGB priorities within each state, or awarded to the IGBs.
- Everyone gets a baseline amount then the additional award amount is determined based on specific factors. See 15a, 15b, and 15c

15a. Should NTIA consider allocating the grant funds based on population?

Response:
- Ideally, NTIA would leverage work done by FEMA, DHS and others to do "all hazards" assessments and allocate the grant funds accordingly.
- Funds distribution should be based on the relative value of proposals. One component of a proposal's value is the population that may ultimately benefit from NPSBN planning activities.
- Not on Population only because population would be disadvantageous to rural jurisdictions.

15b. What other targeted allocation methods might be appropriate to use?
Response:
Based on Risk Factors:
- Strategic targets (Nuclear, dense metropolitan areas, chemical storage, military installations, schools, etc.);
- Natural Disasters (Earthquake, Tornado, Flooding, Hurricane, etc.)
- transportation (roads, rail, rivers, airports);
- utility transport (oil, natural gas, electric);
- based on existing infrastructure as documented in national data repositories (FCC ULS for ASR);
- number of public safety /first response organizations that would use the network;
- aging, obsolete, or near obsolete data systems;
- the amount of existing infrastructure to be inventoried and analyzed.

15c. Should NTIA consider phasing the distribution of grant funds in the new program?

Response:
- NTIA should consider phasing of grant funds to ensure that funding remains after the states provide their information to FirstNet. This way, States will have continued assistance to support their governance bodies and serve as a resource to FirstNet.
- Additionally, states are in many different phases through their planning process. Phases may allow some states to "catch up" and present compelling proposals for a second phase, where they would not be prepared today to present a compelling proposal for a first phase.
- Yes. Grant funds should be phased on successful completion of preliminary activities (governance, plan development, SCIP Update, etc.).

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?

Response:
- The consultation with FirstNet will be dependent on each state's respective lead, in cases that may be the CIO/CTO, in other cases it may be State Public Safety agencies that are also charged with a large picture vision for public safety approaches in each state.
- Traditionally, state and local agencies across the country deploy separate communications networks for public safety and other departments. These investments often are duplicative and costly, and no longer affordable.
- CIOs, like Chief Financial Officers (CFOs), are charged with a global view of how information technologies and networks are used across a single government (e.g. a city) or across governments (all the cities, PSAPs etc. in a county or state).
- Accordingly, NTIA grants should require involvement of the CIO, CFO, or both, in each state alongside the respective leaders that the governor has identified as the appropriate leads for each state, unless the state's CIO is not designated to participate in NPSBN activities. The involvement of any single person—whether CIO or not—should be based on the function of each state's government and local governments, as well as who is represented in its Interoperable Governance Board (IGB).

19. Please provide comment of any other issue that NTIA should consider in creating the state and local implementation grant program, consistent with the act's requirements.

Response:
- The grant performance period needs be long enough to successfully complete the tasks, but not so long that the inventory and analysis needlessly delays the implementation of the network.
- NTIA should consider working with early adopters who are willing to help develop an effective template, process and implementation plan, in the implementation, outreach and education phase. This could help with consistency and potentially reduce overall costs.

- For the $135M Implementation grant, States need a specific definition and guidance form NTIA on how to meet statutory "Rural" requirements, as the Federal Government provides more than a dozen conflicting definitions of "Rural". Failure to provide such guidance may result in inconsistent rural coverage across the nation.