

National Public Safety Broadband Public Comments

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Consultation

1. State's preparation for FirstNet consultation:
 - a. What data should States compile?
 - Single point of contact and backup contact information.
 - Any statewide communications systems and associated specific geographic location information.
 - Any regional communications systems and associated specific geographic location information.
 - Any state or local government owned backhaul facilities (microwave, fiber, etc.) and associated geographic location information.
 - Commercial wireless networks and what geographic information that can be gathered.
 - Current number of mobile data terminal (MDT) users and current method and cost of connectivity.
 - Current integrator(s) of MDT to database within the state.
 - Local databases that would need to be integrated into a proposed public safety broadband network such as license plates, drivers licenses, hunting licenses, and other state or local information that would not normally be in NCIC & other federal databases.

Comment: It is going to be very difficult from the perspective of the states to know what level of planning to invest in without knowing what the architecture of the system will look like. To make this process more efficient, it would be wise for FirstNet to invest in common on-line databases with specific information fields for all data collection.

- b. Should this planning activity be covered by the State and Local Implementation grants?

The coordination with FirstNet and compilation of requested data will involve a significant amount of time. Most state-level organizations are run at minimum staffing levels, so the potential for contracting this out or temporary personnel outside of regular budgets would be present along with the need for that funding.

2. Coordination of grants by a state designee.

- a. Each state will have a different process for a designee. That could fall under the SAA for the state, or another agency that routinely handles and accounts for federal grants. It is logical that the responsible designee or agency have some connection with the end product for the broadband process, as this will take a significant amount of coordination within public safety and the state communications operations.
 - b. It is our preliminary plans in South Dakota to utilize our Statewide Interoperability Governance Board (SIGB) as a primary decision-making body as it encompasses most of the disciplines required representing users across the state. Our SIGB is currently exploring the process of modifying our Executive Order to include IT, Governor's Office, and Finance personnel. We currently do not have private partner representation, but do have technical, SWIC, local, federal, and tribal members.
 - c. See b.
 - d. See b.
 - e. Endorsement by a representative body like a SIGB that includes those particular representatives might be a good approach.
 - f. See e.
 - g. To the largest extent possible *interstate* collaboration should be encouraged. The grant process could expand the role of the FEMA regional offices, to coordinate both intra-region and inter-region collaboration. Other options would be to partner with organizations such as NGA or CSG to coordinate collaboration outside of state borders. It takes structure and funding to coordinate on a larger scale, which will be a major challenge for FirstNet.
 - h. See b.
3. Gathering of infrastructure data.
 - a. Grant funds should be used to obtain personnel for the project, provide proper equipment for collection and recording of data, and cover the extensive travel cost that will be associated with this project.
 - b. In order for a uniform and organized collection of data to be completed, FirstNet will need to define the standards of data they want collected:
 - Common GIS database be created for states to enter data.
 - Standardized tower type and condition.
 - Availability of backhaul access standardized, such as capacity, redundancy, etc.
 - Requirements for access to local databases that will be integrated.
 - Core connectivity requirements and data-center requirements.
 - c. This will entirely depend upon the organization that FirstNet comes to the table with. If standards are set and facilities are in place for collection of data, this can be completed in a far shorter time-period than if states have to develop their own collection process.
4. Governance and planning.
 - a. As specified above, South Dakota has an organized and involved SIGB, the South Dakota Public Safety Communications Council. This is an 18 member advisory board that makes major policy and operational decisions for the Statewide Interoperable Radio Network within our state. It has been an agenda item for several meetings to assume the same role for the planned nationwide broadband system as well.
 - b. As explained in a., the Council is preparing to take on the planning and policy-making responsibility for the broadband component as well as our current voice system. The

SWIC for our state is on the Executive Committee for that Council and has been working with the group on broadband as well as voice.

- c. The current Council will need to add at minimum a dedicated IT member, and discussion has been held to add a representative from the Governor's office as well as this will be a political as well as operational process.
- d. The update to the South Dakota SCIP will include a section on our broadband planning. It is a required update by DHS OEC to include this component in the 2012 update.
- e. States will need to include a section on broadband implementation in their SCIP's.
- f. If the costs would not be considered supplanting, then the costs to cover additional travel or facilities to add membership and hold public meetings should be eligible.
- g. In South Dakota, those costs are currently covered by General Funds. If the new mission and makeup of the council would qualify the group as a different entity, then it would be great to include those costs under the grant process.

5. Leveraging Existing Infrastructure

- a. States should not determine the suitability of existing infrastructure for integration with the national system. FirstNet will be sorting through mountains of irrelevant data if standards are not set prior to data collection. If not will be a waste of FirstNet and local time.
- b. States can assist the process by allowing use of tower/backhaul infrastructure as might be available, datacenters and other IT infrastructure, networking and RF staff resources.
- c. Utilities and other third parties will be notified of Council meetings and can participate as an interested party. These are public meetings and any and all interested parties may attend and participate.
- d. For rural areas such as South Dakota it makes ultimate sense to include private partnerships to help defray costs associated with maintaining the infrastructure. A separate and defined service offering should be outlined and offered to qualifying entities.

Comment: If states could offset costs by including public infrastructure into the network it would be well-received.

6. Incorporation of public infrastructure. If public infrastructure can be included in the network design, it would help if a standard rate for utilizing that infrastructure or offset of user costs would be established. The legal side of this would vary state by state and even locally, so might not be a clean process.

- a. States could prepare for this by establishing a uniform charge for access and reviewing liability issues prior to offering infrastructure.
- b. If a Joint Powers Agreement could be established with all amenable public tower owners within a state, it might make sense to use that as a clearinghouse, a national JPA would even be better.
- c. Any costs associated with this process should be allowable.

Comment: I cannot reiterate enough the need to define common requirements and standards prior to asking states for information. The time to collect and analyze data if not relevant to the process would be a huge waste of time and precious funding resources.

7. Best Grant Practices. As with any grant program, the states need grant guidance. As this is a national program with common technology, the guidance should apply to all involved.

8. Type of allowable activity:
 - Planning (admin, meetings, etc.)
 - Governance coordination
 - Data collection & compilation for infrastructure (public & private)
 - Data collection & compilation for current public safety broadband use
 - Regional coordination (intrastate and interstate)
 - Education/information.

9. Types of allowable costs:
 - a. The time and effort to collect information on current public safety broadband users and infrastructure will take time outside of normal business conducted as it will involve all levels of government within the state. This should be an allowable expense.
 - b. If such a position would be created, it would need to be clearly defined in the guidance how long the position would be funded through the grant process. I would assume the regular three-year performance period of the grant, but if states want to maintain the position, they will need to know when to budget for that. The needs in each state are going to vary by the personnel in place now. If a state has a strong technical staff, coordination and administration might be more important, for example.
 - c. Other suggestions:
 - Staffing time dedicated to the collection of data and coordination with first responders, FirstNet and associated contractors in the design and implementation of the network.
 - Mileage, per-diem, and lodging for personnel involved in the project.
 - Office space/supplies/equipment needed to collect and enter data.
 - Costs associated with public planning meetings to coordinate local policy and educate.
 - Travel costs for SIGB members directly involved with the project.

10. Rural area grants. The best aspect of this project is that it will be a national design. I assume that one responsibility of the current Broadband Interoperability Board that has been stood up to set minimum standards is to define that minimum level of coverage, and with those standards in place will become part of the RFP. That said, rural states such as South Dakota have unique coordination challenges compared to urban states. Most of the non-law enforcement responders are volunteers, many of the emergency managers are part-time, and distances are far between communities. This makes coordination a hit and miss proposition, with many only available after normal work hours. Travel costs associated with data collection also might be higher as there may not be local resources to gather and feed back to a central point.

11. In South Dakota all DHS grants are coordinated through the state SAA, prioritized by a Senior Advisory Committee, and administered through regional coordinators. We also have regional Councils of Government that may be able to effectively coordinate for their respective areas.

12. State Broadband Initiative (SBI).
 - a. South Dakota has a centralized IT/Communications function that has coordinated the SBI and will be central in the Public Safety Broadband Network (PSBN). Administratively and operationally the synergies between the two programs should be strong.

- b. With NTIA and the Department of Commerce involved in both processes, it would seem natural that there would be lessons learned from the first program that could be applied to the current, both from a national perspective and local perspective.
13. State and Local Grant Program Outcome. This question highlights the frustration in the field for those of us trying to follow along and keep up with this process. We need FirstNet to define for us what to expect, what is needed for data, and how we proceed.
- a. Supporting documentation for the grant program. This needs to be kept to a minimum to allow the states and locals to concentrate on the job at hand.
 - b. This will depend upon the criteria. Each state should set benchmarks for their own process justification and each state should be evaluated towards their own goals.
 - c. If there is data collection, again it needs to be an on-line, organized process that keeps entry and analysis to a minimum.
 - d. Unless the state or locality is a waiver recipient, there should be no existing data that would apply towards this project.
14. Project tools. Centralized tools would make this process much more efficient. The current Public Safety toolkit has widely used programs for narrowband, asset mapping, etc. The CASM asset mapping tool might be considered for this program, as some information is already entered into the system, and if expanded to include the requirements for this broadband project could potentially be a low-investment high-return effort.
15. Distribution of grant funds. The Clearing House drawdown method works as well as anything.
- a. NTIA funds should not be based upon population alone.
 - b. Other allocation methods need to factor in:
 - Land mass of entity. The process for collection of data will be far more involved in South Dakota with 77,000 square miles than it will be in Connecticut with 5,500 square miles. The number of resources that will need to be identified to enable service in South Dakota far exceeds that of the more populous Connecticut.
 - c. No. Funds should be available at the same rate of progress for the requesting state.
16. Involvement of the CIO or CTO. It is extremely important that the technology direction of the National Public Safety Broadband Network is consistent with the direction that the states are heading in. The core network will require network protocols that might not be consistent with what the states are currently utilizing. Many of the current state protocols are based upon requirements from HIPPA, MMIS, and a host of other privacy/security standards. Involvement by NASCIO and NASTD in the process would help avoid major security/privacy conflicts with the public safety broadband process.
17. Matching requirement. In-kind match offset for facilities, technical assistance, and other services provided by the states to the project should be considered.
18. Public interest waiver considerations:
- NSLP statistics for the state.
 - Tribal and federal lands within the borders of the state.
 - Population/land mass calculations.

19. I realize this has been emphasized throughout the document, but a common set of tools to enter the necessary data needed from the states, would not only make the process more efficient from the viewpoint of the states, but also the process of analyzing that data.