

June 15, 2012

National Telecommunications and Information Administration  
U.S. Department of Commerce  
HCHB Room 4812  
1401 Constitution Avenue NW.  
Washington, DC 20230

Comments from public safety and broadband organizations in Mendocino County, California, upon NTIA Request for Information on Development of the State and Local Implementation Grant Program for the Nationwide Public Safety Broadband Network (FirstNet)

[Docket No: 120509050-1050-01]  
RIN 0660-XC001

Submitted on behalf of:

Mendocino County Operational Area Public Safety Communications Committee  
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and the:

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by:

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RFI Question 3a) Information on broadband coverage in rural areas of California is not accurate, as has been reported to the California Public Utilities Commission (CPUC) by the Broadband Alliance of Mendocino County (BAMC). The reason for this is due to the fact that broadband coverage data is provided to CPUC by broadband providers, who are not currently held sufficiently accountable for the accuracy of the information they submit to CPUC. California provides this same inaccurate information to NTIA, so both the state and federal agencies responsible for overseeing broadband deployment are not working with data that correctly depicts the actual degree of broadband coverage (and the lack thereof in rural areas).

This problem must be corrected through an in-the-field broadband coverage verification process. Local organizations like BAMC could assist with data verification through a standardized means established at the state or national level. Some of the FirstNet State and Local Implementation grant program funding should be devoted to ensuring that broadband coverage data is accurate through a field verification process.

RFI Question 5) When considering how to leverage existing infrastructure for use and integration with FirstNet, it is necessary to address the problems faced by those areas where no infrastructure exists at all. In many areas of Mendocino County, California, there are no wireline nor wireless network resources. For example, California Highway 20 connects the communities of Willits and Fort Bragg through a 35 mile rural, largely forested stretch of roadway where no wireless connectivity exists. Thousands of travelers utilize this roadway on a daily basis and traffic collisions routinely occur. However, since there is no cell service along most of this portion of Highway 20, citizens are unable to report accidents and other emergencies in a timely manner. In some cases, motorists must travel lengthy distances to report a traffic collision. Meanwhile, the victims of such collisions back at the accident scene may have suffered life-threatening injuries which emergency personnel should be responding to promptly. But until they are notified of the incident, emergency personnel cannot even begin their journey to the scene. This example demonstrates the importance of deploying a public safety network in unserved areas which provides access for the general public as well to public safety agencies.

RFI Question 5d) NTIA should definitely encourage planning for the formation of public/private partnerships in the deployment of FirstNet. An example of how such partnerships would benefit FirstNet can be found in Mendocino County, California, where a large portion of the county is under the control of large, private timberland owners. These landowners routinely cooperate with local public safety agencies in law enforcement and fire suppression activities. Due to the mountainous terrain in our county, it will be necessary to secure the involvement of these landowners to deploy sufficient broadband coverage. FirstNet can leverage the existing cooperative relationship between public safety and private landowners to streamline deployment of the network in regions like ours.

RFI Question 9a) Data gathering on current broadband and mobile data infrastructure should be an allowable cost under the First Net State and Local Implementation Grant program. See our answer to question 3a for details.

RFI Question 10) Urban and suburban areas are already well-served with broadband deployment by the private sector due to the profitability of providing services to concentrated populations. Rural areas have been routinely neglected because broadband deployment costs are higher on a per-customer basis in areas with sparse populations. Some of these areas, such as Mendocino County, California, have significant public safety risks, such as tsunami exposure, terrorist wildland fire threat, and major crimes criminal activity in illegal drug production. FirstNet must prioritize capital project grant funding to rural areas for broadband deployment to overcome the economic disincentives faced by private broadband providers in such areas.

RFI Question 13) One key outcome for the First Net State and Local Implementation Grant program must be to ensure that the network is sufficiently deployed in rural areas so that local public safety agencies and the public at large are able to utilize the network in a manner comparable to their urban and suburban counterparts. At the present time, the disparity in existing broadband deployment between densely populated and sparsely populated regions is vast, which significantly restricts the ability of rural public safety to leverage network resources in large areas of their jurisdiction. In addition, as we have noted in our response to question 5, the general public also needs access to network resources in currently unserved areas to support the public's need to notify public safety of emergencies as well as to achieve broader goals for broadband deployment which have already been established at the national and state levels. As our responses to questions 3a and 9a indicate, it will be necessary to ensure that rural broadband coverage data is accurate through a field verification process.

RFI Question 15b) As mentioned previously, particularly in our response to question 10, FirstNet must prioritize capital project grant funding to rural areas for broadband deployment to overcome the economic disincentives faced by private broadband providers in such areas.

RFI Question 17) NTIA should waive or reduce the State and Local Implementation Grant matching requirement in rural areas which have not been served by private broadband providers due to the economic disincentives of deploying network facilities in sparsely populated areas and the higher capital expenditure requirements on a per-customer basis. FirstNet must help rural areas overcome these barriers to network deployment.