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June 15, 2012

Via Electronic Mail

The Honorable Lawrence E. Strickling
Assistant Secretary and Administrator
National Telecommunications and Information Administration
US Department of Commerce
Washington, D.C. 20230

Re: Comment of the State of Rhode Island,
Emergency Management Agency
Development of the State and Local Implementation
Grant Program for the National Public Safety
Broadband Network
Docket No. 120509050-1050-01

Dear Assistant Secretary Strickling:

On behalf of the Rhode Island Emergency Management Agency (RIEMA), this letter responds to the National Telecommunications and Information Administration (NTIA) request for information (RFI) regarding the State and Local Implementation Grant Program for the Nationwide Public Safety Broadband Network (NPSBN) created by Public Law 112-96. The grant program is a critical element of the law's commitment to deploy a public safety broadband network to support state and local governments in their responsibility to assist citizens facing an emergency. NTIA should be commended in moving expeditiously to consult with state, local, tribal and regional agencies.

The request seeks information on a wide range of areas relating to the funding program the law establishes. It inquires of governance structures, leveraging existing infrastructure resources, best practices for public safety communications grant programs, information collection factors and criteria, state funding and performance requirements and the possible waiver of these requirements. The extent and complexity of the challenge is presented not only by the grant program, but also the broader objective of deploying a NPSBN. Importantly, the

law recognizes that the most effective path relies on meaningful participation and cooperation with state, local and Tribal governments.

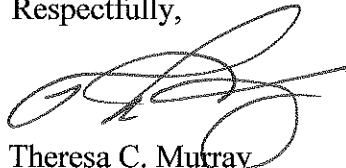
As NTIA moves forward in implementing the law, we suggest that it expand its solicitation of views to include meetings and exchanges at state or regional levels with those responsible for the delivery of emergency services and communications. While lacking the structure of formal comments and requiring broader outreach, a critical element of emergency response and homeland security is understanding that the first responders are officers and other personnel of local and state governments. Our recommendation is based not only on promoting the views of these agencies but the understandings that will evolve at the state and local level in the decisions NTIA must make. The NPSBN's successful deployment and operation is as much dependent on shared responsibilities for its success as it is in resolving the complex technical and logistic matters accompanying it.

We also recommend that NTIA pursue delineating the subject matters that need to be addressed. While the request for information by necessity encompasses a wide range of issues, it will be some time before all the areas can converge. The significant expertise at the state and local level can more readily examine and respond to particular subject areas. Delineation will also promote discussion and exchange at the local level as it will bring to the forefront practices and policies that are viewed as fair and effective. Such a tact will also engender participation across the technical and operational disciplines in state and local government, an objective highlighted by the RFI's emphasis on participation by Chief Information or Technology officers.

More generally, we urge NTIA to be cognizant and flexible of the process and policies by which state and local agencies coordinate and cooperate within a particular state or across a region. There should be transparent responsibility and accountability, yet how these elements are structured should not be artificially imposed. In an era where homeland security and emergency service is at the forefront, effective mechanisms should be preserved. We think this is an aspect of ensuring local participation and responsibility in meeting the challenges associated with the NPSBN.

Much is at stake in deploying and operating a National Public Safety Broadband Network. Emergency response is a crucial responsibility of government upon which the citizen relies and which the NPSBN can make a real contribution. Rhode Island is committed to the law's objective and providing support to NTIA. Please call upon us to assist your efforts.

Respectfully,

A handwritten signature in black ink, appearing to read 'Theresa C. Murray', written over a horizontal line.

Theresa C. Murray
Executive Director