

June 15, 2012

Via Electronic Mail and Regular Mail

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

Re: Docket No. 120509050-1050-01: Development of the State and Local Implementation  
Grant Program for The Nationwide Public Safety Broadband Network Request for  
Information

To whom it may concern:

On behalf of the NTIA-Funded Broadband Rhode Island Initiative, enclosed please find responses to the following questions in the May 16, 2012 Request for Information issued in the above-captioned matter.

Please let me know if you have any questions.

Sincerely,



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**Responses to NTIA RFI: Public Safety Broadband Network**  
**Stuart Freiman**  
**Broadband Program Director**  
**Rhode Island Economic Development Corporation**  
**June 15, 2012**

**Question 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?

**Response:** It could vary for each state, but given that the NTIA has already established an infrastructure within the states to manage intergovernmental relationship associated with various broadband funding programs we suggest that the NTIA continue to utilize the current designated entity in RI. That entity in Rhode Island is the Broadband Program Director, presently housed at the Rhode Island Economic Development Corporation (RIEDC).

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)?

**Response:** All of the above. In RI, it would be particularly important to assure that the coordinating agencies such as RI Emergency Management Agency & representatives of the local public safety entities participate in this effort.

**Question 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.

b. 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?

**Response:** Yes, consistent standards should be used by all states. It would be tremendously efficient and save costs as well as increase the value of the National Broadband Map if these already established standards and processes for data collection, modeling and mapping formed the basis for this effort.

**Question 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?

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?

**Response:** Yes. Clearly, the ongoing maintenance and expansion of this network is going to require significant resources in both people and money. In addition, the nature of public safety communications is such that there is usually excess bandwidth when not in an emergency situation. Partnering with the private sector opens the opportunity to leverage their experience and resources in addressing these issues.

**Question 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?

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?

**Response:** Yes. Since the Public Safety Broadband Network is a state resource, it is important that the state play an active role in understanding both the asset required to build the network and the assets that the state can leverage in its development. Further, this also addresses question 5d in that these assets could also be leveraged in a private public partnership. Setting up this clearinghouse should be a function of the state broadband advisory board or equivalent entity as it addresses assets owned by various state entities.

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

**Response:** Yes as it will require the state to develop the data and processes for the clearinghouse, which currently does not exist.

**Question 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)?

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

**Response:** Yes, and referring back to question 2b, this is a great opportunity to both leverage the current data gathering for the National Broadband Map efforts and continue those efforts once the SBI grants are expired.

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?

**Response:** It is important for the state to be able to understand the implementation and integration of broadband with other existing technologies as it relates to public safety. Hence it would be vital to hire resources in this area. In addition, we will need program management resources to track progress on the development and building of the network as well as developing intergovernmental processes, policies and procedures to use the network.

**Question 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?

**Response:** Yes. In Rhode Island the SBI program has facilitated the interaction between various state agencies and entities in the area of broadband and will continue to do so in a more formal manner. This program is an excellent opportunity to exercise the value of these new statewide linkages and continue to demonstrate the importance of a statewide broadband focus.

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

**Response:** The formal SBI-developed statewide broadband effort is the logical place for statewide, senior-level discussion around state planning and implementation of the new nationwide broadband public safety network.