State of Georgia's Response to NTIA RFI

The Georgia Department of Public Safety(GDPS) and Georgia Technology Authority(GTA) submits the following responses to the Request for Information (RFI) released by the National Telecommunications and Information Administration (NTIA) relating to the development of the state and local grant implementation program pursuant to the Middle Class Tax Relief and Job Creation Act of 2012 ("ACT"). Responses are in red and follow each of the questions.

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 buildout; (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?

The Statewide Communication Interoperability Plan(SCIP) and interoperability governance must be reviewed and updated prior to consulting with FirstNet. The SCIP is a strategic planning document and serves as the operational blueprint for the conceptualization, procurement, implementation, and usage of interoperable communications for every State. It is an invaluable resource that should be used by the State and FirstNet in planning communications interoperability.

Very few, if any, States or locals have the staff and technical expertise to manage a project of this size, complexity and importance on a full time basis. Hiring a Consultant/Project Manager prior to meeting with FirstNet should be a top priority for any organization taking on this responsibility. A Consultant/Project Manager will minimize the State's risks, provide continuity and insure the ultimate success of this project.

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

    States must immediately compile the technical and tactical assets of local providers and contractors that are utilized for the design, development, deployment and operations of wireless broadband networks. States must also compile a listing of internal State resources and entities that will require access to the PSBN. This can be accomplished by following steps:

        1. Identification and assessment of available resources and infrastructure to facilitate the development of the State PSBN

2. *An assessment and evaluation of:*

   a) *Wireless broadband service provisioning options and platforms including technical performance and review of current and proposed commercial deployments providing similar services.*

   b) *Mapping data compiled from Georgia's State Broadband Initiative(SBI)*

   c) *Current industry-wide trend factors that would support the potential success of various technologies, application and potential business models.*

   d) *Service providers currently or potentially providing services in the State that could support the development and operations of the State PSBN including:*

      1) *A complete schedule of all LTE license holders and other service providers.*

      2) *An evaluation of the services each LTE license holder and other service providers currently or potentially provide in the State*

      3) *A review of strategic plans being developed by LTE license holders and other service providers in the State.*

      4) *Assessment and review of potential partnering opportunities with service providers and LTE license holders available to the State associated with the development of the PSBN.*

   e) *Training requirements for local and State users*

   f) *Priority access at the national, State and local level*

3. *Develop a Financial and Business Model*

   a) *Validate service areas assumptions*

   b) *Assess Sites and Backhaul options*

   c) *Data services capacity and service provisioning costs*

   d) *Capital and Operating budget*

e) *Broadband Network Equipment Cost Details*

f) *Additional equipment and provisioning elements*

g) *Project Capitalization*

h) *Commercial Opportunity Evaluation and Structure*

i) *Sustainability Plan*

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

All the above planning costs associated with the State PSBN must be covered by the State and Local Implementation grant program.

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?

In Georgia, it would be chairperson of the SIEC. It should vary for each State.

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)?

Under Georgia's SIEC governance the following entities will be represented:

Governor of the State of Georgia
Georgia Department of Public Safety
Georgia Emergency Management Agency
Georgia Bureau of Investigation
Georgia Department of Correction
Georgia Forestry Commission
Georgia Department of Administrative Services
Georgia Office of Planning and Budget
Georgia Department of Natural Resources
Georgia Chief Information Officer
Georgia Sheriff's Association
Georgia Fire Chiefs Association

Georgia Police Chiefs Association
Georgia Association of Emergency Medical Services
Georgia SWIC

SIEC's Working and Technical Sub-Committees include representatives from:

Georgia Technology Authority
State E911 Coordinator
County and Cities
Federal Agencies
Vendor Community
Georgia Interoperability Network(GIN) Administrator
Georgia APCO Frequency Coordinator
Consultant/PM

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

In Georgia, local entities are involve at the executive level of SIEC through the various local public safety associations that include Georgia Sheriff's Association, Georgia Fire Chiefs Association, Georgia Police Chiefs Association and Georgia Association of Emergency Medical Services. Public information plans should identify all the digital and print media used to distribute information concerning all SIEC activities.

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

In Georgia, there are no federally recognized tribal entities. And if any did exist, tribal entities would hold equal representation as to all State entities.

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?

Local and tribal public safety entities should be represented on the SIEC and on each of SIEC's sub-committees. Public notices should be made of all SIEC planning meetings and should be held at various locations throughout the State.

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?

In Georgia, all the above public safety disciplines are represented on the SIEC. See the above response to question 2e.

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?

Georgia's intrastate regions are based on the eight regions established by the Georgia Emergency Management Agency(GEMA). Interstate regions are based on Federal Emergency Management Agency's(FEMA) 10 regions. Both entities would be represented on the SIEC.

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

Federal public safety and emergency responder agencies should be invited and encouraged to attend all SIEC meetings.

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?

This would be implemented under the 'Identification and assessment of available resources and infrastructure" planning phase. See the above response to question 1a. There are multiple public and private databases that this information can be extracted from but some of this data will also have to validated by conducting on-site visits.

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?

It is essential to its success that FirstNet provide the framework and standards to which States can be executed on. FirstNet would dictate the governance, procedures and templates to execute on. States would then adopt those standards and procedures, and create the polices necessary to implement them.

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?

This could be a time consuming activity depending upon what information is already on-hand, additional information needed and the resources available to collect it. Georgia's best estimate would be from 4 to 5 months.

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?

In Georgia, the SIGB is being restructured under a SIEC type of organization. The Governor is expected to sign an executive order in June 2012, creating the new SIEC organization. Under the new SIEC, both voice and broadband interoperability will be addressed, and the SIEC will be responsible for the planning, deployment and operation of the State's PSBN.

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?

Georgia is restructuring it's SIGB and interoperability governance to address voice and broadband interoperability.

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?

Under Georgia's new SIEC, the State PSBN needs and requirements will be addressed.

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?

FirstNet should initiate the framework and guidelines for a national PSBN that will envelop the SCIP. Those plans will describe the overall strategy and integration model that the States can centralize their existing infrastructure under.

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

States will need to seek SIEC/SIGB approval, secure funding to update their SCIP (including broadband), establish a SCIP Working Group, and submit final draft of SCIP to SIEC/SIGB for finally approval.

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?

Through public/private partnerships maintained at the State level and supported by FirstNet will insure the solid future investment into standing 10-20 yr public/private partnerships.

    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?

FirstNet, the State and local jurisdictions need to adopt and use ANSI/TIA 222 Rev G Standard "Structural Standard for Antenna Supporting Structures and Antennas" to determine the suitability of any tower structure that will be integrated into the PSBN.

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

Georgia's technical resources are being pulled from multiple agencies that have extensive experience in the deployment of statewide and regional systems. Key personnel who were involved in the acquisition, deployment and operations of the Georgia Interoperability Network(GIN) are now part of the SIEC Technical and Working Sub-committees. GIN is a statewide gateway system that connects over 190 PSAPs that have disparate radio systems into a statewide IP network. This was a collaborative effort that was led by the Georgia Emergency Management (GEMA) and GDPS, and included

GTA and Georgia Tech Research Institute(GTRI). Technical evaluators who were involved in the Department of Homeland Security's (DHS) Border Interoperability Demonstration Project(BIDP), Public Safety Interoperable Communications(PSIC) and Broadband Technology Opportunities Program(BTOP) are also members of SIEC sub-committees involve in the State's PSBN.

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

Utilities companies like gas, electric, cable TV, telephone and fiber network carriers will play a key role in providing broadband serve in Georgia's rural areas. Georgia believes cooperation from the utilities will be critical to the success of Georgia's PSBN. This can be accomplished by creating private/public partnerships with Georgia's utilities companies.

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?

Yes, NTIA needs to play a supportive role in the formation and use of public/private partnerships. This can done by creating financial and business models, and public/private partnership templates that could be used by the States.

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 the national PSBN architecture and interoperability technical standards are known, Georgia may develop a plan to integrate the State's PSBN with the national PSBN.

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, a key factor in establishing a clearinghouse would be the creation of a centralized GIS database that would be used to identify and track all assets and resources in Georgia. This would be invaluable tool that could be used for planning, deployment and leveraging any of the State's existing assets and resources.

b.   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 following are some very common best practices that are frequently overlooked and need to be emphasized:

> *- Review and understand the grant agreement and restrictions*
> *- Establish a grant file to collect all related documentation*
> *- Understand the reporting and audit requirements*

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

Planning, Procurement, Project Management, Design, Implementation, QC Testing, Data Collection and Analysis, training, and coordination

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)?

Personnel, planning meetings, development/upgrades of plans, assessments, ANSI/TIA Standards, travel to and from meetings, consultation services and printing

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

Yes

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, a State PSBN Project/Program Director and Training Coordinator should be funded through the planning and implementation phase of the project.

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

NTIA should emphasize the role of the state in all grants, whether local or statewide, and require that planning activities have a goal of 100% coverage of the population in their geographic boundaries with justification provided by grant recipients where coverage is not feasible.

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?

Under ARRA, NTIA has mechanisms to discourage "redlining" and encourage service throughout a geographic area at the census block level. While it may appear attractive to create a formula to encourage deployment across a wide range of areas, we believe that the governance team within the local and state implementation entity is best suited to make those nuanced tradeoffs without restriction subject to review and acceptance by NTIA or FirstNet.

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?

    Yes. Some of Georgia's SBI teams may be better suited to the public safety work than others. SBI teams vary widely in their staff backgrounds and focus areas. Some are more heavily skewed towards GIS, some more towards telecom, and some more towards outreach and the community. We believe each SBI grantee should review the role it feels it can play with their federal program officer, publish an agreed upon value proposition, and submit their value proposition to the State's PSBN project lead agency GDPS.

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

    At a minimum, these SBI entities have substantial GIS information on assets, coverage, and demand that will be invaluable in the planning of these projects. Some SBI entities are also centers of expertise on telecom matters and can play a deep role in the planning and deployment of any network. Georgia Technology Authority is one such designated entity.

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

See response to question 13a

a. Are there data that the States and local jurisdictions should deliver to document the outcomes of the grant program?

Yes. Metrics should be provided at the completion of planning with test results against the planned metrics included to document final outcomes. The metrics should include:

- Network coverage and performance metrics including availability.
- Number and types of users
- Applications deployed and their benefits
- Qualitative summary of risks and mitigation factors

b. If so, how should they be measured?

Implementation teams should gather the above metrics from network providers and integrators and conduct independent third party verification activities as well.

c. Who should collect this information and in what format?

The implementation team has ultimate responsibility and should be able to source the data however they see fit, subject to review and acceptance by the State and FirstNet.

d. What data already exist and what new data could be gathered as part of the program?

Data already exist in CASM, FCC's ULS and in various OEC tools. Additional data will also need to be gathered from Georgia's BTOP, PSIC, SBI, GIN, LETPP, UASI and COPs projects.

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?

Yes

Are there other programs or tools that should be considered?

Yes, State BTOP, PSIC, SBI, GIN, UASI, LETPP and COPs projects.

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?

States should guide the distribution of grant funds within their states and allocations to each state should be based upon population, geographic area, critical infrastructure and risk profile.

    a. Should NTIA consider allocating the grant funds based on population?

    Yes, see the above response to question 15.

    b. What other targeted allocation methods might be appropriate to use?

    See the above response to question 15.

    c. Should NTIA consider phasing the distribution of grant funds in the new program?

    Yes, GTA's SBI experience has proven that vendor costs decrease substantially over time as a federal program matures. For example, broadband mapping costs have decreased to a factor of two to four depending on the vendor. Due to the innovative nature of the program and the limited funds, we recommend a phase implementation.

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 Georgia, the State's CIO and CTO office comes under Georgia Technology Authority(GTA). GTA will play a key role in supporting SIEC and GDPS efforts to plan, design and implement the State's PSBN. GTA will provide its' technical expertise; governance development; technical analysis; strategic planning; GIS mapping data and analysis; procurement; program, vendor and spectrum management.

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?

Waiver requests should be reviewed very carefully. GTA experience is that a minimum in-kind contribution via personnel, facilities and other items can amount to significant contributions and demonstrate the commitment of the recipient. NTIA may take on additional, unnecessary risks by granting waivers, particularly to local entities.

High federal utilization of the State's PSBN is expected and should be factor when considering the state's matching fund requirement.

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?

Public interest factors:
- Whether applicant is a key State stakeholder?
- Does the applicant have the support of the SIEC?

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.