



June 15, 2012

The Honorable Lawrence Strickling
Assistant Secretary for Communications and Information Administration
Administrator, National Telecommunications and Information Administration
U.S. Department of Commerce
1401 Constitution Avenue NW
Washington, DC 20230

RE: NTIA Docket Number 120509050–1050–01

Dear Secretary Strickling:

On behalf of the National Association of State Chief Information Officers (NASCIO), we are writing to submit comments in response to NTIA's Request for Information on Development of the State and Local Implementation Grant Program for the Nationwide Public Safety Broadband Network (PSBN). NASCIO represents the state chief information officers and information technology executives and managers from the states, territories, and the District of Columbia. Thank you for the opportunity to comment on various issues relating to the implementation of the State and Local Implementation Grant Program.

In response to the NTIA's RFI, NASCIO solicited feedback from the state CIOs, reviewed responses to the RFI made available to us by several states, and also discussed the questions during meetings of NASCIO's State Connectivity and Broadband Working Group. This workgroup has been active for a number of years, and assisted our membership particularly in developing policies and position statements following the Recovery Act and the BTOP and RUS broadband-related grants. Below are our comments on the questions that NTIA is seeking responses to build the PSBN grant program based on the feedback we have received and staff analysis.

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The Consultation Process

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.

a. Who might serve in the role as a single officer within the State and will it or should it vary for each State?

NASCIO believes there should be a single point of contact or entity overseeing the coordination of the grants funds. The designation of a single officer or governing body will and should vary from state to state as the governing and management structure within each state varies. It is our view that each Governor be given the flexibility to appoint a state agency, commission, single officer or any entity they see fit to be responsible for management of the grants (i.e. Chief Information Officer, Chief Technology Officer, Statewide Interoperability Coordinator, existing board or commission, or other chief officer of the state).

It is critical, however, that in establishing the single point of contact, Governors should delegate the responsibility to individuals or organizations with a demonstrated capability of taking an integrative, holistic approach to the planning and build-out of the PSBN. The strategic, enterprise focus that guides state CIOs as they build, contract for, and maintain IP-based state telecommunications infrastructures positions them to be the ideal POC in some circumstances, and while one size does not fit all, state CIOs may be uniquely positioned in many states.

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

Over the past years, states have established several organizations which support the effective development and maintenance of public safety communications. In fact, many have codified these organization and structures into law. These committees, commissions, working groups and task forces coordinate and have representation from local and tribal governments. For instance, states coordinate public safety communications issues through State Interoperability Executive Committees (SIECs). The SIECs have representatives from state, local, tribal and federal governments, local law enforcement agencies, National Guard, other first responders and private sector partners. The State and Local Implementation grant

program should encourage states to leverage all pre-existing relationships to ensure coordination and input into the planning process.

From NASCIO's perspective and experience within the states, it is imperative the private sector be consulted during the planning process. The existing statewide integrated backbone networks, under the jurisdiction of the State CIO, are provisioned by private carriers under contract to the state. The state CIOs have more than a decade of experience crafting solicitations, negotiating contracts and monitoring service levels for outsourced IP-based communications infrastructure that support data, voice and video in the states.

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.

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?

While each state has unique needs, challenges and relationships with organizations and agencies that control the data or manage their infrastructures, NASCIO and the state CIOs consistently support enterprise architecture and standards to maximize the benefits and flexibility of the technologies they build or acquire. An enterprise architecture provides the framework for technical interoperability and increases the utility of the data by facilitating information sharing between data sources. In addition, defining an enterprise architecture process and standards provides significant benefits in initial procurement, training and support costs after build out. There is substantial evidence from the states that use of an enterprise architecture discipline and supporting processes helps to identify and mitigate project risks, reduce diversity, increase project success rates and smooth migration as states sunset technologies and adopt emerging solutions.

Therefore, NASCIO strongly urges NTIA and FirstNet to develop the framework and establish national standards and procedures. Data collection on current assets must be done under a consistent framework with naming standards during the planning phase. There will be key decisions in each state regarding network provisioning, addressing and common facility nomenclature that demand a consistent baseline. An example is the requirements NTIA established for the state broadband data collection and mapping programs which contributed information to the National Broadband Map project. Without establishing a process and standards for the data collection, the national map could not have been built with the robust features and functionality that benefit users and policy makers today.

The requisite policies and standards must be derived from the national policy imperative and need for an interoperable nationwide network. These policies and standards must be

established through an architecture governance process that starts with key principles for design and involves the stakeholders in decision making. Existing standards that support technical interoperability for mobile services should be the reference documentation.

State Funding and Performance Requirements

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?

The state CIO (or CTO) is in a unique position to merge what are normally two separate technology efforts: two-way radio and data networks. State CIOs have moved state networks to IP based communications. Many state CIOs and CTOs play a role in the planning and development of network infrastructure to support the PSBN. Many of them sit or chair their state SIEC. Even though some state CIOs many not manage public safety communications systems, they typically have responsibilities for network operations in their state whether outsourced or managed in-house. State CIOs offices can provide their enterprise technology management expertise; governance development; enterprise architecture; technical analysis; strategic planning; geospatial analysis and mapping data ; procurement; program, vendor and spectrum management.

NASCIO strongly believes state CIOs need to be included in this process because of their unique enterprise view and responsibilities in dealing with the state digital fabric on a daily basis. State Chief Information Officers support public safety activities through the statewide communications infrastructure. The PSBN build-out represents a singular opportunity to expand broadband across the state and nation. If CIOs are included and consulted during the grant process, NTIA will be able to take advantage of existing network infrastructure and the governance processes by which they're managed. In this regard, it is critical that CIOs are part of this process because of their expertise with statewide network services, IP-based networks and contract management to the table around which the public safety broadband interoperable network will be planned and implemented.

In response to the RFI, it is also important to understand the service business model of the state CIO organization. State CIOs have an obligation to ensure that state IT services are delivered in the most efficient and cost-effective manner possible. That work often leads to an examination of how the state's information technology service portfolio is managed and whether IT services and business solutions are provided via consolidated, decentralized or shared service modes of delivery. Operating under the leadership of the state CIO, the majority of state enterprise IT agencies are structured in a similar fashion and procure services on behalf of agencies and other public entities consolidating the services into service offerings on a chargeback basis, user fee or comparable model of delivering services.

Typically, the executive branch agencies and other entities are “customers” that purchase data center, communication services, network, e-mail, system backup, storage or other unit services under a published rate or pro-rated assessment method. Central state IT organizations acquire, manage or operate a suite of communications technology services to deliver voice, data and video services, including mobile. Generally these services are procured and sourced from private sector carriers/providers under a competitive solicitation. These services typically include local and long distance voice, wireless cellphone, smartphone services (voice, text and web access), interactive voice response (IVR) and other contact center functionality (e.g. predictive dialers, recorders, workflow/workforce management), Internet services, local area networks, wide area networks, “last mile” connectivity, virtual private networks, voice over IP (VoIP), video and audio conferencing and digital microwave.

In much commentary following passage of the Spectrum Act and in several of the RFI responses that we have seen, concerns have been expressed about the long-term viability of the PSBN, given the limited amount of funding that is being provided by the act. In the context of the business model described above, State CIOs constantly strive to maximize technology investment through integrative, standards-based procurements that meet multiple business needs with minimal redundancy of hardware and software components. This may position them uniquely to envision and help acquire PSBN solutions that fully leverage built infrastructure, fulfill other business needs of the state, and result in viable models going forward.

Other

19. Please provide comment on any other issues that NTIA should consider in creating the State and Local Implementation grant program, consistent with the Act's requirements.

Two key requirements not mentioned or ask about in the RFI are sustainability and protection of the PSBN. Through the grant program, states should be eligible to address how they will sustain the network. In many states, the CIOs provision technology services under an enterprise shared services portfolio with state agencies, local governments and other public entities as subscribers. CIOs are in a position to examine how to use secondary users to help sustain and maintain the network. In addition, with cyber threats becoming more sophisticated and the PSBN move into the digital world, cybersecurity should be addressed. Currently, protection of network infrastructure and cybersecurity is addressed at the enterprise level as part of the CIO's portfolio.

Conclusion

NASCIO encourages NTIA and the FirstNet Board to start a dialogue with State CIOs to build out the PSBN to implement joint solutions for critical public programs. We appreciate the

opportunity to comment on this RFI and look forward to working with NTIA and the FirstNet Board as it continues to evaluate ideas for the PSBN. If you have any questions, please contact Charles Robb, Senior Policy Analyst at (859) 514-9209/ crobb@amrms.com or Pamela Walker, NASCIO Director of Government Affairs at (202) 624-8477/ walker@amrms.com.

Yours Truly,



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