

Development of the State and Local Implementation Grant Program for the
Nationwide Public Safety Broadband Network
Request for Information
State of Maine Responses

Following are the State of Maine responses to the National Telecommunications and Information Administration (NTIA) Docket No: 120509050-1050-01, request for information regarding the Development of the State and Local Implementation grant Program for the Nationwide Public Safety Broadband Network. Responses are the joint effort of the Maine Emergency Management Agency, ConnectME Authority and Office of Information Technology. Inquiries can be directed to:

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The Consultation Process

States will need to define their coverage, capacity and operational requirements for the nationwide public safety broadband network based on input from all public safety disciplines across multiple organizational levels; state, county, municipal, tribal and federal. In addition States will need to compile information on the public safety/service wireless assets, private wireless assets, back haul capacities, fiber infrastructure and other public/private assets that can be levered for the nationwide public safety broadband network. These efforts should also include broadband data collected through the State Broadband Initiative (SBI) grants and other broadband related planning initiatives.

The State and Local Implementation grant program should be utilized for these activities to engage the resources necessary to complete the work. Maine, like many States, does not have the capacity to undertake and complete these activities with existing resources. We recommend that NTIA consider an upfront mobilization grant of \$250,000 to each State to facilitate the development of specific State public safety broadband requirements, organization of a governance structure and collection of the data for the consultation process. The intent of the initial grant is to allow States to quickly access funds to begin this process as soon as possible. Further, consistent standard deliverables and achievable time frames to complete the work and any interim milestones should be articulated by NTIA.

Existing Public Safety Governance and Planning Authorities

A number of public safety and broadband governance authorities are active in Maine and will be levered for the nationwide public safety broadband network. These include but are not limited to:

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- Maine Interoperable Communications Committee (MICC) – Representatives from state, county, local agencies, including law enforcement, fire service, public health (hospitals) and emergency management disciplines. The MICC oversees implementation of the State Communications Interoperability Plan (SCIP) through the Statewide Interoperability Coordinator (SWIC) employed by the Maine Emergency Management Agency (MEMA)
- Statewide Radio Network Board (SRNB) – Representatives from all state agency land mobile radio users and service provider the Office of Information Technology. The SRNB oversees implementation of the State of Maine Communications Network (MSCommNet), a new statewide LMR system under construction and due to be commissioned in 2013.
- ConnectME Authority – Maine’s broadband development agency.

Rather than instituting yet another governance board, Maine envisions forming a Statewide Public Safety Broadband Network group encompassing representatives from the various entities to ensure inclusiveness in the needs assessment, data gathering, planning, construction and operation phase of the nationwide public safety broadband network. The Maine Emergency Management Agency, Office of Information Technology and ConnectME Authority will be responsible for coordinating stakeholders, grant administration, acquiring resources, overseeing work performance and other aspects related to the implementation and construction grants.

Leveraging Existing Infrastructure

To the extent possible, existing public and private infrastructure should be levered for use and integration with the nationwide public safety broadband network. If suitable existing infrastructure components will not be used, States should explain why new construction is required or more feasible. Maine has limited technical resources to assist with the deployment and operation of the nationwide public safety broadband network. It will rely on public/private partnerships to assist with and provide resources for planning, construction, system integration and operation activities. What States can and should do is act as clearing houses for information regarding towers, backhaul and other related assets. Additionally States can assist with the competitive process for provider selection to construct, operate and maintain the system and for ongoing administration of subsequent contracts. This approach helps ensure the maximum integration of the broadband networks with public safety agencies and overall utilization of system capabilities for other purposes. States will need to allocate resources for these activities and the associated costs for these resources should be eligible through grant programs or recovered through a revenue model.

State and Local Implementation Grant Activities

Multi-phased grant programs building on the outcomes of previous phases are a best practice that should be followed for the State and Local Implementation grant program. As stated earlier Maine believes a two phase grant process that recognizes 1) an immediate need to provide assistance to states to effectively consult with FirstNet and

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2) provides for a more thorough implementation planning process based on outcomes of the consultation phase will yield the best result. State and Local Implementations grant program monies need to be available for a variety of activities including but not limited to direct personnel, planning, assessment, third party resource acquisition/costs and grant administration.

Maine will work closely with the SBI designated entity and grant recipient the ConnectME Authority to lever its efforts and provide opportunities to further extend broadband to unserved areas of the state. The existing broadband mapping and inventory capabilities resulting from the SBI grants will be used to support the implementation planning and construction of the nationwide public safety broadband network. Data collected during the assessment activity the planning process can be consolidated with the existing broadband information to provide a more complete view of broadband capabilities and assets.

While Maine anticipates leveraging the expertise and data gathered under the SBI for this new State and Local Implementation grant program, it may be necessary to revisit the non-disclosure requirements that underpin the SBI's data collection, compilation, and reporting requirements (in collaboration with broadband providers) in order to allow that to happen at anything other than an aggregated level. The NTIA funded Maine Broadband Mapping and Inventory Project will significantly contribute to this effort. There will also be participation with rural areas that implemented fiber networks, some funded by NTIA BTOP grants, and some funded from ConnectME Authority grants.

Each state designated entity should be directed to adhere to the goals and objectives of the nationwide public safety broadband network. This will entail, at minimum, the sharing of legal restrictions on data exchange (and working to alleviate those restrictions) and cooperation on the enhancement of existing data collection and reporting activities that might support shared SBI and nationwide public safety broadband network goals and objectives.

States should be encouraged to utilize existing tools and standard reporting requirements where ever possible. Levering these existing products, templates and standards will expedite the data collection process and facilitate data analysis. With a goal of nationwide interoperability it is all the more important that a cohesive approach to data collection, reporting and analysis across the States be encouraged.

Maine believes State and Local Implementation grant program funding should be based on what will actually be needed to build out the nationwide public safety broadband network. Factors such as topography, effective signal propagation and availability of existing assets such as towers need to be considered in the determination of funding levels. A population based allocation of funding will not yield the desired result of rural coverage. Along with the allocation of funding NTIA should develop and communicate clear objectives, milestones and deliverables for the phases. For example, NTIA might consider a minimum population density metric for very remote sparsely populated areas of the country where it is not expected that the network will be available. The

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deliverables for each funding phase should be met before any remaining grant funds are used toward any infrastructure improvements.

State Funding and Performance Requirements

The State Chief Information Officer and Chief Technology Officer will play key roles during the State and Local Implementation grant program as well as the construction and operation phases. The Chief Information Officer will ensure that statewide perspective, private partner opportunities, governance structure and executive support elements are considered and properly aligned. For Maine the Chief Technology Officer is responsible for operation of the existing land mobile radio system serving public safety entities as well as the network infrastructure that may be levered for the nationwide public safety broadband network.

State matching funds are extremely difficult to secure in these tight state budget climates. Even “soft” match is challenging as many of the state resources working on broadband, first responder wireless interoperability and narrowbanding are currently being used to meet the match requirements of other federal grants. NTIA and FirstNet must be aware and prepared to provide a simple waiver process to enable States to access the available funding and accomplish the implementation goals. Without the implementation grant funding, the necessary data collection, consultation and planning would not occur.

Implementation grant funding should go directly to the State grant recipient without any pass through obligations. Forcing sub-grants to county/local levels will only fragment the available funding and result in insufficient funding to a few entities to meet the overall needs. A better approach is to provide sufficient funding at the State level and hold States accountable for assessing and meeting local and county public safety needs; which is an objective of the nationwide public safety broadband network.