

August 11, 2016

Mr. Brian E. Kamoie
Assistant Administrator
Grant Programs Directorate
Federal Emergency Management Agency
United States Department of Homeland Security
500 C Street, SW
Washington, DC 20472

Dear Mr. Brian E. Kamoie,

SAFECOM and the National Council of Statewide Interoperability Coordinators (NCSWIC) appreciate the opportunity to review the annual *SAFECOM Guidance for Emergency Communications Grants (SAFECOM Grant Guidance)*. SAFECOM and NCSWIC are pleased to find the *2016 SAFECOM Grant Guidance* now requires Department of Homeland Security (DHS) grantees to comply with Project 25 (P25) standards for land mobile radio (LMR) purchases:

“Grantees must ensure that all grant-funded equipment complies with the SAFECOM technical standards in Appendix B.” (Page 32)

[Appendix B includes Project 25 standards for LMR purchases]

The 2016 SAFECOM Grant Guidance also includes a provision allowing grantees to submit written justification for non-standards purchases:

“In the event a grantee is using Federal funds to purchase equipment that does not align with P25 standards, written justification should be provided to the grantor. Authorizing language for most emergency communications grants strongly encourages investment in standards-based equipment. Many agencies will not approve non-standards-based equipment unless there are compelling reasons for using other solutions. Funding requests by agencies to replace or add radio equipment to an existing non-P25 system (e.g., procuring new portable radios for an existing analog system) will be considered if there is a compelling reason why such equipment should be purchased and written justification of how the equipment will advance interoperability and support eventual migration to interoperable systems. Written justification should also explain how that purchase will serve the needs of the applicant better than equipment or systems that meet or exceed such standards. Absent compelling reasons for using other solutions, agencies should invest in standards-based equipment.” (Page B-4)

SAFECOM and NCSWIC believe this clause may be read to create a loophole for state and local agencies to purchase non-standard equipment, which would hinder interoperability. SAFECOM and NCSWIC believe there is a need for one consistent policy, across all grants, regarding P25. SAFECOM and NCSWIC have discussed options for improving this policy and process, and hereby submit their recommendations to DHS:

1. SAFECOM and NCSWIC recommend that compliance with P25 standards be required for *all* grantees and the language in the *2017 SAFECOM Grant Guidance* should reflect that requirement (i.e., change “should comply” to “must comply”).

2. SAFECOM and NCSWIC recommend FEMA grant staff and grant reviewers be trained and educated to identify P25 and non-P25 equipment and provided a list of P25 compliant equipment; such a list should be similar to the list developed by the Public Safety Communications Research (PSCR) Program (see: [Grant Eligible Equipment List](#)), to ensure equipment purchased with federal grant dollars is P25 compliant.
3. SAFECOM and NCSWIC recommend FEMA remind State Administrative Agencies (SAA) of these standards-related requirements, and encourage states to appoint a single point of contact (e.g., the Statewide Interoperability Coordinator [SWIC]) to review communications projects submitted for funding to ensure compliance with the technical standards in the *SAFECOM Grant Guidance* (a best practice).

SAFECOM and NCSWIC strongly believe all communications purchases should be P25 compliant (where applicable), and that waivers should be an exception, thus rarely granted. Furthermore, SAFECOM and NCSWIC believe the waiver standards should be standardized across federal departments and agencies. SAFECOM and NCSWIC hereby offer their expertise in helping federal granting agencies develop waiver criteria.

Sincerely,



Douglas M. Aiken
SAFECOM Co-Chair
National Public Safety Telecommunications Council



Mark Grubb
SAFECOM Co-Chair
National Council of Statewide Interoperability
Coordinators (NCSWIC)



Robert Symons
NCSWIC Chair
Wyoming SWIC
Wyoming Office of Homeland Security
Wyoming Public Safety Communications Commission

