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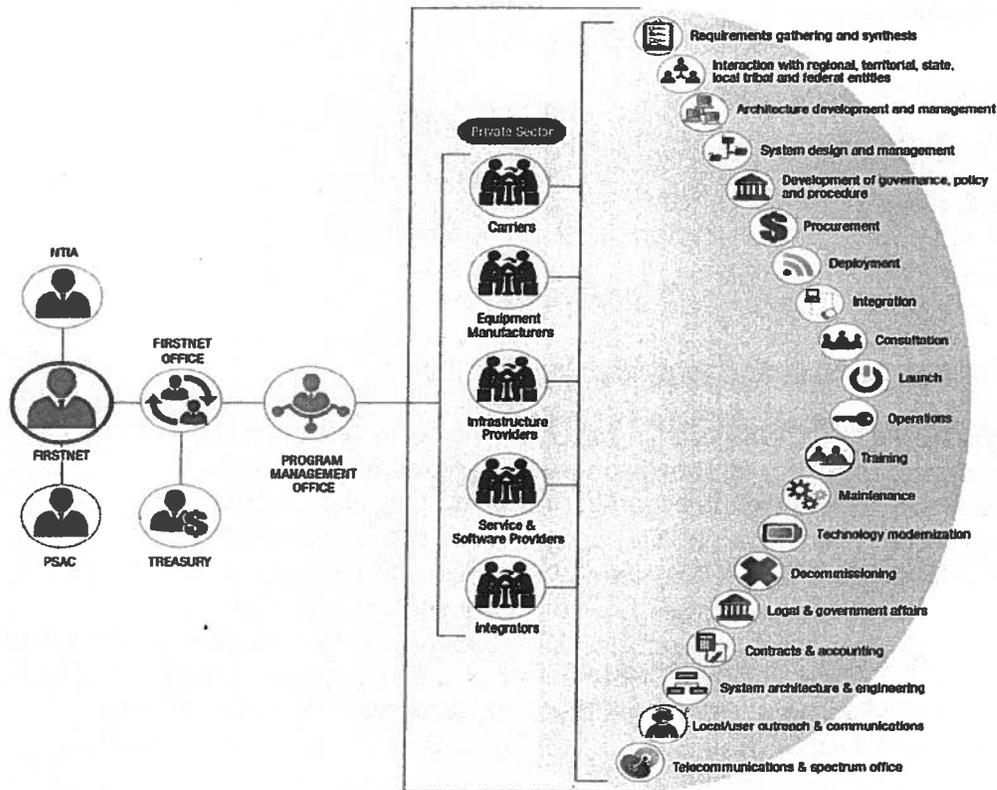
March 13, 2013

Chairman Greg Walden
Ranking Member Anna G. Eshoo
Subcommittee on Communications and Technology
House Commerce Committee
Washington, D.C. 20515

Dear Chairman Walden and Ranking Member Eshoo,

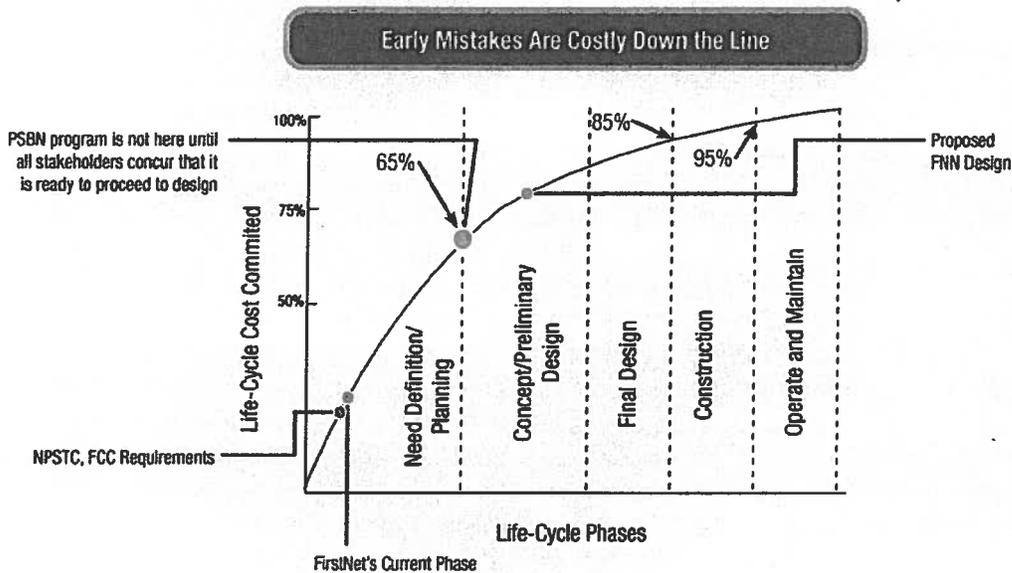
Textron Systems, Inc., a leader in federal program management and government contracting, is submitting our perspective on the importance of a single program management organization (PMO) as it pertains to the Public Safety Broadband Network (PSBN) program for the House Energy and Commerce Subcommittee's 'FirstNet Oversight Hearing' scheduled for March 14th, 2013. A PMO offers a multitude of services to support the efficient execution of programs in a transparent and accountable manner. Our team is deeply invested in the success of the PSBN and the promise it holds for the Public Safety community. We hope our unique perspective will aid the Committee, the FirstNet Board, and the Public Safety Community as they consider this important challenge.

Textron Systems has done a top to bottom analysis of the goals and challenges of the PSBN. For further detail please reference www.connectingfirstresponders.com. Conventional wisdom among all PSBN stakeholders suggests that developing the PSBN is not necessarily a technology challenge, but is an organizational, financial, governance, and integration challenge. Textron Systems, as well as many other companies like us, are highly experienced at executing government programs with similar challenges. Effective program management, based on proven principles and processes, increases the likelihood of success for new programs; speeds up the process to deployment; saves taxpayer money; provides accountability and transparency; and brings a seasoned hand to the laborious government hierarchy that can paralyze new entrants. As we have learned over our decades of experience, a program manager is many things. Most importantly, in our current austere economic environment, a program manager is financially and legally accountable—accountable to FirstNet, accountable to those on the front lines in an emergency and accountable to the taxpayers who have significant investment in the success of the PSBN. A program manager with full fiscal accountability will make sure that the financial component of this complex effort is in line—and will bear responsibility if it is not. Fortunately, a program manager is explicitly authorized in the enabling legislation, Section 6205(b) (1), however it is unclear whether or not FirstNet intends to stand up a PMO in the near term.



Program Management Functions to ensure success of PSBN

It is our view that FirstNet can achieve success by following a tried and true formula for developing large, complex systems. Our most significant recommendation is to select tasks and do them in order, based on the traditional formula for large program success (i.e. DoD 5000, Program Management Institute best practices, etc.). FirstNet sets the vision, while an experienced program manager works with the board to scope the problem and take the necessary steps to fulfill the board's vision, including the first crucial steps—soliciting requirements from public safety users, evaluating the technical design of the network and related business models, and helping the board generate a FirstNet Nationwide Network (FNN) design concept that aligns all stakeholders. Developing and publicizing a clear and prioritized plan will help ensure that all stakeholders are aware, engaged, and supportive of efforts, helping to deliver upon the promise of the PSBN.



Optimal Planning Mitigates Risks of Failure (Source: Blanchard, B.S., Design and Manage to Life Cycle Cost, Forest Grove, OR. MA Press, 1978)

FirstNet should be able to explain, in detail, why decisions have been made that may be to the perceived disadvantage of some elements of the stakeholder community but are necessary to protect the system as a whole. Our experience shows us that taking the time up front to simultaneously negotiate performance and cost almost always results in shorter timelines and lower program costs. Expensive redirects based on changing (or newly discovered) requirements can quickly lead to ballooning costs detrimental to the program.

The road from ramp-up to deployment is long and full of obstacles. FirstNet needs a committed, experienced guide, equipped with resources and armed with feedback to ensure the ultimate success of the program. In order to get the best value, the program manager must be free of any organizational conflicts of interest (OCI). The industrial community that has a potential financial stake in the PSBN is vast, and the potential dollars on the line are significant. An OCI-free program manager is critical to maintaining industry trust, competition, and an open door to traditional and non-traditional players with potentially disruptive technologies that could significantly benefit the program.

Enabling open competition in the process of building out the network will encourage vendors of all sizes to lower bids and achieve the best value for taxpayer investment. Furthermore, strong OCI requirements and

transparency rules will ensure competition is open and fair, and prevent anti-competitive deal making that could drive up the costs of the program. Although continuous competition holds the promise of keeping costs low, a program manager can prevent extended and lengthy bid cycles from introducing delays that drive costs back up. Overall, open competition will enhance the financial viability of the program.

How the command and control of the network is to be done, and who makes the command decisions controlling the modes must be supportive of local needs, but someone needs to resolve the expansion of control as an emergency grows in scale. A single Program Manager can balance this equation and establish network operating policies in a responsive manner that support the needs of the diverse localities, while still maintaining cost within an acceptable range. For example, it is likely that significant controversy and a difficult debate among users of the PSBN would result from competing, legitimate views among stakeholders in determining who has control of the modes. Fiscal controllers may have a different view than emergency personnel of how the network should be managed nationally, regionally, and locally responding to an event.

The PSBN holds great promise for the nation, but communities across the country may not be aware of FirstNet's plans for the network. State and local governments and first responders have already started to develop alternate solutions and in turn may not support local leadership investing in PSBN. Without widespread buy-in, the PSBN will weaken. Broad public support at all levels ensures a strong, consistent, and truly interoperable network that meets the goals set forth by the 9/11 Commission. The key to obtaining the buy-in from public safety users who are the "boots on the ground" responders is to clearly and definitively show what the system will do, when it will be available, and how much it will cost at the user level. This value must be communicated early and often from FirstNet in order to obtain and maintain the commitment from the user community.

The National Public Safety Telecommunications Council (NPSTC) Local Control Task Group and the FCC Technical Advisory Board for First Responder Interoperability have worked tirelessly over the past three years to define requirements for this network. These results now serve as a starting point for the requirements generation needed to design the FNN and should now be exponentially expanded to include a much wider set of public safety contributors, who have disparate and highly localized needs, not just a reflection of the views of industry or select user community representatives. Most of the requirements stated in the documents are technical instead of being performance-based. It is left to the individual reader to understand how these requirements translate to performance in support of public safety missions. Most public safety personnel are not well equipped to translate technical specifications to mission performance, making it difficult for users to understand whether the requirement clearly meets their needs or not. FirstNet should make it possible for public safety users to provide their input in the course of their busy lives and schedules, and should look to its

program manager for modern, creative ideas for the implementation of this assignment.

The PSBN is a critical system that has the potential to impact every American life. It is our view that the immediate next step is for FirstNet to hire a program manager as the prime contractor. Once in place, the "honest-broker" OCI-free program manager will guide the way through the process by providing an experienced view to each of FirstNet's many responsibilities. The program manager also brings a wealth of proven processes, resources (human, facilities, financial, technical communications, contracts, legal, managerial – to name a few) and stability. Among these processes are methods for insuring the transparency of the design, deployment and operation of the system in accordance with Federal program rules and policies, but most importantly, the expectations of the public. The program manager's most important initial step is to help FirstNet connect with as diverse and large a range of its customers as possible – the actual users of the PSBN – to best understand the necessary public safety requirements. In parallel, the program manager, with the support and guidance of FirstNet, develops viable business cases and arrangements that are congruent and mutually supportive of the technical solutions. Then the program manager, again via guidance and direction from FirstNet, establishes an open, continuously competitive environment for implementation of the designs in a structured manner across the country. Ensuring this system meets the needs of our diverse nation and the men and women who protect us will require a focused, experienced, processed base program management approach to structure an acquisition toward a best value solution.

Again, thank you for the opportunity to share our views on the value a program manager would bring to this important national effort in support of our first responder community.

Very respectfully,

A handwritten signature in black ink, appearing to read "D. A. Hairston", with a long horizontal flourish extending to the right.

Donald A. Hairston
Sr. Vice President & General Manager
Advanced Systems

