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June 15, 2012

The Honorable Lawrence E. Strickling  
Assistant Secretary for Communications and Information  
National Telecommunications and Information Administration  
United States Department of Commerce  
1401 Constitution Avenue NW, Room 4898  
Washington, DC 20230

Re: FR Doc. 2012-11818 Filed 5-15-12; 8:45 am, Docket No: 120509050-1050-01

Dear Mr. Strickling:

On behalf of the members of the Washington State Interoperability Executive Committee, I am writing to provide information under the National Telecommunications and Information Administration's (NTIA) Request for Information (RFI) seeking public comment on issues relating to the development of the State and Local Implementation Grant Program for the Nationwide Public Safety Broadband Network (NPSBN).

On May 31, 2012, the Washington State SIEC voted to express support for the mandatory requirements and requirements recommended for consideration by FirstNet contained in the *Recommended Minimum Technical Requirements to Ensure Nationwide Interoperability for the Nationwide Public Safety Broadband Network* dated May 22, 2012. The Washington SIEC supports the 46 mandatory requirements as a reasonable technical framework to ensure a nationwide level of interoperability for the NPSBN. Of particular interest are the following mandatory requirements:

- [9] Any sharing agreement that FirstNet enters into SHALL implement network sharing according to 3GPP TS 23.251 and SHALL NOT impact public safety operations.
- [23] The equipment comprising the NPSBN SHALL provide backwards compatibility of interfaces, from time of deprecation, for a minimum of two full major release/upgrades of the network. This requirement may be waived (i.e., interface obsolescence accelerated) if FirstNet can ascertain from the user community that there are no dependencies on a given interface.

- [30] The NPSBN SHALL provide the ability for national, regional, and local applications to dynamically change a UE's prioritization and QoS using the 3GPP '\_Rx' interface.
- [43] In order to ensure secure and interoperable interfaces between the NPSBN and external elements (e.g. all SGi, Rx and Srvs services as shown in Figure 2), these interfaces SHALL be protected with a FirstNet-approved security mechanism.
- [38] The NPSBN SHALL use a nationwide common security profile for user plane and control plane traffic between UEs, eNBs and MMEs, in accordance with 3GPP LTE Network Access Domain protocols. The profile SHALL be based on 3GPP TS 33.401, and will be determined by FirstNet based on a system design and other considerations as it deals with evolving cyber threats. As a minimum, the profile SHALL include specification of ciphering algorithms (for example, use of AES-128 vs. SNOW 3G).

The Washington State SIEC support for the mandatory requirements also assumes that FirstNet and NTIA put into place a consistent and thoughtful system of governance, consultation, resource allocation and planning conditions as part of the State and Local Implementation Grant Program. The SIEC believes that in order to successfully implement and sustain an operational NPSBN that there must be strong support and clear alignment between the technical and governance requirements. Specifically, the Washington State SIEC provides the following comments regarding the grant program:

- The State and Local Implementation Grant Program should leverage, support, and provide resources to obtain complete data collection, documentation, and technical analysis for each state. This work effort must focus on ensuring backwards compatibility of interfaces with the NPSBN. FirstNet and the grant program should seek to identify and inventory any existing regional organization and infrastructure that provides public safety communications services and 700 MHz or 800 MHz regional trunked public safety networks.
- States should be allowed to use the grant funds to establish structures and mechanisms to collect as much infrastructure-specific data as possible from publicly and privately owned entities. Grant resources should specifically enable work with the major local governments and agencies that own infrastructure in order to simplify FirstNet's ability to leverage this data in its negotiations to seek public/private partnerships to implement the NPSBN. The SIEC envisions continued collaboration between entities, such as an SIEC, with the state Broadband Office. It should be expected that the State Broadband Initiative program be available to provide consistent tools, relationships and experience to collect, verify and display FirstNet service and infrastructure data in concert with data concerning commercial networks.

- If sufficient funding is available, the funding of staff positions that manage communications interoperability programs such as Statewide Interoperability Coordinators staff should be an allowable cost under the grant program when the job duties specifically relate to working with FirstNet and developing plans, designs and implementing the NPSBN.
- The consultation process used by the State and Local Implementation Grant Program should be oriented to take advantage of existing and statutory recognized multi-disciplinary and multi-jurisdictional entities such as a state SIEC. The entity should clearly document how the state will use this structure to work with FirstNet. Ideally, the governance structures should include local representatives of first responders but also elected officials, Chief Information Officers, public safety communications professionals, Public Safety Answering Points, emergency operations centers, public works/transportation/utilities and other local government and tribal responders and infrastructure owners. In determining governance communication structures, states should be encouraged to recognize any existing UASI region inside their state or adjacent to it. The consultation process shall require that these entities be positioned to validate and ensure that NPSBN sharing agreements do not impact public safety operations at the tribal, state, regional, and local levels.
- The State and Local Implementation Grant Program should support work efforts that coordinate with state and local level Chief Information Officers (CIO). This effort should focus on ensuring secure and interoperable interfaces between the NPSBN and external elements. In addition, FirstNet shall consider evolving cyber threats based on consultation with CIO's during the development of the nationwide common security profile.
- The State and Local Implementation Grant Program should support work efforts to ensure a governance structure that supports national, regional, and local applications to dynamically change end user prioritization and quality of service. It is critical that FirstNet support and enable states to work very closely with first responders, PSAPs, and local government agencies to develop and validate local end user needs and infrastructure so "buy-in" and support is achieved from future network "customers." By meeting the documented needs of local agencies, FirstNet will mitigate the risk that fewer than anticipated users will transition to the network that are required to ensure the network's usefulness and long-term sustainability.
- Funds and resources should be allocated on population and characteristics such as topography, population density, economic diversity, and the presence of tribal, maritime industry, military and federal entities and international borders. FirstNet should also work to ensure each state has the same ability to successfully participate in the NPSBN.

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The last point regarding the allocation of resources is of particular interest and concern for Washington State. The State of Washington is uniquely situated and encumbered with a confluence of several unique man-made and naturally occurring characteristics, hazards, and situations. These are well documented in the state's *Statewide Communications Interoperability Plan (SCIP)* and *Enhanced Hazard Mitigation Plan*. Resource allocation should also take into account the higher degree of planning, technology, and engineering costs associated with deploying a broadband network across a diversity of elevation changes, density and location of population centers, and general topographical and propagation limitations. In addition, resources for sustained governances becomes a more important and critical requirement when a State is a maritime entity, shares an international border, and has a strong presence of tribal, military, and federal entities such as exists in Washington State.

Thank you for the opportunity to comment on the development of the State and Local Implementation Grant Program for the NPSBN. Please feel free to contact me by email at [Doug.Mah@ofm.wa.gov](mailto:Doug.Mah@ofm.wa.gov), or calling (360)902-3574 if you have questions regarding our comments.

Sincerely,

A handwritten signature in black ink, appearing to read 'Doug Mah', with a long horizontal flourish extending to the right.

Doug Mah, Chair  
Washington State Interoperability Committee