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The Honorable Lawrence Strickling
Assistant Secretary for Communications and Information Administration
Administrator, National Telecommunications and Information Administration
U.S. Department of Commerce
Washington, DC 20230

Dear Secretary Strickling:

On behalf of the National Governors Association (NGA), thank you for the opportunity to comment on various issues relating to the State and Local Implementation Grant Program that will be established pursuant to the Middle Class Tax Relief and Job Creation Act of 2012.

The nation's governors strongly support the establishment of the public safety broadband network and look forward to the opportunity to work with the National Telecommunications and Information Administration (NTIA) and the First Responder Network Authority (FirstNet) to ensure the network's success.

In response to the NTIA's Request for Information, NGA solicited feedback from governors' offices on several items of particular interest and importance to states. The following is a summary of the feedback NGA received.

Federal, State and Local Coordination

1. Who would be the best person or persons to serve as coordinator or on a governing body responsible for grant funds within the state?

Response: *There should be a single person or entity responsible for the coordination of grant funds within a state. The State and Local Implementation grant program should provide states with the flexibility to determine who should serve in that role (i.e., Statewide Interoperability Coordinator, State Administrative Agent, Chief Information Officer, existing board or commission, or other chief officer of the state).*

2. What mechanisms should be put into place to ensure adequate involvement by local and tribal public safety entities? How should states coordinate with any federal users or entities within their borders?

Response: *States have established a number of committees, commissions, working groups and task forces to coordinate with local and tribal governments on a variety of issues impacting public safety. For instance, states coordinate public safety communications issues through Statewide Interoperability Governing Bodies (SIGBs) or State Interoperability Executive Committees (SIECs). SIGBs and SIECs are comprised of representatives of state, local, tribal and federal governments, local law enforcement agencies, other first*

responders, and private sector partners. The State and Local Implementation grant program should encourage states to leverage pre-existing relationships to ensure coordination between all levels of government and public safety entities. The grant program should also permit states with large Native American populations to utilize Native non-profit organizations to facilitate outreach to and coordination with tribal governments.

3. How might the grant program be structured to facilitate regional participation by the states?

Response: *The State and Local Implementation grant program and any accompanying guidance should encourage but not require regional collaboration among states, especially smaller states or states with limited resources. The grant program should allow and support the ability of a group of states to “opt-out” of network construction as a region.*

4. What policies and standards should be established to ensure coordination among federal and state entities with regard to existing infrastructure, tower placement, network coverage, etc.? Should these standards be used for all states? How much time should states be given to gather the information?

Response: *NTIA and FirstNet should develop common policies and standards with regard to all aspects of the public safety broadband network, including but not limited to common GIS databases, tower specifications, backhaul systems and capacities, and network coverage/gaps. Policies and standards should be applied to all states; however, states should be provided with the flexibility to expand on them in order to accommodate state and local needs. States should be given 1-2 years to gather this information and coordinate with federal entities.*

Existing Public Safety Governance

1. What is the current role of existing governance structures in the planning and development of public safety broadband networks? What actions has the state taken to begin the implementation of a nationwide public safety broadband network?

Response: *Many of the existing SIGBs or SIECs in states have begun developing or have developed public safety broadband plans within their states. These groups have begun consulting and coordinating with federal entities to plan and prepare for the implementation of the nationwide public safety broadband network.*

2. What is or should be the role of Statewide Communications Interoperability Plans (SCIPs) in planning efforts for the nationwide network? What actions, if any, need to be taken to update SCIPs to include broadband?

Response: *SCIPs were required to be developed by states with input from multi-disciplinary, multi-jurisdictional public safety entities and are updated annually with guidance from the federal government. SCIPs include a basic understanding of public safety needs and are essential for the planning of a nationwide public safety broadband network. As states update SCIPs, the federal government should support state efforts to include implementation of the broadband network.*

3. Should the costs of updates to or maintenance of existing governing bodies and SCIPs be eligible under the new State and Local Implementation grant program?

Response: *All costs of developing governing bodies and SCIPs, or updating and maintaining existing governance bodies and SCIPs, should be considered an eligible cost under the State and Local Implementation grant program.*

State and Local Implementation Grant Activities

1. 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 should be used as a model. PSIC grants helped support Statewide Interoperability Coordinators (SWICs) and support staffs identify goals and objectives for interoperable communications. Best practices identified from the PSIC grant program include, but are not limited to, personnel and planning costs, consistency in grant guidance and requirements, flexibility in match funds (including the use of soft funds and waivers). The benefit of the PSIC model is that all levels of government are familiar with the grant model and relationships have been successfully established.*

2. What types of costs should be eligible for funding under the State and Local Implementation grant program (i.e., personnel, planning meetings, development/upgrades of plans, or assessments)?

Response: *Allowable costs under the State and Local Implementation grant program should include personnel, all planning activities (including travel costs), infrastructure data collection, SCIP development/maintenance and any other costs related to information gathering and assessments.*

Again, thank you for the opportunity to provide feedback on this important issue. If you have any questions, please contact Heather Hogsett, Director of Homeland Security and Public Safety, Office of Federal Relations, at hhogsett@nga.org or (202) 624-5360 or Thomas MacLellan, Director of the Homeland Security and Public Safety Division, NGA Center for Best Practices, at tmaclellan@nga.org or (202) 624-5427.

Sincerely,



Dan Crippen
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