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National Telecommunications and
Information Administration
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RFI for Development of the State and Local
Implementation Grant Program for the
Nationwide Public Safety Broadband
Network

Georgia Transmission Corporation (GTC) provides electric transmission services to over four million Georgia citizens and maintains more than 3,000 miles of power lines and 900 substations covering almost 75% of the state. Georgia System Operations Corporation (GSOC) provides sales, marketing, utility asset monitoring and control, contracting, transaction, billing and other services for 39 of Georgia's 42 electric membership corporations (EMCs). EMCs play an important part of the Georgia economy, employing 4,700 people and paying more than \$70 million in state taxes.

GTC/GSOC and our member EMCs serve leadership roles in communities throughout Georgia and we have a vested interest in public safety, emergency response, and broadband in order to promote community and economic development. Many EMCs have been involved – directly and indirectly – in bringing high-speed communications services to rural America. Some cooperatives are broadband service providers while others provide access to infrastructure and excess capacity on their networks so that third parties can provide these services.

We commend NTIA for its vision and leadership with FirstNet and its open RFI for the State and Local Implementation Grant Program. We believe there are three primary roles we can play to assist FirstNet and submit these comments for consideration for Development of the State and Local Implementation Grant Program for the Nationwide Public Safety Broadband Network.

EMCs Have the Experience to Assist in Network Planning

Sustainability Planning: EMCs were originally created to achieve the goal of providing electric service in rural, high-cost areas throughout America. While many doubted that rural electrification was feasible, with the help of USDA and local and regional collaboration, we demonstrated that electricity could be sustainably provided to all and now power the lives of roughly half of all Georgians.

Financial Management: Despite operating in these rural, high-cost service areas, EMC members pay lower power rates than the national average. We have adopted a long term investment perspective that is essential for the challenging economics of rural, high-cost infrastructure.

Integration: To accomplish the difficult task of electrifying rural America, EMCs had to develop innovative working relationships with private and public sector partners including investor owned utilities and governmental agencies. Today we share an integrated transmission and generation systems across these diverse groups.

Standards: GTC/GSOC and our member EMCs adhere to federal standards in technology and business processes standards to streamline the delivery of services - from power generation to transmission to distribution - and aid in the coordination of emergency response. These standards allow any EMC nationwide to maintain or repair the infrastructure of any other EMC.

Organizational Structure: EMCs use a non-profit, member owned cooperative structure to respond directly to the needs of the community and to deliver the most cost-effective services possible;

Cooperation: EMCs employ a unique and effective approach to emergency management and disaster recovery planning. As cooperatives, we subscribe to the sixth cooperative principle "cooperation among cooperatives," and maintain a set of mutual assistance agreements that allow for the rapid deployment of support staff and equipment to emergency and recovery zones. We work closely with other first responders, state and local government and Federal and State emergency management agencies to ensure an effective and coordinated response in the event of an emergency.

EMCs Have the Resources to Aid Network Deployment

Fiber Assets: EMCs have deployed fiber in regions of Georgia where others have not been able to, including rural west Georgia, north Georgia, and south Georgia. North Georgia Network (NGN), a cooperative formed by two EMCs and local economic development authorities, became one of the first organizations to be awarded a grant through the NTIA's BTOP program, receiving over \$33 million towards a \$42 million project budget. NGN's EMC partners contributed the bulk of the matching funds and gathered State investment as well. The NGN project is on-budget and on-scope and will be one of the first Critical Community Infrastructure projects to close out.

Work Force: Georgia EMCs employ hundreds of linemen and utilize a significant amount of contractors to maintain our infrastructure. We welcome the opportunity to utilize a portion of these assets to construct a nationwide public safety network.

Project Management: Georgia is a rapidly growing state and relies on a single transmission power grid for all of its needs. In this decade GTC will invest over \$1B in transmission technology to meet Georgia's growing needs. We complete hundreds of construction projects each year. At any given time we have a dozen or more new power lines under construction. We work throughout the state already and are accustomed to projects of this magnitude.

Right of Way: EMCs have extensive rights of way throughout the state that may be of value to FirstNet. While specifics vary, transmission lines generally have 25 to 42.5 feet on roadside lines and 100 to 150 feet on cross-country lines.

Outreach: Since 2004, GTC has hosted thousands of people at over 100 community public meetings throughout the state. Our land agents work diligently with landowners and almost always reach mutually agreeable solutions. In only 4% of acquisitions do we utilize the power of eminent domain.

EMCs Have the Capability to Support Network Operations

Public/Private Partnership: GSOC has partnered with the Department of Energy (DOE) on a \$12 million project focused on improving the reliability, security, interoperability, and efficiency of its component of Georgia's electric grid, while reducing environmental impacts and promoting economic growth. We are 90% complete with this project, which required a 50% (\$6 million) local match commitment. This program

demonstrates our commitment to enhancing critical infrastructure, our willingness to collaborate and co-invest with partners, and our experience working with federal agencies to achieve common goals.

Collaborative Network Management: GTC/GSOC and our member EMCs own and continuously operate an extensive network with public and private sector partners. We believe this model will be directly applicable to FirstNet.

IP Centric: Like Public Safety's coming IP transformation, GTC/GSOC and our member EMCs are becoming increasingly IP centric as well. From meter reading to substation controls to load balancing to field crew operations, advanced telecommunications technologies – both wired and wireless – enable us to deliver reliable and affordable power safely. The role of IP in our networks, and our associated investment, is already substantial and is certain to increase over time. GTC and GSOC are currently developing a strategic path for our future connectivity to prepare for Georgia's growing energy needs. Key to this path/plan is the integration of our 39 member EMC's and their (fiber) infrastructure.

Secondary Users: GTC/GSOC and our member EMCs use every relevant technology available today to work efficiently and quickly. We look forward to learning more about the potential to be secondary users in any capacity on FirstNet.

We look forward to the chance to engage with the FirstNet Authority and Georgia's Planning and Implementation Team to discuss the possibilities for the State and the role that we can play in leveraging this opportunity to improve Georgia's telecommunications infrastructure in the most efficient and productive manner possible.

Sincerely,



Michael Smith
President and CEO
Georgia Transmission Corporation



Gregory S. Ford
President and CEO
Georgia System Operation Corporation