**National Telecommunications and Information Administration**
**Request for Information on the Development of the State and Local Implementation Grant**
**Program for the Nationwide Public Safety Broadband Network**
**Docket No. 120509050-1050-01**

**Comments of the Mississippi Wireless Communication Commission on behalf of the**
**State Of Mississippi**

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The Mississippi Wireless Communication Commission (MWCC), on behalf of the State

of Mississippi (Mississippi) as a Waiver Recipient and as a National Telecommunications and

Information Administration (NTIA) Broadband Technologies Opportunities Program (BTOP)

Grant Recipient submits these Comments in response to NTIA's Request for Information

regarding the Development of the State and Local Implementation Grant Program (S&LIGP) for

the Nationwide Public Safety Broadband Network (PSBN).

**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?**

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

Since the allocation of funds for the First Responder Network Authority (FirstNet) will

be insufficient to build the entire nationwide network, and since NTIA has no financial analysis

on the cost of operating the network or services to the States, FirstNet and NTIA should gather information that will reduce the cost of the network to the States. For States and jurisdictions like Mississippi, where there has already been a significant expenditure of federal funding through NTIA's BTOP grants, as well as State of Mississippi appropriations and contractual commitments, FirstNet should work to incorporate these assets to reduce the cost and speed deployment and use of the network rather than blocking the BTOP grants and placing the State of Mississippi in jeopardy of contractual disputes and lawsuits. States should compile the following data for the consultation process:

- Identification of existing State owned or leased sites, other wireless sites, categorized as urban and rural, supporting public safety communications for State, County, Local and Tribal public safety agencies that could support the Statewide Radio Access Network (RAN)

- Identification of existing backhaul capacity from existing wireless sites; detailed backhaul architecture and capacity plan

- Network coverage requirements within the State based on population and critical coverage locations falling outside of population centers as reflected in 2010 census data

- Detailed site surveys of primary candidate sites including facilities assessment (e.g., towers, electrical service, space, etc.), existing backhaul service and site upgrades required to bring to compliance for Long Term Evolution (LTE) network use including hardening, security, reliability and resiliency requirements

- Current broadband applications and desired broadband applications and footprint

- Locations of PSAP facilities within the State and upgrades required at PSAP locations to support LTE Network connectivity and use

- The description of the governmental body to oversee the development of the Statewide First Responder RAN (or in other states, how that governance body will be established)

- Costs or costs factors and comparison in the operation of the network

- Amounts already spent towards a compatible LTE network

- List of state owned sites which have backup power and are hardened

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

Creating and compiling this data should be covered by the grant program, but states should be allowed to work on this effort with existing grants and funding and save grant money for more complex tasks (e.g., designing the network and building a decision framework/diagnostic analysis). Grant funding should also be used to provide the support for dedicated state staff and consultants to develop essential data for FirstNet as well as funding to support outreach and education efforts directly related to the PSBN.

**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?**

The MWCC (www.wcc.ms.gov) is an existing governmental body representing the stakeholders of public safety and is overseeing the nearly complete build-out of the Mississippi Wireless Information Network (MSWIN) P-25 Land Mobile Radio (LMR) network and the LTE network. Currently, the deployment of the State's LTE network has been halted by NTIA through partial suspension on May 11, 2012. The members of the MWCC represent the broad interests of the state and local public safety community. The Statewide Interoperability Coordinator (SWIC) is also located at the MWCC. Each State should identify or establish an organization that has purview over state public safety broadband networks. In the absence of

such an organization, the State CIO organization should be designated due to the distinct IT nature of the network.

**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 Mississippi Legislature created the MWCC in 2005 just before Hurricane Katrina. The MWCC is governed by a Commission composed of representatives of both state and local interests which includes the MS Department of Transportation, MS Department of Public Safety, MS Department of Health, MS Department of Information Technology Services, MS Emergency Management Association, MS Office of Homeland Security, MS Sheriff's Association, MS Association of Supervisor's, MS Municipal Association, MS Association of Police Chiefs, MS Association of Fire Chiefs, MS Highway Safety Patrol, MS Department of Corrections, MS National Guard, MS Department of Environmental Quality, and the MS Wildlife, Fisheries and Parks.

The legislation also established an advisory board which is comprised of the Chairman and Vice-Chairman of the Senate Energy Committee, the Chairman and Vice-Chairman of the House of Representatives Public Utilities Committee, the Chairman of the Senate Appropriations Committee, the Chairman of the House of Representatives Appropriations Committee, the Chairman of the Senate Finance Committee and the Chairman of the House of Representatives Ways and Means Committee.

The MWCC reflects the stakeholders at the State and local levels as well as the State CIO, the State Emergency Management Official, the SWIC and Organizations representing Sheriffs, Fire, Police and EMS agencies.

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

In Mississippi, the MWCC incorporates local entities, public safety organizations and other stakeholders. States should be allowed the latitude to involve local entities by this and other methods. Participation by local entities can be facilitated through a properly constituted governance body, similar to the MWCC, and through stakeholder meetings and a process for input.

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

The MWCC has included, through its Governance Committee, tribal, county and local public safety representatives and will continue to do so as it gathers necessary information for consultation with FirstNet.

These initiatives can include education materials, public hearings, and web-based updates/resource center/Q&A forum along with additional visits to tribal locations and meetings with tribal councils.

**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?**

Mississippi recognizes the need to ensure the participation of local and tribal public safety entities to assemble a complete set of requirements for a statewide RAN and promote adoption of the network. The S&LIGP should require the grant applicant to disclose the methodology that will be used to solicit the participation of local and tribal public safety entities in the planning effort.

**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?**

Mississippi recognizes the need to ensure the participation of public safety disciplines statewide to assemble a complete set of requirements for a statewide RAN and promote adoption of the network. The S&LIGP should require the grant applicant to disclose the methodology that will be used to solicit the participation of public safety disciplines in the planning effort.

**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?**

The grant program should not attempt to define "regional" in the context of this network. The States can choose to recognize existing intrastate regional consortiums in their planning approach just as they will recognize tribal, county and local public safety entities and disciplines. The State of Mississippi, as a 700MHz waiver recipient, has done a great deal of planning and deployment through its BTOP grant until its work was partially suspended by NTIA on May 11, 2012. Mississippi's efforts have spurred interest from surrounding states. These interests are in partnering with Mississippi and using its core. Mississippi's existing core can be integrated into both FirstNet's network and governance structure seamlessly and without any adverse effect on governance or interoperability. Since NTIA and FirstNet will take two years or more to start significant deployments, NTIA should shift its position to promote compatible deployments and regional development with the requirement that the state and regional networks will be interoperable and will comply with FirstNet operations when FirstNet is able to deploy. Such a requirement will reduce the cost of the network, promote regionalism, and speed up deployment. If NTIA does not promote Mississippi and others to move forward, NTIA should be held responsible for under-funding of the network and/or face other legal ramifications.

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

Mississippi recognizes the benefit of sharing interoperable communications with Federal users within the State. The MWCC has relationships and user agreements in place with numerous federal entities that utilize the statewide LMR system. These include the Federal Bureau of Investigations, U.S. Marshall Service, the U.S. Fish and Wildlife Service, U.S. Coast Guard, Drug Enforcement Administration and the Army National Guard. The MWCC also recognized that some of the aforementioned users may have particular data security requirements that differ from those needed by the majority of the users of the network. As a result, The S&LIGP should require the grant applicant to disclose the methodology that will be used to solicit the participation of Federal users and entities within the state in this planning effort. With regard to collaboration, the MWCC can also ensure Federal representation on the governance board as an ex-officio member(s).

States have the opportunity to consider treating Federal entities like any other governmental entity for the purposes of planning. Although 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.

**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 is a significant data collection and assessment effort. Such an effort will require the use of resources beyond those that currently exist at the State levels. The S&LIGP can be used to fund that data collection and assessment effort in addition to the other tasks required to establish the State's network requirements.

State responses should be comprehensive and provide detail around the inventory process (towers, site types, available circuits, data centers, etc.), which is critical for success. States need to clarify where they do not have the internal capacity to handle this effort and will require external resources and the expected timeframe for additional support, assuming these are temporary roles.

**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?**

FirstNet should designate a standard reporting format for quantitative data. However, States should be allowed the latitude to describe particularities and significant factors which may not be the same in other areas. To ensure the effectiveness of the planning process and the usefulness of the resulting planning information, the program will require the granting agency to establish consistent planning goals, objectives and guidelines. States should be accountable for the outcome, not the process they use to get there. It would also be helpful if NTIA established protocols for all fiber and tower infrastructure companies to provide their site information and fiber locations to the States.

Any standards and processes established by FirstNet should be reviewed carefully to ensure that rural states like Mississippi are not disadvantaged. Population numbers should be only one of the factors used to measure. Public safety networks are traditionally built based on geographic coverage as there is no way to predict where the next disaster or emergency will

occur.  These networks should consider areas where people "live, work, and play." Other factors could include key state assets, fluid movements of people, public safety, future population growth, and other stakeholders (public/private partnerships or PPP).

**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?**

Gathering efforts can take up to six months, such efforts might include education and outreach.  States which are able to respond more quickly should be incentivized to do so by providing the opportunity to move forward with the network in the first increment.  FirstNet will not be built all at once, and the phased construction should take into account those States which can activate the PSBN earliest.  The NTIA BTOP grant to Mississippi and NTIA's relentless pushing of Mississippi to deploy LTE equipment and the broadband network has resulted in Mississippi's position to be able to start using the PSBN much sooner than FirstNet's ability to deploy.  NTIA should take advantage of the progress Mississippi has made and should not deny the people of Mississippi the benefits of the PSBN for two or more years while its LTE equipment has already been deployed and is in place at NTIA's insistence.  If NTIA and FirstNet do not allow Mississippi to proceed, it is a waste of federal and Mississippi tax dollars which is a detriment to job creation in Mississippi and an injury to the safety of its citizens.

**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?**

When the Mississippi legislature created the MWCC, its origin evolved from the SIEC governance structure. In 2007, the MWCC began the build-out of its statewide P25 700 MHz LMR public safety network (MSWIN) which will be fully deployed by late fall 2012. Mississippi has leveraged the assets of the MSWIN LMR network which greatly reduces deployment cost and makes possible the construction of the Mississippi LTE network. The existing infrastructure and experience that has been developed by the MWCC over the past seven years proved to be invaluable as the State set forth the planning and deployment of its LTE network.

**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?**

The MWCC and the SWIC, which is located at the MWCC, has been planning and planning for the deployment of a LTE network for the past four years.

**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?**

Yes. The MWCC is overseeing the deployment of both the statewide LMR and LTE wireless communication systems. The MWCC is an existing governance structure with:

- Cross functional, representative body representing, local, State and Federal users and tribal representation by committee participation

- Experience in large scale project acquisition

- Existing governance body with defined leadership roles, functions and responsibilities

- Experience managing large contracts with both public and private network vendors

- Proven track record of delivering wireless solutions for the Mississippi government users

**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?**

The MWCC worked with many other state agencies to develop the existing SCIP. This will serve as useful reference documents that will be updated to include the use of this network. At some point in the process, prioritization decisions will need to be made to complete the plan. At that point, PS-related plans like those from the SCIP will likely rank higher than most others.

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

States need the latitude to use existing structures. The MWCC is responsible for maintaining the SCIP and ensuring that updates occur to include broadband. Other States will want to establish or coordinate through a State CIO or other state broadband public safety governance board.

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

Yes. Each State should be responsible for adjusting the governance structure to include broadband, ensuring the State has maximum latitude to operate, but it should be incentivized to include additional costs in the new program. However, States that have achieved these tasks should be allowed to use funding to accomplish more complex tasks.

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

Funding for the implementation and planning of FirstNet should be the highest priority for the grant program. Money should be dedicated to future changes, not sustaining current structures. However, if grant funds are available to support governance and planning, then it would be a short term benefit for States to have access to those funds.

## 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?**

**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?**

Mississippi occupies a special situation, since it was an early 700MHz waiver recipient and NTIA BTOP grantee. As such, a huge investment has been made in equipment that was specifically acquired for integration into a nationwide public safety broadband network. NTIA and FirstNet must take this into account. Other assets of the State of Mississippi include the statewide P-25 700 MHz LMR system which was leveraged to construct the Mississippi LTE network. Additional State, local and commercial utility assets have also been assessed for suitability.

Once the State determines the coverage and availability requirements of the network, they can begin to assess whether the physical locations and facilities at existing sites align with these network requirements. Moreover, States can even work with external vendors to determine viability of future use. Following that determination a further assessment of required site upgrades and acquisitions can begin. This effort presupposes that a preliminary RAN design has been completed along with general site specific requirements including towers, power, backhaul and shelter space, etc.

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

The MWCC is currently providing resources as needed through existing personnel and contractual services. This includes the planning, implementation and build-out of the Mississippi LTE network. However, ongoing dedicated funding and staff for this project will be an absolute necessity and should be funded through the grant.

NTIA/FirstNet should define the levels of granularity it expects from the States, realizing that while deeper granularity provides a number of benefits, it also requires higher costs.

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

Utilities, medical and educational institutions, transportation agencies, and others should be included in the data collection and planning, even if participation has not been settled because these entities have already begun planning for their future needs. Such relationships will be critically important to the success of the PSBN as infrastructure providers and users of the system. Several of these third party entities have already expressed a strong interest in using the Mississippi LTE network. PPP discussions and exploration should start early in the process since they will likely have long lead time requirements.

FirstNet should establish clear guidelines on how States can establish PPPs within the state when FirstNet, and not the State, is the network operator. Moreover, guidelines on who States can and cannot contact (e.g., PPPs) and what they can and cannot do should be set. Finally, the regulatory question on who (e.g., hospitals, utilities, etc.) is able to use the public spectrum should clearly be defined.

**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 formation and use of PPPs was contemplated by the legislation. However, the legislation was not specific in identifying what private entities might qualify as partners for the PSBN. NTIA should encourage planning for the use of PPPs. NTIA should not discourage PPPs by placing restrictions in the S&LIGP guidelines. The States can plan for PPPs and take their cases for Public/Private Partnerships to the FirstNet Board.

**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 gets incorporated into this model?**

**a. How would States plan for this integration?**

Each State should be recognized as a stakeholder in any RFP process involving that particular State, provided with information and consultation to ensure that the State is comfortable that the build-out in its area meets the needs of the State. If NTIA/FirstNet fails to fully incorporate each State as a stakeholder or to keep that State fully informed, it increases the likelihood that the State will reject federal control and will opt out, or more significantly, will simply not use FirstNet or the spectrum at all. Each State should be allowed to establish temporary/full-time positions to lead coordination even if it exists only in the RFP phase and is reinstituted in the build phase (e.g., site database for asset contacts across state). States should also establish a head who will serve as point of contact between vendors and the clearinghouse.

**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?**

States could serve as a clearinghouse for access to its own public infrastructure and may be able to develop standards for regional, tribal and local participation. These entities could make access to their public infrastructure available under agreed terms and conditions as long as they are fairly compensated.

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

Yes. The grant should include the cost of setting up the clearinghouse structure at the State-level. This is anticipated to be a temporary role so estimated costs should be a finite portion of the grant.

## 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?**

NTIA should honor its commitments in its grant programs. The reversal in midstream of the BTOP grants has placed State contracts at jeopardy, increasing the litigation risk for the States without recourse to NTIA. There is no technological reason why the BTOP grantees such as Mississippi should not proceed, since the Mississippi network can be fully and completely integrated. The BTOP process benefited with strong technical assistance from the FCC, and this should be facilitated. Some of the best practices include:

- Clarity and consistency of guidelines and expectations

- Establishment of a management reserve fund (e.g., $15-20M extra for States to petition on for unique needs)

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

The SLIGP should allow for the following activities:

- Engineering and strategic planning

- Establishing the network governance framework

- Creation of the Statewide Out-Reach Program of communication, education, information dissemination and collection

- Project website

- Stakeholder meetings and webinars

- Preliminary RAN network engineering/coverage requirements

- Statewide telecom/radio site database, including point of contact and access

- Financial analyses of funding and operating models based on estimated usage

- Review of State regulations relating to Federal/State run network operating models and PPP formation

- Training on LTE technology and RAN networks

- Inventory planning

- Cost modeling and financial analysis

- Analysis of previously installed LTE equipment and core equipment in the network or for a regional application

- Review of agreements and leases for tower space

**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 the activities listed above including but not limited to personnel costs required in the planning process, environmental documentation and assessment of potential sites, planning meetings and travel costs should be eligible for funding.

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

Yes. Such data gathering should be an allowable cost and the data should also include broadband and mobile data infrastructure that the State already owns or has installed. NTIA could consider offering matching funds through grant, up to a certain limit. States will also need funding to provide the adequate staff to gather data.

**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?**

NTIA should allow the States to hire the positions they need and set out requirements; the positions can be funded as a termed employment through the grant. States should be given latitude to accomplish the job, including hiring or contracting.

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

NTIA should use as a factor the current deployment of State LTE equipment and prioritize it so that the network can be deployed quickly. Population and density should only be two factors. Disasters and emergencies can occur in rural areas such as chemical plant disasters or plane crashes. Geographic coverage must be a major factor. Many urban areas will be served because the network infrastructure already exists; FirstNet must push the PSBN into rural areas. Rural States like Mississippi should be given latitude to use various methods to reach rural areas, whether additional cell sites, mobile systems, backup systems like COWS or COLTs if they so desire.

Grant submissions should contain specific metrics and plans that demonstrate coverage requirements in rural areas. Other factors could include required services, available infrastructure, and in-car vs. in-building coverage.

**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?**

The MWCC administered the Public Safety Interoperable Communications grant established by NTIA, in consultation with the Department of Homeland Security, which assisted public safety agencies in the acquisition of, planning and coordination of, deployment of, or

training for the use of interoperable communications systems. The grant program was very successful and enabled locals to acquire the equipment necessary for statewide interoperable communications. The Rural Development Telecommunications Programs offered by USDA may also provide some best practices to be included in the S&LIGP.

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

In Mississippi, the SBI state designated entity is the Office of the Governor. The MWCC and the Office of the Governor work closely together to ensure that the build-out of the Mississippi LTE Network is allowed to continue and is successfully implemented.

**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?**

States should provide measurable key outputs aligned to the answers provided to the above question, "What data should States compile for the consultation process with FirstNet?" As previously mentioned, NTIA and FirstNet should clearly define the levels of granularity it expects from the States, realizing that while deeper granularity provides a number of benefits, it also requires more costs.

**b. If so, how should they be measured?**

Guidelines and measurements should be outcome-driven. Examples include full-site inventory that has associated contact people, fiber connectivity, backhaul; solid governance structure with roles and responsibilities; and service descriptions. Measurement of the State's

responses should be based on the quality of data that was originally requested.

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

The MWCC has worked with State and local entities to collect most of the data referenced above which has been entered into the Communications Assets Survey and Mapping Tool (CASM).

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

All of the above referenced data has been collected by the MWCC with the exception of available fiber backhaul connectivity.

**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?**

States should be encouraged, not mandated, to use tools/support as a validation mechanism for the data collected by the State. The MWCC has found the CASM tool to be useful in the past.

**Are there other programs or tools that should be considered?**

A GIS Mapping Tool could be used with this effort and should be made available the States by NTIA or as part of the grant.

**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?**

Population and population density are only two factors. However, population alone will not serve the legislation's goal of bringing the network to rural and non-urban areas, which are often lightly populated. Since FirstNet is underfunded and NTIA does not have any cost modeling or financial analysis available on its total cost of construction, maintenance and operation, it is incumbent upon NTIA to ensure that a divide does not arise between densely populated areas and rural areas. Construction of the network will be phased, and a combination of rural and urban areas should be in the first phase. Accordingly, planning grants should be made early to those who are most ready to move forward, such as Mississippi. NTIA should change its position that early deployers should stop, since there is no technological reason why a State or regional system cannot be fully integrated into FirstNet. Other significant factors follow in the response to the next question.

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

- Geographic area requiring network coverage

- Highway miles (input from State Dept. of Transportation)

- Combination of population / highway miles

- Population density

- Number of sites

- Uncovered rural broadband customers

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

Yes, due to the NTIA BTOP grant, Mississippi and perhaps a few other jurisdictions have a great deal of planning already done and information gathered. In order to expedite deployment, grants should be prioritized to those most ready to respond and initial construction should go to a variety of States and areas. Phasing may be appropriate depending upon the

expected performance period of the planning effort as well as construction.

## 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?**

The MWCC should take the lead role in the S&LIGP. The State CIO sits on the Governance Board of the MWCC and the Department of Information Technology Services handles all procurement and contracting activities for the MWCC. The network being considered is a highly complex IT network with risks and challenges far different than those being dealt within the operation of today's existing public safety communications systems. The emphasis should be on operation of the network and not on who uses the network only. Consequently, organizations like the MWCC should be used since it has technical competence plus public safety and local representation. The MWCC should also be responsible for coordinating with PPPs.

The State will establish a requirements gathering methodology that capitalizes on the knowledge and expertise of all stakeholders.

**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?**

The State of Mississippi has already contributed money, time, assets and other efforts in determining State public safety broadband needs and in planning for the PBSN since it has taken a very forward leaning position with the 700MHz waiver and the BTOP grant. NTIA should take these into account and other States and jurisdictions in similar situations should, too. If

there must be a matching amount from the State, the NTIA should accept the valuation of in-kind services toward those matching funds.

**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?**

NTIA should take into account funds and other resources already expended for LTE equipment and other PSBN assets that can be incorporated into FirstNet.

**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.**

The NTIA RFI conflates the Act's mandate of single network architecture with a single network. This is a technologically naive position that is driving the waste of millions of dollars of BTOP and State funding not to mention the delay in the deployment of a public safety broadband capability that could enhance the safety of the public over the next two years. It is understood that NTIA wants to ensure federal control of the network, and the FirstNet authority will have that, but the architecture can be 'single' even as BTOP recipients move forward. Much of the BTOP grants are now "stranded" costs, all of which are entirely compatible with a nationwide LTE public safety network. Furthermore, Mississippi has received an indemnification letter from its vendor ensuring compliance with any standards set forth by FirstNet. The S&LIGP should take the position of Mississippi and other similarly situated jurisdictions into account and allow them to move forward under the mandate to integrate into the NPSBN.

NTIA should provide clear direction to States through the S&LIGP. These should lead to clear responses from States and allow reasonable comparisons to be made. Ultimately, NTIA

should accelerate grant distribution as much as possible and seek clearly defined outputs or

outcomes from the States.

Respectfully Submitted,

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