

State of Alaska's Comments on the National Telecommunications and Information Administration's (NTIA) Request for Information Development of the State and Local Implementation Grant Program for the Nationwide Public Safety Broadband Network

The Consultation Process

1. Who would be the best person or persons to serve as coordinator or on a governing body responsible for grant funds within the state?

Response: *Alaska believes that a single individual or office acting on behalf of the governor, and strongly assisted by a fully representative advisory board is a model that would work well. Alaska would be able to use the already existing Alaska Interoperable Communications Committee (AKICC) as that advisory board by establishing a Public Safety Broadband Network (PSBN) subcommittee within AKICC. By ensuring there was broad representation on the PSBN subcommittee, voices of rural communities, Alaska Natives, and industry would be heard.*

States should be permitted to establish who will act as SAAs (State Administrative Agencies) for this new grant program. It is not at all clear that NTIA's State and Local Implementation grant program should be administered the same way that other communication-related grant programs have been administered (for example, in Alaska, through the Department of Military and Veterans Affairs).

2. What mechanisms should be put into place to ensure adequate involvement by local and tribal public safety entities? How should states coordinate with any federal users or entities within their borders?

Response: *Alaska has three different statewide communications-related groups, each of which seeks to maintain a diverse membership and each of which seeks to include local users from both large and small/remote communities and Alaska Native interests. The aforementioned AKICC has stakeholders from rural communities as do the Alaska Land Mobile Radio¹ (ALMR) User Council, and the Alaska 9-1-1 Working Group. Federal partners are involved in AKICC and the ALMR User Council, also.*

Any mechanisms that mandate involvement of federal, local, and tribal users would not be unreasonable to the degree that involvement levels could be determined by the states. Alaska already has high levels of federal involvement in communication planning. Provisions must be made for Alaska's particular circumstances insofar as there is very little Indian Country (only one small reservation) in the state. Language would need to be adopted that allowed for the participation in PSBN activities by representative Alaska Native organizations (perhaps via existing non-profit regional Alaska Native corporations) instead of through mandates that might compel directly working with hundreds of small Alaska Native villages.

¹ ALMR is a consortium of local government, state, federal, and Department of Defense agencies who operate a land mobile radio network.

3. How might the grant program be structured to facilitate regional participation by the States?

Response: *With respect to Alaska, the concept of interstate collaboration becomes more complicated. Our nearest neighbors are Canadian provinces, not states. Our nearest states are physically disconnected from us, but we participate in many of FEMA's Region X efforts, including the RECCWG (Regional Emergency Communication Coordination Working Group) which strives to identify and overcome regional first responder interoperability challenges.*

Regional approaches make sense and since there are already regional (intrastate and interstate) communications networks in the continental U.S., it might be a smart business practice to leverage those existing networks as PSBN is built out.

4. What policies and standards should be established to ensure coordination among federal and state entities with regard to existing infrastructure, tower placement, network coverage, etc.? Should these standards be used for all states? How much time should states be given to gather the information?

Response: *Grant guidance should stipulate that wherever possible, provided that there are no technological or security problems created as a result, that state and federal infrastructure should be shared. Many states have already catalogued much of their infrastructure information and on the assumption that federal authorities also know where their entire communications infrastructure is located, this shouldn't take too long to collate and update. Regarding the question of whether standards should be used for all states, if technological differences exist, which is often the case in Alaska, some adjustment of those standards may be necessary.*

Existing Public Safety Governance and Planning Authorities

1. What is the current role of existing governance structures in the planning and development of public safety broadband networks? What actions has the state taken to begin the implementation of a nationwide public safety broadband network?

Response: *At this point, there has been no specific role for existing communications governance structures in the planning and development of the PSBN. Alaska is taking a close look at using its SIGB (Statewide Interoperability Governance Body) called AKICC (Alaska Interoperable Communications Committee) as the stepping off point for the PSBN effort. As mentioned earlier, creation of a subcommittee within AKICC would leverage the existing organization's established relationships as opposed to creating a new mechanism out of whole cloth.*

The Statewide Broadband Task Force (BBTF) is focused on creation of a state broadband strategy. The task force and the subsequent broadband plan is a component of a grant funded by the State Broadband Initiative [SBI]. In 2011, it began a two-year effort to collect information, analyze data and costs related to Alaska's long-term, statewide broadband deployment, in particular in rural (underserved) areas. The work of the task force may provide a strong jumping off point for PSBN efforts in Alaska. While the task

force's mandate is much broader than that of any future Alaska PSBN committee, the expertise and information it develops should make identification of key Alaska PSBN stakeholders easier.

To this point, no formal steps have been taken regarding implementation of the PSBN.

2. What is or should be the role of Statewide Communications Interoperability Plans (SCIPs) in planning efforts for the nationwide network? What actions, if any, need to be taken to update SCIPs to include broadband?

Response: *There is clearly a role for SCIPs in planning for the PSBN. It would make no sense to have the PSBN efforts operating outside of the 'umbrella' the SCIPs provide for all other communications initiatives. And yes, SCIPs would need to be updated to reflect PSBN. What exactly those updates would involve is not clear yet.*

3. Should the costs of updates to or maintenance of existing governing bodies and SCIPs be eligible under the new State and Local Implementation grant program?

Response: *Yes. Because states have invested so much time and grant money and general funds in creating and updating SCIPs, it would be unreasonable to either 1) let the SCIPs become functionally obsolete as PSBN planning efforts were advanced due to lack of funding, or 2) to require states to embark on significant SCIP updates without any funding to accomplish same.*

State and Local Implementation Grant Activities

1. 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?

Response: *For the most part, the Interoperable Emergency Communications Grant Program (IECGP) worked well. It offered significant latitude to states insofar as where their communications investments were made. In Alaska, where the SCIP specifically embraces an emphasis on improving first responder communications in underserved (rural) communities, AKICC (the body that advises the Statewide Interoperability Coordinator (SWIC)) was able to establish consensus regarding which projects would be funded under IECGP.*

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

Response: *All of the above should be allowed for grant funding. Some states may have already developed capabilities to begin the PSBN planning process, but for those who have not, the prospect is daunting. It seems clear that at this point, Alaska will need to establish a PSBN office with a number of full time staff. Additionally, there will be needs to hire consultants, engineers, project management experts, and others to work on specific phases of the PSBN effort.*