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National Telecommunications and Information Administration
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Request for Information

Introduction:

The Los Angeles Regional Interoperable Communications System Authority (LA-RICS)

offers these comments to the NTIA to assist in the planning efforts in establishing the State and

Local Implementation Grant Program (SLIGP).

LA-RICS also supports responses submitted by the Operator Advisory Committee (OAC)

and the State of California to this RFI.

In general, the LA-RICS believes that NTIA should consider the variety of different

situations and needs that each State will face in taking the next step in planning for the

Nationwide Public Safety Broadband Network (NPSBN). Since States vary in their current

status, grant funds should be distributed to each State based on the appropriate allocation

methodology determined by NTIA and the State should coordinate distribution of funds to

regional, local and tribal entities based on State's priorities and particular needs.

Additionally, LA-RICS believes success should be defined as wide scale adoption of the

service and nationwide interoperability. As a result, the State and local planning grants should

be fundamentally configured to collect information geared towards those two objectives. Furthermore, because public safety does not know what private entities will participate in RFPs nor what their proposals will be, it is critical that NTIA keep the door open to all viable business models that can deliver on the two fundamental objectives: adoption and interoperability. As a result, the planning process should also be configured to allow States flexibly to collect information to improve the likelihood of success. This includes collecting information from other public and private partners that help deliver a sustainable solution.

Currently, the LA-RICS project staff is collaborating with the Bay Area Regional Interoperable Communications System (BayRICS) and the State of California in determining next steps in the planning effort for the NPSBN.

The Consultation Process

1. Section 6206(c)(2) of the Act directs FirstNet to consult with regional, State, tribal, and local jurisdictions about the distribution and expenditure of any amounts required to carry out the network policies that it is charged with establishing. This section enumerates several areas for consultation, including:
(i) construction of a core network and any radio access network build-out;
(ii) placement of towers;
(iii) coverage areas of the network, whether at the regional, State, tribal, or local level;
(iv) adequacy of hardening, security, reliability, and resiliency requirements;
(v) assignment of priority to local users;
(vi) assignment of priority and selection of entities seeking access to or use of the nationwide public safety interoperable broadband network; and
(vii) training needs of local users.

What steps should States take to prepare to consult with FirstNet regarding these issues?

In order to fully prepare for detailed interactions and consultation with FirstNet, the LA-RICS Authority recommends that States establish governance structures (or build on currently existing structures), create outreach and education programs, and develop information gathering

mechanisms by which they will gather the information needed to effectively consult with FirstNet.

a. What data should States compile for the consultation process with FirstNet?

Detailed site assessments for potential RAN site locations

- States should compile a list of all wireless communications sites used by public safety within the State; to include LMR and private data solutions. The list should also incorporate government buildings and open spaces that are potentially suitable for LTE facilities.

- States should provide a brief feasibility analysis concerning the structural usability of the site; to include, preliminary loading assessment, heights and space availability and equipment room access.

- Availability and access to back-up battery, UPS and generator power should be identified.

- Access to backhaul (microwave and fiber) to be noted together with backhaul redundancy and microwave technology (IP or circuit switched).

Data Centers / Communications Centers

- States should compile a list of all their data centers, PSAPs, key command centers and/or communications hubs to where connectivity to FirstNet will be required.

Connectivity assets

- States should compile drawings (Layer 1) of all connectivity between the existing and potential wireless sites and data centers, the medium type (fiber, microwave, etc.), scalability, and available capacity.

LMR & Private Data Systems

- We are presuming that nationwide push-to-talk voice interoperability is a requirement for

the service, and therefore, States should compile a list of all State, local and tribal LMR and private data systems within the State to include the technical information on the radio control points for each system and the desires of the system owners to interoperate with the broadband network.

Coverage Requirement

- States should compile their coverage requirements on a county-by-county basis as defined by the local first responders (the use of historical CAD data would provide excellent justification) (Historical events to be shown as dots, coverage areas to be designated by polygons). The local stakeholders should specify their service area to include critical facilities within their service areas.

- For each area, the following elements should be defined:

  - Usage scenarios: outdoor portable, in-vehicle, in-building (including the required level of in-building service).

  - Minimum performance level: applications required or minimum throughput required for each service area.

  - The data should be provided in standard Geographic Information System formats to enable use by FirstNet and private partners.

End Users

- States should compile a list, on a countywide and/or statewide basis, of the number of users per agency and the relative priority each user group would have over the other. The States are to identify the breakdown of end users in two (2) categories; Primary and Secondary user.

  - Primary users shall be the Public Safety Entities as defined by the law.

o Secondary users shall be non-Public Safety Entities.

- A detailed list of State, local and tribal first responder commercial cellular users should be assembles to include: Type of service plan (data, voice, voice/data), the service provider identified, and the cost of the plan, includes fees, taxes and other charges.

- A detailed list of private data systems, scope of the systems, and their users.

In addition, depending upon the approach adopted by FirstNet, FirstNet or States may need to research State and local laws to develop standard agreements or MOUs to define the relationship between regional, tribal and local entities that control sites and other assets, (e.g. site and backhaul access and use agreements).

b. Should this activity be covered by the State and Local Implementation grant program?

Absolutely. Valuable activities and services covered by the SLIGP should include program management, program administration, needs assessment, consultation for fiber route/design, microwave backhaul options and 4G LTE wireless optimization. In addition, the grant should support funding for outreach and education.

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. [6]
a. Who might serve in the role as a single officer within the State and will it or should it vary for each State?

States will undoubtedly vary in choosing an individual or agency to serve as the coordinator of implementation of the grant funds. NTIA should accommodate and support such variance and allow each State to appoint the most qualified individual within its structure.

Some possibilities include, but are not limited to the Chief Information Officer, the Public Safety Communications Director, Chief Technology Officer, State Administrative

Agency or Homeland Security Director.

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

The governmental body that serves as coordinator for the grant program need not be the same body as the governance organization or structure designated by the State to serve as the representative body for regional, local and tribal entities.

The governance entity in association with the NPSBN should include multi-discipline representatives and regional, tribal and local entities to ensure adequate and fair representation. Participants should be at the sole discretion of the State.

c. How should the States plan to involve the local entities in the State and Local Implementation grant program?

There are many ways to involve local entities. It should be decided by each individual State since State outreach programs will vary.

d. How should the States plan to involve the tribal entities in the grant program?

The statue makes clear that tribal entities are to be involved in the consultation and deployment phases of the nationwide network. However, planning funding is to be provided to States. Accordingly, States with tribal entities should undertake efforts to involve tribal entities in the planning and governance structures. This can be accomplished through outreach with funding available to Tribal entities through the State as needed to facilitate information gathering and participation. The process for undertaking this may vary from State to State depending on existing circumstances and accordingly NTIA should allow each State to determine the best method for undertaking this effort and include a description and plan in its grant application.

e. What requirements should be included in the grant program to ensure that local and tribal public safety entities are able to participate in the planning process?

State's should have flexibility in determining the best approach for outreach, therefore NTIA should evaluate such activities after reviewing information States submit in their grant applications. The grant application could include an explanation of how local and tribal entities will be included. Possibly points of contact for each local and tribal entity could be established by each respective State to ensure that the planning process is successful.

f. How should the State and Local Implementation grant program ensure that all public safety disciplines (e.g., police, sheriffs, fire, and EMS) have input into the State consultation process?

The grant should require the States to develop a process for public safety input but leave the States wide discretion as to the structure and details of that process.

g. How should the State and Local Implementation grant program define regional (*e.g.,* interstate or intrastate) and how might the grant program be structured to facilitate regional participation through the States?

NTIA should define "regional" to enable States to help both "regional" jurisdictions within a State (such as a multi-county authority) as well as those that cross State lines (such as the National Capital Region) or are comprised of two or more entire States (such as a collection of States from a given FEMA region, for example).

In determining their governance structures, States should be encouraged to recognize any existing regional organization which provides public safety communications services, e.g. regional public safety communication organizations or a communications district providing a 700 MHz, 800 MHz, VHF or UHF regional trunked public safety network.

Several Waiver Recipients have a robust experience in developing regional governing bodies. For example:

The BayRICS Joint Powers Authority, established in August 2011, has become a recognized model for fair and transparent representation, having since executed a regional Build-

Own-Operate-Maintain agreement with Motorola for the BayWEB project, hired a general manager and established by-laws, procedures, and a regular meeting schedule to oversee this complex project.

In 2009, Los Angeles established a Los Angeles Regional Interoperable Communications System (LA-RICS) Joint Powers Authority. The Authority 17 member Board of Directors represent 88 member jurisdictions. The LA-RICS Joint Powers Authority has established regular meetings, bylaws and four standing committees (technical, operational, finance and legislative).

These examples are only a sample of the many successful governance practices already developed.

h. How should States plan to involve the Federal users and entities located within their States in the grant program?

States should consider treating Federal entities like any other governmental entities, at least for planning purposes. Though Section 6302(a) of the Act does not list Federal entities among those that the grant program is designed to assist, States should endeavor to include Federal entities in their grant planning processes in order to assess their needs. The direct cost to federal entities of their participation, however, would not be covered by the planning grants.

Typically State and local government agencies already have established relationships with Federal users, e.g. state emergency managers with the local FEMA region, local law enforcement and fusion centers or joint anti-terrorism task forces. States should be encouraged to collaborate with federal users and gather information about their needs and potential uses.

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.

a. Given these interrelated activities, how should the State and Local Implementation grant program be used by States to assist in gathering the information to consult with FirstNet?

The State and Local Implementation Grant Program should be structured to provide all types of support for gathering this information. These elements should include: requirements development, related tools to assist States in outreach efforts (i.e. survey tools, websites, databases, etc.), IT infrastructures, personnel and professional services. In order to gather and organize relevant, accurate and useful information, the States will most likely require funding for collecting information from a wide variety of sources.

b. Should consistent standards and processes be used by all States to gather this information?

As the system builder, FirstNet should establish general guidelines, indicating what information it wants States to collect, and the format of such collected information. But every State will be different and will need flexibility in determining the best standards and process to gather this information.

If so, how should those policies and standards be established? What should those policies and standards be?

As the network builder, FirstNet should specify, after consulting with the States, the information it wishes States to collect and the format of that information. State agreement will be critical; it will not benefit the initiative for FirstNet to request information that States cannot provide.

Potential policies and standards should include:

- Good outreach programs that take into account all stakeholders and accounts for public safety agencies, and their respective points of contact.

- Webinars, tools and templates to assist States in gathering data similar in form once the type of data is identified.

c. What time period should NTIA consider for States to perform activities allowed under the grant program as it relates to gathering the information to consult with FirstNet?

NTIA should provide time periods that address individual State needs, as some States will require additional time to gather information if they have a large population with more agencies and users. States should provide timelines in their grant application and NTIA can determine the appropriate time necessary to complete planning activities based on submitted grant application. Since the information is critical to FirstNet, the timeline should not exceed 24 months. States should have an opportunity to request extensions to 24 months if necessary to complete planning activities.

LA-RICS believes that the urgency of this process should be balanced by the need to do it correctly.

Existing Public Safety Governance and Planning Authorities

4. Over the years, States have invested resources to conduct planning and to create governance structures around interoperable communications focused primarily on Land Mobile Radio (LMR) voice communications, including the Statewide Interoperability Coordinators (SWIC) and Statewide Interoperability Governing Bodies (SIGB), often called Statewide Interoperability Executive Committees (SIEC).

a. What is the current role of these existing governance structures in the planning and development of wireless public safety broadband networks?

SWIC's and SIECs are currently the logical and most knowledgeable organization for moving the public safety broadband effort forward. Current governance structures in each State vary, and LA-RICS encourages NTIA/FirstNet to consult with each State independently to obtain current status.

b. What actions have the States' governance structures (*e.g*., SWIC, SIGB, or SIEC) taken to begin planning for the implementation of the nationwide public safety broadband network?

This information will vary by State. NTIA/FirstNet will need to conduct outreach to each

State to obtain this information.

c. Can these existing governance structures be used for the PSBN, and if so, how might they need to change or evolve to handle issues associated with broadband access through the Long Term Evolution (LTE) technology platform?

This information will vary by State. NTIA/FirstNet will need to conduct outreach to each

State to obtain this information.

d. What is or should be the role of the Statewide Communications Interoperability Plans (SCIPs) in a State's planning efforts for the nationwide public safety broadband network?

This information will vary by State. NTIA/FirstNet will need to conduct outreach to each

State to obtain this information.

e. What actions do the States need to take to update the SCIPs to include broadband?

Once the fundamental decisions for each State are made regarding the planning and

deployment of the NPSBN are made, the States should update their SCIPs accordingly.

f. Should the costs to change or evolve existing governance and Statewide Plans be eligible in the new program?

Yes.

g. Should the maintenance of those existing governance bodies and plans be eligible in State and Local Implementation grant program?

Yes.

Leveraging Existing Infrastructure

5. How should States and local jurisdictions best leverage their existing infrastructure assets and resources for use and integration with the nationwide public safety broadband network?

This question cannot be answered fully without a better understanding of the business

model for the network ultimately selected by the FirstNet Board of Directors. The manner in which FirstNet will obtain access to State and local infrastructure will depend on the network architecture adopted by the FirstNet Board.

For example, if FirstNet ultimately determines that it will own and maintain all aspects of the NPSBN, including the national core and backbone as well as the radio access network (RAN) at State and local levels, then State and local governments would be simply customers of the NPSBN, paying user fees for access to the public safety network. Planning funds should be provided to determine the impacts on the administration/financial process to accommodate this model. Most jurisdictions would consider requests to access State and local infrastructure no differently than similar requests from private providers for use of such infrastructure.

If, however, FirstNet controls and maintains only a national backbone network for the NPSBN, while State and local governments own, operate and maintain State and local RAN interconnecting with the national backbone network (under a uniform set of standards adopted by FirstNet), then State and local governments would more likely become active participants with FirstNet in network development and implementation. Under this model, State and local infrastructure could be integrated into the NPSBN by way of in-kind contribution, thus reducing the cost of access to State and local infrastructure.

For this reason, it may be appropriate to reserve a portion of the planning grant until the FirstNet Board provides more information about the business model of the NPSBN, at which time the funds can be more appropriately allocated. Our comments to this series of questions will thus be limited to the context of the planning grant program and the potential uses of funding that may apply under any potential business model.

Potentially, planning grant funding might be used for any of the following purposes that

would assist State, regional, tribal and local governments in planning for integrating existing infrastructure assets and resources into the NPSBN:

- Infrastructure inventory and cost analysis:

    o Inventory of available sites (public safety and other government owned)

    o Inventory of government owned backhaul (fiber and microwave)

    o Inventory of additional sites and backhaul

    o Evaluation of sites and backhaul to determine upgrade and remediation needs

    o Costs of such upgrade and remediation

    o Cost of site/backhaul acquisition (lease fees, permit fees, etc.)

    o Cost of site/backhaul use and maintenance (electricity, staff time for site visits)

    o Need to identify additional assets to complete coverage and backhaul

- Research of State and local laws to develop standard agreements or MOUs to define the relationship between regional, tribal and local entities that control local infrastructure (e.g. site and backhaul access and use agreements).

- Collection of the following data:

    o Estimated user counts

    o User needs assessment (applications, devices, etc.)

    o User agency back-office (e.g. PSAP or dispatch center) connectivity needs

a. How should States and local jurisdictions plan to use and/or determine the suitability of their existing infrastructure and equipment for integration into the public safety broadband network?

There must be nationwide standards for infrastructure, e.g. hardening of radio sites, space available for equipment in buildings, tower wind loading and maintenance standards.

The cost for access to State and local infrastructure will likewise depend on the degree of collaboration with State and local governments dictated by the adopted network model.

b. What technical resources do States have available to assist with deployment of the nationwide public safety broadband network?

Every State has an office/agency responsible for the deployment, management, and procurement of information technology resources. The grant program should make funds available for State technology agencies to contract to survey State, tribal and local infrastructure that may be available for incorporation into the NPSBN. In some States, regional, tribal or local authorities may be the more appropriate entity to conduct the survey.

c. How will States include utilities or other interested third parties in their planning activities?

Other parties, such as utilities, educational and medical institutions and transportation agencies will be critically important to the success of the NPSBN, both as infrastructure providers and end users. Such entities' needs should be taken into account in governance and planning activities.

d. Should NTIA encourage planning for the formation and use of public/private partnerships in the deployment of the nationwide public safety broadband network? If so, how?

The States should use every possible option to work with FirstNet to offset the costs of building and maintaining their portion of the NPSBN RAN. This includes State, Local and Tribal hardware, right of way and Public/Private partnerships (including partnerships with utilities and private concerns). The "how" will be dependent on each State's selective approach and their individual legal and regulatory position.

The NTIA should encourage the participation of public/private partnerships (PPP) in the implementation of the NPSBN. However, as with the above responses, the degree of possible of

PPP participation will depend on the network architecture model adopted by FirstNet. The adoption of a network architecture model that encourages active participation by State and local governments would open the door for these governmental entities to partner with private companies under PPP arrangements.

6. Section 6206(b)(1)(B) of the Act directs FirstNet to issue open, transparent, and competitive requests for proposals (RFPs) to private sector entities for the purposes of building, operating, and maintaining the network. How can Federal, State, tribal, and local infrastructure get incorporated into this model?

a. How would States plan for this integration?

Once again, this question cannot be answered fully without a better understanding of the ultimate business model for the network selected by the FirstNet Board of Directors. The manner in which Federal, State, tribal, and local infrastructure will be incorporated into FirstNet will depend on the network architecture adopted by the FirstNet Board.

b. Should States serve as clearinghouses or one-stop shops where entities bidding to build and operate portions of the FirstNet network can obtain access to resources such as towers and backhaul networks? If so, what would be involved in setting up such clearinghouses?

Yes, the State should serve as a clearinghouse or one-stop shop. In some cases, State's ability to serve as a state-wide clearinghouses or one-stop shop may be limited because most State governments cannot compel tribal and local governments to grant access to their infrastructure to private companies building the NPSBN without fair compensation.

c. Should setting up a clearinghouse be an eligible cost of the grant program?

Yes.

State and Local Implementation Grant Activities

7. 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?

The NTIA should consider taking into consideration the cooperative and supportive approach fostered by DHS and the OEC, as these organizations have shown a solid understanding of how to establish enduring and cooperative relationships.

The Broadband Technology Opportunities Program (BTOP) grant also provides several best practices in terms of grant management procedures:

- Online grant management tools, such as grantsonline or PAM that provide a quick and uniform process to administer the grant.

- Uniform guides and templates for reporting, modifications, and other grant requests.

- Fact sheets that provide a quick glance and key issues.

- Seminars and webinars that detail critical aspects of the grant, i.e. match requirements, reporting requirements, etc.

- Match contributions from recipients that include both cash and in-kind match.

8. What type of activities should be allowable under the State and Local Implementation grant program?

The SLIGP should allow for the following activities:

- Administrative expenses and legal services

- Consulting services

- Project management services

- Site valuation and acquisition services

- Environmental services

- Data gathering

- Engineering services

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

All costs associated with activities listed in item 8 above and all cost associated with gathering information required for consultation process with FirstNet:

Some examples include, but not limited to:

- Personnel costs required in the planning process (i.e. grant administrators, project managers, accountants, financial analysts, etc.)

- Planning meetings

- Costs associated to establishing local governance

- Development of plans and business models

- Environmental documentation and assessment of potential sites

- Training regarding grants and LTE technology

- Travel costs

- Grant application costs

a. Should data gathering on current broadband and mobile data infrastructure be considered an allowable cost?

Yes. Data gathering will require dedicated staff time to conduct outreach and make sure data is complete and accurate. With current budget cuts, State and local jurisdictions need funding to provide adequate staff to gather data. Such data will provide States with information in assessing existing infrastructure and projecting for future infrastructure.

b. Should the State and Local Implementation grant program fund any new positions at the State, local, or tribal level that may be needed to support the work to plan for the nationwide public safety broadband network? If so, what, if any, restrictions should NTIA consider placing on the scope of hiring and the type of positions that may be funded under

the grant program?

Yes, State and local jurisdictions are experiencing unprecedented budget cuts and may not have the staff necessary to execute on the various tasks required. State and local jurisdiction should have the flexibility to determine if these capabilities would be provided by employee position or contractors/consultants. Appropriate full and part time resources should include, but are not limited to:

- Engineers
- Grant administrators
- Project staff members
- Environmental specialists
- Accountants
- Project managers
- Real estate specialists
- Attorneys

10. What factors should NTIA consider in prioritizing grants for activities that ensure coverage in rural as well as urban areas?

No response.

11. Are there best practices used in other telecommunications or public safety grant programs to ensure investments in rural areas that could be used in the State and Local Implementation grant program?

No response.

12. In 2009, NTIA launched the State Broadband Initiative (SBI) grant program to facilitate the integration of broadband and information technology into state and local economies.

a. Do States envision SBI state designated entities participating or assisting this new State and Local Implementation grant program?

No response.

b. How can the SBI state designated entities work with States in planning for the nationwide public safety broadband network?

No response.

13. What outcomes should be achieved by the State and Local Implementation grant program?

a. Are there data that the States and local jurisdictions should deliver to document the outcomes of the grant program?
b. If so, how should they be measured?
c. Who should collect this information and in what format?
d. What data already exist and what new data could be gathered as part of the program?

At this time, it is difficult to determine documents that measure outcome. Until FirstNet

provides information regarding the duties and responsibilities of States, it is not clear what

documents will be required to measure outcomes. However, NTIA can consider description of

the following activities:

- Evidence of governance structure

- Evidence of outreach efforts, including rural and tribal

- Asset and site inventory lists

14. The U.S. Department of Homeland Security's Office of Emergency Communications (OEC) has developed the following tools through its Technical Assistance Program available at http://www.publicsafetytools.info, including:

(1) Mobile Data Usage and Survey Tool – Survey process to document the current-state mobile data environment, in preparation for a migration to LTE;
(2) Statewide Broadband Planning Tool– Template and support on Statewide strategic broadband planning issues designed to serve as an addendum to the SCIP;
(3) Frequency Mapping Tool – Graphical tool to display FCC license information and locations including cellular sites within a jurisdiction; and
(4) Communications Assets Survey and Mapping Tool (CASM) – Data collection and analysis tool for existing land mobile radio assets. Should States be encouraged to utilize tools and support available from Federal programs such as those developed by OEC?

Are there other programs or tools that should be considered?

No response.

15. Do the States have a preferred methodology for NTIA to use to distribute the grant funds available under the State and Local Implementation grant program?
a. Should NTIA consider allocating the grant funds based on population?
b. What other targeted allocation methods might be appropriate to use?
c. Should NTIA consider phasing the distribution of grant funds in the new program?

LA-RICS recommends that the methodology for NTIA prioritize population and high-risk areas in determining grant allocations. Such areas, like Los Angeles, have a large public safety community that would benefit from the NPSBN in case of an emergency, disaster or homeland security threat.

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?

In many States, CIOs and CTOs offer a broad view of the current technology within the State. Ultimately, it should be left to the State to determine the role of the CIO and/or CTO.

17. The Act requires that the Federal share of the cost of activities carried out under the State and Local Implementation grant program not exceed 80 percent and it gives the Assistant Secretary the authority to waive the matching requirement, in whole or in part, if good cause is shown and upon determining that the waiver is in the public interest. As NTIA develops the State and Local Implementation grant program, what are some of the factors it should consider regarding States' ability to secure matching funds?

It is critical for the success of FirstNet to encourage participation from all States since they are required to provide a large amount of data regarding sites, backhaul, users, etc. For this reason, NTIA should consider waving the match requirement for planning activities. If the match requirement is applicable to planning activities, it is in FirstNet's and the public interest to

set a low contribution level if a State is unable to meet match requirements. States should also be allowed to provide both in-kind match and cash match to meet match requirements.

Furthermore, many States and local jurisdictions have committed resources and funding to early deployment and such activity should be given special consideration as they have demonstrated commitment to the program through early planning.

18. What public interest factors should NTIA consider when weighing whether to grant a waiver of the matching requirement of State and Local Implementation grant program?

FirstNet is required to build a nationwide public safety network which will need coordination from States. States in turn will need planning funds to provide FirstNet with accurate and adequate information.

If the match requirement impedes this coordination then it does not serve public interest. Therefore, any showing of financial hardship in contributing match funds should be considered if such match will prevent a State from participation.

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.

NTIA/FirstNet will need to move expeditiously on defining the grant process and standards so that States and local entities can begin/continue to move forward with their planning and implementation efforts.

If you have any questions, please contact me at (323) 881-8290 or Pat.Mallon@la-rics.org.

Sincerely,

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