



Testimony of

The Honorable Todd J. Zinser
Inspector General

U.S. Department of Commerce

before a hearing of the

Committee on Commerce, Science, and Transportation

United States Senate

***First Responder Network Authority's Progress and Challenges
in Establishing a Public Safety Broadband Network***

March 11, 2015

Chairman Thune, Ranking Member Nelson, and Members of the Committee:

We appreciate the opportunity to testify about the current status of and challenges encountered by the First Responder Network Authority (FirstNet). Effective oversight of FirstNet is critical. Our last three *Top Management Challenges (TMC)* reports, for fiscal years (FY) 2013 through 2015, included addressing First Net's implementation of a nationwide wireless broadband network for public safety users among the most significant management and performance challenges facing the Department of Commerce.

Our testimony today, about 3 years after the passage of the Middle Class Tax Relief and Job Creation Act of 2012¹ that established FirstNet, will focus on (I) FirstNet's work to date; (II) the Office of Inspector General's (OIG's) completed oversight efforts; (III) OIG's ongoing oversight of FirstNet; and (IV) the continuing challenges the Department and FirstNet face in their efforts to ensure implementation of a nationwide, interoperable, wireless broadband network for the public safety community.

I. Introduction to FirstNet

Establishment and purpose

Signed into law on February 22, 2012, the Middle Class Tax Relief and Job Creation Act of 2012 (the Act) established FirstNet as an independent authority within the Department of Commerce's National Telecommunications and Information Administration (NTIA). The Act authorized and allocated up to \$7 billion in funding to NTIA for the establishment of an interoperable Nationwide Public Safety Broadband Network (NPSBN). This network is being built to address failures that occurred in the United States on September 11, 2001, during the terrorist attacks, in which first responders could not effectively communicate.

FirstNet is governed by a 15-member Board consisting of the Attorney General of the United States, the Secretary of Homeland Security, the Director of the Office of Management and Budget, and 12 nonpermanent members, including representatives from state and local governments the public safety community, and technical fields. After a public recruitment process, NTIA recommended candidates to the Acting Secretary of Commerce, who announced the appointments in August 2012. The Board's first meeting was held in September 2012. The Act calls for the termination of FirstNet 15 years after its enactment, in 2027.² However, no later than 10 years after the Act's enactment, in 2022, the Comptroller General of the United States must submit to Congress a report on what action Congress should take regarding this 2027 sunset provision.³

¹ Middle Class Tax Relief and Job Creation Act of 2012, Pub. L. No. 112-96.

² *Id.* § 6206(f).

³ *Id.* § 6206(g).

Organization and initial implementation

For roughly the first year and a half of its existence, certain FirstNet Board members functioned in management roles. The Board eventually assembled a management team which assumed all operational responsibilities (see section IV for further details). As of December 2014, FirstNet is organized with multiple program offices reporting to a Deputy Executive Director along with divisions covering areas such as procurement, user advocacy, financial operations, legal counsel, information technology and administration.

So far, implementation of the NPSBN has occurred in the following areas:

- *Establishing an organizational structure.* FirstNet hired key leadership and support staff for its day-to-day operations; developed internal controls; established its headquarters in Reston, Virginia, and its technical headquarters in Boulder, Colorado; awarded contracts to obtain project management and planning support, professional and subject matter support, and network and business plan development; and signed interagency agreements with other federal entities to provide key services.
- *Conducting initial consultation and outreach.* FirstNet launched a website, conducted conference calls and webinars with state single points of contact, coordinated with NTIA's State and Local Implementation Grant Program (SLIGP) team, and established its Public Safety Advisory Committee (PSAC).⁴ In July 2014, FirstNet began to hold a series of state consultation meetings. As of March 2, 2015, 15 of these state consultations had been held.
- *Finalizing a network design approach.* In FY 2013, FirstNet issued 12 requests for information (RFIs) seeking input from vendors and other stakeholders; in FY 2014, it issued another RFI—for assistance in developing a comprehensive network acquisition strategy—and issued a public notice and request for comments seeking input regarding preliminary interpretations of FirstNet's enabling legislation. It also established spectrum lease agreements with four public-safety projects funded by NTIA's Broadband Technology Opportunities Program (BTOP) grant awards program.

FirstNet's current focus is on the consultation and the acquisition/request for proposal (RFP) processes.

Funding and expenditures

The Act authorizes up to \$7 billion in funding to FirstNet for deployment of the NPSBN. Initial funding of FirstNet will come from Federal Communications Commission (FCC) spectrum auction proceeds. The FCC spectrum auction, completed in January 2015, raised

⁴ The Middle Class Tax Relief and Job Creation Act of 2012 required FirstNet to establish the PSAC. It was created in February 2013 and consists of 40 members representing all disciplines of public safety as well as state, territorial, tribal, and local governments. See "Public Safety Advisory Committee" www.firstnet.gov/about/public-safety-advisory-committee.

about \$45 billion, enough to cover the \$7 billion targeted for FirstNet under the Act. FirstNet holds the single Public Safety Wireless Network License for use of the 700 MHz D block spectrum and a pre-existing block of public safety broadband spectrum.

Over the long term, FirstNet must be self-sustaining, through user fees and revenue generated from agreements with third parties that will leverage the value of the network capacity.

FirstNet's expenditures are expected to increase as it moves toward building the NPSBN. FirstNet reported that it spent less than \$250,000 in FY 2012. In FY 2013, it spent about \$17 million, and in FY 2014, it spent an estimated \$26 million.⁵ In September 2014, FirstNet's Board approved a budget of \$120 million for FY 2015. Its FY 2016 budget proposal is for approximately \$160 million. This will provide funding for approximately 150 full-time-equivalent positions, as well as additional contracting and administrative support. FirstNet has entered into various interagency agreements, hired support contractors and, in September 2013, issued a \$67.2 million blanket purchase agreement (BPA) with three contractors for technical and subject matter expert support tasks, to be issued over a 2-year period.

II. OIG's FirstNet Oversight to Date

FirstNet's authorizing legislation did not contain a direct provision for permanent, ongoing oversight. The law provides for two required reviews: (1) an annual independent audit of FirstNet's financial operations and condition and (2) a Government Accountability Office (GAO) report, not later than 10 years after enactment of the Act, or in the year 2022, on what action Congress should take regarding FirstNet's 15-year sunset provision. Nonetheless, since FirstNet is part of the Department of Commerce, and given the importance of this program and substantial commitment of public funds, our office is exercising oversight.

We have established a dedicated audit and evaluations team to oversee the Department's and FirstNet's effort. In addition, we operate a fraud, waste, and abuse hotline for the Department of Commerce through which we have received complaints related to FirstNet and we conduct follow-up on those complaints.

Building on OIG's experience with broadband and public safety programs (e.g., the Public Safety Interoperable Communications grant program and BTOP), the team's initial audit and evaluation activities have included:

- Tracking the progress of FirstNet by observing Board proceedings, meeting with NTIA and FirstNet officials, monitoring FirstNet and NTIA for key actions taken to implement the network, and reviewing key program documents (e.g., *Federal Register* notices and webinar slide decks)
- Developing an initial risk assessment in FY 2013 and reassessing risk as part of annual Department-wide assessments

⁵ Outlays, not expenses, were provided for FY 2012. FirstNet began financial reporting in FY 2013. The FY 2014 results have not been audited yet.

- Identifying FirstNet as a management challenge in our FYs 2013–2015 *Top Management Challenges* reports
- Providing an information memorandum for FirstNet in February 2014 to identify FirstNet’s initial management challenges (including establishing an effective organization, fostering cooperation among various state and local public safety agencies, integrating existing grants to enhance public communications capabilities into FirstNet, and creating a nationwide long-term evolution network)

In addition, we issued a December 2014 audit report on ethics- and procurement-related issues raised by a FirstNet Board member in 2013.⁶ At an April 23, 2013, FirstNet Board of Directors meeting, a Board member presented a resolution raising various concerns, including (1) openness and transparency in decision making by the FirstNet Board, (2) Board members access to records, (3) the development of a plan for FirstNet’s NPSBN, and (4) issues related to ethics and procurement. In addition, the Board member met with the Inspector General in July 2013 to discuss his concerns.

In May 2013, the FirstNet Board established a Special Review Committee to examine these issues. In the public version of its report,⁷ the Committee concluded that (1) the FirstNet Board had engaged in open and transparent decision making, (2) FirstNet did not withhold information from Board members, and (3) FirstNet was still developing its network plan with full consultation and outreach. In October 2013, the Board chairman, based on conversations with the Inspector General, asked the OIG to take over the inquiry into ethics and procurement.

Our audit work, which covered 2012 and 2013, found:

- A. Confidential and public disclosure monitoring procedures were inadequate, some Board members did not file timely disclosure reports, and monitoring of potential conflicts of interest needs improvement.** Because of their status as special government employees and their level of compensation, FirstNet Board members are required to file confidential or public financial disclosure reports. The Department’s Office of General Counsel (OGC) provided guidance to FirstNet Board members, each of whom was required to submit the confidential financial disclosure form; OGC also informed us that it initially provided ethics briefings for Board members, with counselling for those whose employment or financial interests could have created a conflict of interest.

The Department did not consider that some FirstNet Board members would devote enough time to their Board duties to trigger the requirement for the public financial disclosure form. Eight Board members did trigger the requirement in 2013.

⁶ U.S. Department of Commerce Office of Inspector General, December 5, 2014. *FirstNet Must Strengthen Management of Financial Disclosures and Monitoring of Contracts*, OIG-15-013-A. Washington, DC: DOC OIG. See this report for additional detail.

⁷ See FirstNet Special Review Committee, September 20, 2013. *Report on Openness and Transparency, Access to Information and Network Planning* [online]. www.ntia.doc.gov/other-publication/2013/firstnet-special-review-committee-report.

Specifically, we found that OGC was unable to provide a record of all FirstNet confidential and public financial disclosure files, including due dates, as required by federal regulations. Nor had OGC created a schedule of Board members' start dates of service, due dates of disclosures, or a centralized point of record showing the training and counselling provided. In addition, 6 months after the Board began regular meetings, senior NTIA and OGC officials were still debating how best to routinely monitor potential conflicts of interest.

One Board member initially did not file a required public disclosure and, when eventually doing so, did not disclose an interest in a conflicting company. Another Board member submitted the required public disclosure form 5 months late. Two others submitted inaccurate time-and-attendance records, in one case to avoid filing the required public financial disclosure. Finally, all four of these Board members continued to engage in decision making, even though they were not in compliance with the financial disclosure requirements.

Our report included a Department response stating that—although certain administrative requirements may not have been fulfilled with respect to disclosure—as far as the Department is aware, Board members made the material disclosures necessary to identify and address potential conflicts. The Department also stated that OIG did not identify any violations of conflict of interest laws or circumstances that actually affected decision making. In its February 3, 2015 action plan and March 5, 2015 revision to the plan requested by our office, the Department identified actions taken to address these findings. In this response, the Department asserts that various matters related to financial disclosures have been addressed. FirstNet has developed compliance procedures and now coordinates with the Department on financial disclosures and conflicts of interest.

B. FirstNet's contracting practices lacked transparent award competition, sufficient oversight of hiring, and adequate monitoring. NTIA was tasked with helping FirstNet with its start-up efforts, including the procurement of professional staffing services such as project management and planning support, professional and intellectual support, and support to develop network and business plans. Because NTIA does not have a contracting office, it secured contracting assistance from other Departmental bureaus. Between September 2012 and March 2013, the contracting offices at the Census Bureau and the National Institute of Standards and Technology (NIST) entered into three time-and-material (T&M) contracts on behalf of NTIA to meet FirstNet's procurement needs.

T&M/labor hour contracts are considered high risk because a contractor's profit is tied to the number of hours worked; therefore, the government assumes the risk for cost overruns. Because of this risk, OMB's Office of Federal Procurement Policy (OFPP)⁸ requires agencies to provide appropriate government monitoring of contractor performance to give reasonable assurance that efficient methods and effective cost controls are being used.

⁸ OFPP memorandum, October 27, 2009. "Increasing Competition and Structuring Contracts for the Best Results."

We found that the three contracts were awarded as T&M contracts, with a total value of approximately \$14 million (see table 1, next page). Although contract 1 was properly awarded and administered, contracts 2 and 3 were not, as a result of the following:

- *Sole-source procurement for contract 3 did not meet Federal Acquisition Regulation (FAR) exceptions to full and open competition requirements.* The FAR—with limited exceptions—requires government agencies to procure services by obtaining full and open competition through procedures such as soliciting sealed bids and requesting competitive proposals. There are exceptions to obtaining full and open competition when one of several circumstances exists: for example, when (1) there is an unusual and compelling urgency or (2) the procurement is authorized or required by a statute expressly authorizing or requiring an acquisition from a specified source or through another agency. Our review of the justification for the sole source award of the third contract—which NIST awarded noncompetitively to Workforce Resources, Inc. (WRI) for \$8.40 million on March 18, 2013—showed that the justification was inadequate.

According to NIST, it awarded contract 3 noncompetitively because it was the most expeditious way to meet the Act's requirement to establish FirstNet as operational within certain deadlines. Additionally, the contracting office stated in its Justification for Other Than Full and Open Competition (JOFOC) that the procurement was unusual, urgent, and compelling—and that the interruption in services would be costly, as FirstNet had mission essential milestone dates that had to be executed to meet criteria established under the Act. We determined that the justification was inadequate because (a) we found that neither the Act nor the JOFOC identified specific guidelines FirstNet was required to meet and (b) procurement needs did not meet criteria for unusual and compelling urgency.

- *Undue influence from a FirstNet official, which interfered with the contractor's ability to independently recruit and hire consultants.* On two separate contracts, a FirstNet Board member inappropriately directed WRI hiring actions. First, before contract 2 was awarded, the government inappropriately identified and recruited subject matter experts (SMEs). Specifically, FirstNet directed WRI via NIST's contracting office to include a total of 16 SMEs in its proposal. On November 6, 2012—9 days prior to contract award (i.e., November 15, 2012)—NIST e-mailed WRI a spreadsheet containing the names of 14 SMEs. In addition, NIST also confirmed that 12 of the 16 SMEs included in the proposal were recommended directly by a FirstNet Board member, while the other 4 SMEs were transitioned in from the previous engagement with FunctionallIT (contract 1). The actions taken by the government gave the appearance that, in order to be awarded the contract, WRI was required to hire the SMEs recommended by the government.

Neither contracts 2 nor 3 were designated as personal services contracts; however, in both cases, FirstNet directed the hiring of preselected SMEs. Control over hiring and firing decisions is one aspect of the traditional employer-

employee relationship, and thus the exercise of such control by federal employees over contractor personnel can create the appearance of a personal service contracts. Federal agencies generally may not enter into such contracts without explicit authority to do so, essentially because they circumvent the civil service system. In response to our report, FirstNet did not assert that it has this authority. Furthermore, NIST and NTIA contracting personnel should have implemented stronger controls to ensure an independent relationship with contractor personnel—by both allowing the contractor to independently conduct SME recruitment and by not allowing FirstNet to direct hiring actions. Unduly close personal relationships with contractor personnel can create the appearance of favoritism and may call into question the integrity of the procurement process.

- *Adequate surveillance not being conducted over contracts 2 and 3, resulting in approximately \$11 million in unsupported costs to the government.* Contracts 2 and 3, which were T&M contracts, required a level of monitoring that FirstNet ultimately did not provide. Although the Contracting Officer’s Representative (COR) appropriately and consistently rejected incorrect invoices, the COR was also required to review all draft and final work products for “completeness, accuracy, and appropriateness.” However, we were unable to verify that this monitoring actually occurred. We also could not conclude that—at the end of both contract periods—FirstNet received the few deliverables that were expressly required by the contracts (i.e., monthly status reports). WRI acknowledged that NIST did not require it to provide monthly status reports of tasks performed, even though such reports were required in contract 3.

Table 1. Summary of FirstNet’s Time-and-Materials (T&M) Contracts in FY 2012 and 2013

Contracting Bureau (and Contract Number)	Date	Contractor	Contract Value (Millions)
Census Bureau (Contract 1)	09/13/2012	FunctionalIT	\$1.95
NIST (Contract 2)	11/15/2012	Workforce Resources, Inc.	\$3.98
NIST (Contract 3)	03/18/2013	Workforce Resources, Inc.	\$8.40
Total			\$14.33

Source: OIG analysis of FirstNet reports.

Note: Contract 1 was awarded to FunctionalIT for \$1.95 million on September 13, 2012, with a performance period ending on March 21, 2014. Contract 2 was awarded to Workforce Resources, Inc. (WRI) for \$3.98 million on November 15, 2012, and was terminated on March 17, 2013, after \$2.59 million was expended. Contract 3 was also awarded to WRI for \$8.4 million on March 18, 2013, with a performance period ending on December 17, 2013.

In its response to our report, the Department stated that it monitored the performance of its early contracts and that it relied on an unusual and compelling urgency exception to full and open competition. The Department also concurred with our recommendations related to the procurement issues noted in our report. In its February 3, 2015, action plan and March 5, 2015, revision to the plan requested by our office, the Department identified actions planned and taken to address these findings, including its plan to provide guidance to contracting staff on correct procedures for (1) selecting contract types, (2) hiring consultants, (3) ensuring receipt of deliverables, and (4) outreach, training, and oversight effort to prevent occurrences of unauthorized commitments. We are currently reviewing the revised plan.

III. Current Audit Work

OIG continues its oversight of FirstNet. In November 2014, OIG initiated an audit of FirstNet's technical development of the NPSBN. We initiated our audit after coordinating with the GAO, which had already started an ongoing review.⁹ Our objectives are to evaluate and assess FirstNet's efforts and progress to develop the technical design aspects for the NPSBN against key technical requirements and standards, the requirements of the Act, stakeholder requirements, and established performance metrics and milestones. These activities are central to FirstNet achieving its mission to ensure the creation, deployment, and operation of a single, nationwide network design of the NPSBN. We plan to issue a final report on our audit later in FY 2015.

We are currently reviewing interagency agreements used to support FirstNet operations along with its work with entities such as PSAC, NIST, and the FCC to determine whether FirstNet fulfilled consultation requirements of the Act. It is important for FirstNet to consult and collaborate with these entities—which, having expertise regarding interoperable communications networks and knowledge of public safety needs, can provide significant input to how the network can be designed successfully. We are also reviewing expenditures and costs related to technical design efforts to assess spending levels, and information related to initial state consultation meetings to assess progress in incorporating key state concerns into the development of the technical design.

Establishing the NPSBN requires coordination and buy-in from regional, state, tribal, and local jurisdictions. As designated by the Act, FirstNet began consultation with Single Points of Contact (SPOCs) from each state that were established to represent the needs of the different jurisdictions. In April 2014, FirstNet began a process to meet with each state to understand their unique communication needs for the network and to allow an exchange of ideas and questions about the NPSBN. As part of this process, the SPOCs invite members of the public safety community to attend the consultation meetings. FirstNet identified that the initial consultation meetings will be an important step to an iterative, ongoing state consultation

⁹ The GAO review assesses (1) the extent to which FirstNet is carrying out its responsibilities and establishing internal controls for developing the public safety network, (2) how much the public safety network is estimated to cost to construct and operate and how FirstNet plans to become a self-funding entity, and (3) what lessons can be learned from local and regional public safety network early builder projects.

process. To date, FirstNet has completed some consultations and has scheduled others through the end of FY 2015. However, as of March 2, 2015, FirstNet had not scheduled all initial state consultations.

In February 2015, we attended FirstNet’s initial state consultation effort with the state of Delaware—an event attended by the SPOC and other public safety officials throughout the state. The purpose of our visit was to assess FirstNet’s approach to meeting its state consultation requirements. We are considering how FirstNet provides updates on its efforts to develop the NPSBN, as well as how it acquires information from public safety attendees and their unique first responder needs. Our review of a sample of FirstNet state consultation meetings with local first responders found that their key concerns were the cost of participation in the NPSBN; the necessity of priority status for first responders and the ability to preempt other users when accessing a network; and FirstNet’s ability to facilitate rural coverage. In addition, some meeting participants called attention to issues unique to their states, for example rugged terrain or reoccurring catastrophic weather events such as hurricanes or tornadoes.

IV. Continuing Challenges for the Department and FirstNet

Three years after the passage of the Act, FirstNet faces various short- and long-term challenges. As it proceeds, the Department and FirstNet will require continued oversight from OIG, GAO, and Congress. Among the most significant challenges are:

- Ensuring the adequacy of funding for a nationwide network
- Determining the sufficiency of assets contributed to the network by states, local governments and commercial entities
- Incorporating lessons learned from the Broadband Technology Opportunities Program (BTOP)
- Addressing identified internal control weaknesses
- Addressing staffing and other organizational issues
- Effectively executing the consultation process

Adequacy of funding for a nationwide long-term evolution (LTE) network

The Act provides up to \$7 billion to build a nationwide public safety network. FirstNet must build a network that covers most of the 50 states, 5 territories, the District of Columbia, and 556 tribal nations. The 3.8 million square miles to be covered by the network will include areas that are urban, suburban, rural, and wilderness, as well as islands. Although up to \$7 billion was initially authorized by the Act, the total costs to establish the network are still unknown.

Sufficiency of assets contributed to the network

Implementing the NPSBN will require that FirstNet leverage existing infrastructure, such as existing government and commercial buildings, towers, fiber or microwave backhaul, and

data centers. Assets are expected to be contributed by various parties, including states, local governments, tribal entities, and commercial entities. FirstNet must effectively identify which existing infrastructure assets can be incorporated into the network. Also, FirstNet must take appropriate steps to comply with all applicable environmental and historic preservation laws, regulations, treaties, conventions, agreements, and executive orders as it integrates contributed assets into its design.

Lessons learned

FirstNet will need to build upon lessons learned from public safety projects funded by BTOP grants, an American Recovery and Reinvestment Act of 2009 program administered by NTIA to expand nationwide broadband infrastructure and adoption. Of the approximately 230 BTOP awards, 7 went to establish regional public safety broadband networks. However, the passage of legislation establishing FirstNet overtook these projects, and all 7 BTOP awards were partially suspended. Eventually, FirstNet entered into spectrum lease agreements with 4 of the projects. These included grants made to Adams County Communications Center, Inc., Colorado; the Los Angeles Regional Interoperable Communications System Authority; the New Jersey Department of Treasury; and the New Mexico Department of Information Technology. For these ongoing projects, FirstNet will provide technical support and will share any lessons learned on issues such as quality of service, priority/pre-emption, and federal partnerships with the broader public safety community. FirstNet also needs to work closely with the Department of Commerce's Public Safety Communications Research (PSCR) program, which provides support in broadband technologies evaluation and testing, network modeling and simulation, and standards.

Previously identified internal control weaknesses

Initially, FirstNet struggled to establish an organization and necessary internal controls. In July 2014, an independent public accounting firm¹⁰ reported a material weakness related to the financial reporting process in FirstNet's first financial statement audit required under the Act.

Additionally, as mentioned previously in this testimony, our December 2014 report on ethics- and procurement-related issues found that the Department's monitoring procedures for financial disclosure and potential conflicts of interest at FirstNet were inadequate. We also found that FirstNet's contracting practices lacked transparent award competition, sufficient oversight of hiring, and adequate monitoring. As we previously noted, the Department has acknowledged OIG's findings, concurred with our recommendations, and is undertaking corrective actions.

¹⁰ KPMG LLP, July 24, 2014. *Independent Auditor's Report to the Secretary of Commerce and the FirstNet Board of Directors.*

Staffing and other organizational issues

FirstNet has encountered difficulties in hiring and maintaining staff for key technical positions. Nevertheless, FirstNet has made progress in establishing a management structure. For instance, certain Board members no longer play dual roles as Board members and managers. As noted above, for roughly the first year and a half of its existence, certain Board members functioned in roles as both board members and as part of the management team, before FirstNet eventually assembled a separate management team and transferred operational responsibilities to it. Nonetheless, while many senior positions (e.g., chief information officer, chief administrative officer, chief counsel, and chief financial officer) are in place, key leadership positions throughout the organization remain vacant, including the chief user advocacy officer—a leadership position managing consultation and outreach—as well as regional directors and supervisors for consultations. Two FirstNet executives have left their positions, which are now being filled in an acting capacity.

Effective execution of the consultation process

The Act designates at least three federal agencies—the FCC, NTIA, and NIST—to provide consultation and support to FirstNet. The Act also required the creation of the PSAC to assist FirstNet in meeting its mission.

The Act also directed that FirstNet consult with regional, state, tribal and local jurisdictions regarding the distribution and expenditure of funds required to establish network policies. Cooperation from these jurisdictions is a significant factor in ensuring the successful deployment and sustainability of the NPSBN. Specific consultation topics outlined in the Act include core network construction and Radio Access Network (RAN) build out, placement of towers, and network coverage areas, among others.

FirstNet is to consult with the jurisdictions through a locally designated officer or body, generally referred to as the Single Point of Contact (SPOC) for each jurisdiction. Accordingly, FirstNet has begun initial consultations with SPOCs and must consider the information it collects into the NPSBN's development. FirstNet had set an internal goal to have initial consultations with each jurisdiction completed by the end of November 2014. However, while FirstNet has held some initial consultation meetings and has scheduled others into September 2015, many have yet to be scheduled (see table 2, next page). FirstNet has indicated that the timing of these meetings depends on each state's readiness and how quickly FirstNet can fully staff its outreach team.

Table 2. Status of First Net’s Initial State and Local Consultation Meetings as of March 2, 2015

Status	Number
Completed	15
Scheduled	26
Not scheduled	15
Total	56

Source: OIG, based on FirstNet data.

Note: The target date for completion of meetings is November 30, 2014.

As we continue our oversight of FirstNet, we will keep the committee informed of FirstNet’s progress with respect to the challenges discussed here—and any others we identify through our audits and investigations.