Before the
National Telecommunications and Information Administration
and the
National Highway Traffic Safety Administration

on notice of proposed rulemaking

COMMENTS
of the
National emergency Number Association, Inc.¹

In general, NENA strongly supports all of the agencies proposals in this proceeding. We write here to address three points that we believe to be crucial to the success of this grant program: direct tribal involvement, independent verification and validation, and standards compliance.

Historically, tribal nations have been lamentably under-represented in emergency communications grant programs. In some cases, tribes have been required to apply via state governments that may not have interests aligned with those of the tribes they are assigned to represent. Moreover, many tribes face fundamentally different infrastructure, technology, and training issues than the state(s) across whose territory(s) their lands may lie. Going forward, NENA strongly supports allowing tribal nations to directly apply for grant funds under this program. Direct applications will allow tribes to tailor their requests to unique local needs, without being required to comply with state requirements that may have no applicability on tribal lands.

In addition to direct tribal applications, NENA wishes to emphasize the importance of independent verification and validation, and encourage the agencies to specifically describe this activity as an allowable and prioritized cost for grantees. Independent verification and validation (IV&V) is a testing process whereby a disinterested third party confirms that a technology service provider’s product(s)

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or service(s) both conform to the applicable specifications and standards (verification) and are fit for the intended purpose (validation). Given the complex, multi-vendor nature of NG9-1-1 deployments, IV&V will be critical to ensuring interoperability across wide-scale deployments of NG9-1-1 systems. Already, IV&V work conducted by the State of Texas has proved invaluable in identifying potential transition challenges and quantifying the additional development work that vendors may be required to complete to achieve specified levels of standards compliance and interoperability. Because NG9-1-1 systems are not “black box” products that can be implemented in a flash-cut fashion, considerations such as those identified by Texas will be invaluable to states and tribes as NG9-1-1 deployments expand and proliferate. Consequently, NENA urges the agencies to encourage applicants to include relevant IV&V work for all proposed product, service, and system purchases funded with grant monies, or to fund collaborative, multi-jurisdictional IV&V testing.

Finally, NENA applauds the agencies’ incorporation of the DHS SAFECOM grant guidance standards appendix in the proposed rules. This guidance refers back to the NHTSA-published “NG9-1-1 Standards Identification and Review,” and thereby incorporates by reference a host of standards published by NENA and others that will be directly relevant to the interoperability, security, and interconnection of deployed NG9-1-1 systems. Among these, the “Detailed Functional and Interface Specifications for the NENA i3 Solution” or simply “i3” and the “Security for Next Generation 9-1-1” or “NG-SEC” standards are of particular importance. To date, every NG9-1-1 deployment and procurement of which NENA is aware has requested, required, or received bids specifying i3 as its architecture of choice. Considering the near-unanimous support for i3 among the public safety community and industry, NENA urges the agencies to strongly favor i3-based deployments, and strongly disfavor other deployments, absent an especially-compelling justification for non-compliance, and particularized guarantees that the alternative deployment will be interworked – at the grantee’s expense or the expense of its non-compliant vendor(s) – with i3-based systems. Without such strong protections, non-interoperable systems could be deployed, leading to significant external interworking costs for all the other systems that are i3-compliant. Moreover, this approach is consistent with that adopted by DHS in backing P25-based land-mobile radio systems, and with that adopted by the FCC, Congress, and FirstNet in
backing LTE-based mobile broadband systems for public safety. Each of those approaches has been successful in reducing costs, improving interoperability, and reducing procurement overhead for public safety agencies. So that these benefits may be also be enjoyed by the 9-1-1 community, too, NENA encourages the agencies to adopt a similar approach.

Respectfully submitted,

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