May 3, 2010

Ian Martinez
Senior Advisor and Director of Outreach
Broadband Technology Opportunities Program
National Telecommunications and Information Administration
Department of Commerce
1401 Constitution Ave., NW
Washington, DC  20230

Dear Mr. Martinez,

In accordance with the National Telecommunications and Information Administration (NTIA) state consultation process, the District of Columbia’s Office of the Chief Technology Officer (OCTO), on behalf of the District of Columbia Government, provides the following evaluation of applications for Broadband Technology Opportunities Program (BTOP) Round Two funding. OCTO has reviewed all applications that propose to provide service within the District of Columbia. OCTO’s comments herein are designed to highlight those applications that OCTO can determine from available information are most likely to successfully address the particular needs of District residents. Those needs are described in detail in the District’s own Round Two BTOP applications, including one in each of the three BTOP categories: comprehensive community infrastructure (CCI), public computing centers (PCC), and sustainable broadband adoption (SBA).

The District Government, in its BTOP applications and other initiatives, is striving to bring meaningful broadband access within reach of its neediest, most vulnerable populations. These residents live primarily in Wards 5, 7 and 8 of the city, together comprising approximately 250,000 residents. This overwhelmingly low-income population requires computer training, content, hardware, software, and affordable Internet access through which residents can obtain job training, education, and health care information. Meeting this need is most efficiently and affordably accomplished in partnership with the District’s existing community anchor institutions, such as public libraries and schools, and by taking advantage of the District’s existing network capabilities.

OCTO believes that the most technically and economically feasible approach to providing the benefits of broadband to the most residents in an affordable, sustainable way is to leverage existing District assets citywide. Specifically, in its applications, the District proposes use of existing government-owned fiber infrastructure, buildings, staff and contract vehicles to serve the needs of District residents.

It is unclear why many Round Two BTOP applications are listed as proposing service within the District. For many others, the summaries provided for review offered insufficient information upon
which to base an evaluation. For the remaining applications that were supported by sufficient information, OCTO offers the following comments.

OCTO is pleased that some of the applications that propose to provide service within the District appear to focus on enabling affordable Internet access, computer literacy training, and access to public computer resources. These applications address critical needs in the District. Few applications, however, appear to be grounded in a solid sustainability strategy, which is critical to project success.

Of those applications for which OCTO felt it had sufficient information to support an evaluation, five seemed best tailored and likely to succeed in meeting the needs of District residents:

**Sustainable Broadband Adoption**

- DC Broadband Education, Training and Awareness (DC-BETA)
- District of Columbia Primary Care Association
- District of Columbia Housing Authority

**Public Computing Centers**

- DC Community Computing Resources (DC-CCR)

**Comprehensive Community Infrastructure**

- DC Community Access Network (DC-CAN)

Thank you for the opportunity to review and provide comments on the BTOP applications proposing to provide services in the District of Columbia.

Sincerely,

Kenneth R. Boley
Director, Intergovernmental Initiatives
Office of the Chief Technology Officer
202-478-5879
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July 16, 2010

Ian Martinez
Senior Advisor and Director of Outreach
Broadband Technology Opportunities Program
National Telecommunications and Information Administration (NTIA)
U.S. Department of Commerce
1401 Constitution Avenue, NW
Washington, D.C. 20230

Dear Mr. Martinez:

In accordance with the National Telecommunications and Information Administration’s (NTIA) state consultation process, the District of Columbia’s Office of the Chief Technology Officer (OCTO), on behalf of the District of Columbia Government, provides the following evaluation of the additional application submitted for the Broadband Technology Opportunities Program (BTOP) Round Two funding in the Comprehensive Community Infrastructure (CCI) category. This application was filed in response to NTIA’s re-opening of the application period for recipients of FCC waivers to use the public safety broadband spectrum in the upper 700 MHz band. As with its earlier consultation letters, the District’s comments herein are designed to highlight applications that best address the particular needs of the District and its residents.

The District is home to both local as well as federal public safety agencies and operations, with thousands of public safety personnel. Further, the District is the site of many massive public events each year; it unfortunately also is a high risk target for terrorist activity. As such, the District has a particularly pressing need for interoperable public safety-grade communications, including mobile broadband capabilities.

The Mobile Emergency Responder LTE Interoperable Network (“MERLIN”) project described in application 7820 would go a long way toward meeting the District’s mobile public safety communications needs. As an indication of the District’s desire to obtain an interoperable mobile broadband public safety-grade communications capability, consider that it has already pursued and constructed two pilot networks in the 700 MHz band to provide this service. It also has undertaken—at first alone and later in conjunction with NTIA and NIST—to create a public safety LTE test and demonstration facility for local, state, federal and tribal public safety entities to ensure that LTE will serve their needs.

When the commercial networks (not public safety-grade) overload with commercial traffic and begin to drop and block service—as happens at some of the massive events that occur so frequently in the District—a dedicated public safety network is required for guaranteed first responder connectivity. At this early stage, however, where public safety LTE will exist in some areas but not others, it is critical that first responders be able to roam onto pervasive commercial service. MERLIN proposes to provide that...
capability, not only with the current commercial 3G service, but also with the 4G service carriers will shortly deploy. With the inclusion of applications such as video, on which public safety in the District already relies but for which it has no reliable mobile backhaul capability, the MERLIN project would provide a much needed and long-sought solution for the District. Importantly, it also would enable expansion to neighboring jurisdictions in the National Capital Area and beyond to the mid-Atlantic states.

The MERLIN project would raise the level of public safety services and provide for increased local and regional emergency response capabilities, even while supporting interoperability and emergency response nationwide. These capabilities are necessary for the District to safeguard its operations, its residents and the Federal agencies operating within the city.

The District highly recommends the MERLIN project, application number 7820.

Thank you for the opportunity to review and provide comments on the BTOP applications proposed for public safety services in the District of Columbia.

Sincerely,

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