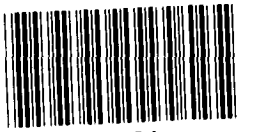
BY THE U.S. GENERAL ACCOUNTING OFFICE

# Report To The Director Of The Office Of Management And Budget

# Federal Agency Roles And Responsibilities For Emergency Communications Need Clarification

The Interagency Committee on Search and Rescue developed its Emergency Response Communications Program without establishing the need for a satellite system or considering alternatives. The program, which could cost as much as $1 billion, may be unaffordable. As proposed, it is also inconsistent with the President's Civil Space Policy and duplicates other attempts to improve emergency communications.

To avoid duplicative and inconsistent efforts, the Office of Management and Budget, in coordination with other Federal agencies and offices involved, should clarify roles and responsibilities for emergency communications.





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UNITED STATES GENERAL ACCOUNTING OFFICE
WASHINGTON, D.C. 20548

LOGISTICS AND COMMUNICATIONS
DIVISION

B-199332

The Honorable James T. McIntyre, Jr.
Director, Office of Management and
Budget

Dear Mr. McIntyre:

This report discusses the Emergency Response Communications Program and the need to clarify Federal roles and responsibilities for emergency communications.

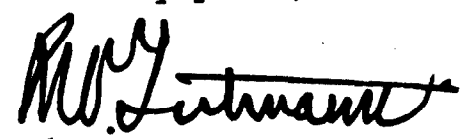
At the request of Congressman Don Young, we made this review to (1) evaluate the June 1979 report on the Emergency Response Communications Program, (2) determine Federal agencies' and offices' responsibilities for emergency communications, and (3) determine plans for following up on the June 1979 report findings.

This report contains recommendations to you on page 22. As you know, section 236 of the Legislative Reorganization Act of 1970 requires the head of a Federal agency to submit a written statement on actions taken on our recommendations to the Senate Committee on Governmental Affairs and the House Committee on Government Operations not later than 60 days after the date on the report and to the House and Senate Committees on Appropriations with the agency's first request for appropriations made more than 60 days after the date of the report.

We are sending copies of this report to the Secretaries of Commerce, Defense, the Interior, Transportation, and the Air Force; the Commandant of the U. S. Coast Guard; the Administrators, General Services Administration and the National Aeronautics and Space Administration; the Directors, Office of Science and Technology Policy and the Federal Emergency Management Agency; the Executive Director, Domestic

Policy Staff; the Assistant to the President, National Security Council; the Chairman, Federal Communications Commission; and the Manager, National Communications System.

Sincerely yours,



R. W. Gutmann
Director

GENERAL ACCOUNTING OFFICE
REPORT TO THE DIRECTOR OF
THE OFFICE OF MANAGEMENT
AND BUDGET

# FEDERAL AGENCY ROLES AND RESPONSIBILITIES FOR EMERGENCY COMMUNICATIONS NEED CLARIFICATION

## D I G E S T


The June 1979 report of the Interagency Committee on Search and Rescue, which proposed a national Emergency Response Communications Program, is not a reliable basis for decisionmaking because the Committee did not establish the need for the program, examine alternatives, or adequately consider the program's cost and funding.

As envisioned by the Committee, a satellite system would provide voice, data, and video coverage to mobile and fixed station users in all 50 States, Puerto Rico, and the Virgin Islands. Because the satellite system envisaged is beyond state-of-the-art technology it will require substantial research and development effort.

In developing its proposed program, the Committee did not follow the Office of Management and Budget system acquisition guidelines intended to ensure that system development will not begin until a need has been verified. Instead, the Committee assumed a need existed and that a satellite communications system should be acquired to meet the need. (See p. 5.)

Because it began its study with these presumptions, the Committee failed to examine alternative systems. (See p. 9.)

One of the criteria the Committee used in developing its program was that it would be affordable. However, a number of potential users advised the Committee that they could not fund the program. As a result, the Committee chose to omit a discussion of cost, even though the program is expected to be as much as $1 billion. (See p. 11.)

Because the users cannot afford it, the Committee believes the Government should fund the research and development, first launch, and testing of the satellite system. Once operational, the users would pay to operate and maintain the system. (See pp. 11 and 12.) This, however, is not consistent with the President's October 1978 Directive on Civil Space Policy which looked for private industry rather than the Government to provide the needed services. In accordance with the President's directive, the National Telecommunications and Information Administration established the Dispersed Users Satellite Program to meet public service needs for satellite communications. These public services include police and public safety, firefighting, search and rescue, and post-disaster restoration--essentially the same services covered by the Committee's program. (See pp. 14 and 15.)

In addition to these two programs, two other efforts were initiated to improve emergency communications.

--In November 1978 the Defense Civil Preparedness Agency issued a request for a quotation to industry for the lease of an emergency satellite communications system expected to provide each State the capability to restore communications after a major disaster. The agency withdrew its request for quotation because, among other things, venders indicated the required technology would be too expensive. (See p. 19.)

--In February and March 1980 the Federal Emergency Management Agency asked several Federal agencies to form another interagency committee to develop an emergency response satellite communications capability. (See p. 20.)

To a large extent, these separate but clearly similar and interrelated activities are duplicative and inconsistent. They illustrate the confusion and uncertainty of Federal agencies' roles and responsibilities for emergency

communications which occurred when the Office of Telecommunications Policy was abolished.

With several Federal agencies responsible for emergency communications, the Committee was unsure where to send its report for implementation. Nine months after the report was completed, the Committee sent it to the Federal Emergency Management Agency, recommending it be forwarded to the President for further action. (See pp. 17 and 18.)

GAO recommends that the Director, Office of Management and Budget, in coordination with other Federal agencies and offices involved, clarify roles and responsibilities for emergency communications so that duplications and inconsistencies can be eliminated. Pending the clarification of roles and responsibilities, GAO also recommends that (1) no further action be taken on the Interagency Committee's Emergency Response Communications Program and (2) future efforts to develop a national emergency communications system be consistent with existing laws, policies, and regulations. (See p. 22.)

Nine of the 10 offices and agencies commenting agreed with GAO's evaluation of the Emergency Response Communications Program. Only the Federal Emergency Management Agency disagreed. Eight of the 12 organizations commenting on the need to clarify Federal agencies' and offices' roles and responsibilities for emergency communications agreed with GAO. However, four Executive Office-level agencies, including the Office of Management and Budget, disagreed. They stated that Executive Office guidance clearly delineates the authority and responsibility for telecommunications. (See pp. 22 to 26.)

GAO believes a clear understanding of the lines of authority and responsibility for telecommunications at all levels of Government is needed. The differing views regarding the need for clarification of roles and responsibilities highlight this need.

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ABBREVIATIONS

| | |
|---|---|
| DOD | Department of Defense |
| ERCP | Emergency Response Communications Program |
| FEMA | Federal Emergency Management Agency |
| GAO | General Accounting Office |
| NASA | National Aeronautics and Space Administration |
| NTIA | National Telecommunications and Information Administration |
| OMB | Office of Management and Budget |

# CHAPTER 1

## INTRODUCTION

In June 1979 the Interagency Committee on Search and Rescue issued a report claiming to establish the need for and characteristics of a national Emergency Response Communications Program (ERCP). The report also claimed to provide the groundwork for developing a politically, economically, and socially feasible emergency satellite communications system for the program.

The report has proven to be unreliable, a product of assumption rather than analysis. This occurred because the Interagency Committee working group

--failed to establish the need for the program it proposed,

--failed to adequately consider alternative communications systems,

--chose to disregard the program's cost and funding, and

--proposed a program inconsistent with the President's October 1978 Directive on Civil Space Policy.

Of far greater importance, however, is that no single focal point exists to coordinate all aspects of Federal telecommunications. This has led to confusion and resulted in duplication of effort to improve emergency communications.

## DEVELOPMENT OF THE EMERGENCY RESPONSE COMMUNICATIONS PROGRAM

The Interagency Committee on Search and Rescue was established in March 1974 to oversee the use of search and rescue resources and to act as a coordinating forum for national search and rescue matters. It is composed of representatives from the Departments of Transportation, Defense, Commerce, and the Interior; the National Aeronautics and Space Administration (NASA); and the Federal Communications Commission. The Committee Chairman, a member of the U.S. Coast Guard, represents the Department of Transportation. The Chairman reports to the Secretary of Transportation through the Commandant of the Coast Guard.

In March 1978 the Interagency Committee chartered an ad hoc working group to examine emergency communications

requirements and to assess the ability of existing communications systems to meet these requirements. The charter was later amended to provide for the development of an ERCP. The Department of Defense (DOD) representative to the Interagency Committee chaired the working group. The group's membership primarily included representatives from the agencies comprising the Interagency Committee. In addition, the National Association for Search and Rescue, a private organization, heavily supported the working group's efforts.

## The Emergency Response Communications Program: What is it?

As envisioned, the ERCP would satisfy the emergency communications requirements of all governmental agencies--local, State, and Federal--by

- --providing communications to areas in which conventional communications systems do not exist due to cost,
- --providing emergency communications in situations where existing communications have been reduced or destroyed, and
- --augmenting existing communications during conditions when an overload occurs.

The program would provide communications in four major types of emergencies: disasters, search and rescue, emergency medical, and law enforcement.

The program would employ a satellite communications system to provide voice, data, and video capability to mobile and fixed station users in all 50 States, Puerto Rico, and the Virgin Islands. The satellite would be equipped with a directional pencil-beam antenna and be capable of internal switching.

As envisioned, the system would be commercially (i.e., private industry) based and affordable to the users. Since private industry has neither provided this type of service in the past nor plans to in the future, the Interagency Committee believes the Federal Government should fund the research and development, first launch, and testing of the system. Once operational, the users would pay to operate and maintain the system.

## Status of Committee recommendations

The Interagency Committee submitted its report to the Secretary of Transportation on June 25, 1979, with a recommendation that the report be forwarded to the President for appropriate action.

On August 7, 1979, the Acting Deputy Secretary of Transportation returned the report to the Interagency Committee indicating that additional work appeared necessary. The Acting Deputy Secretary also suggested that it seemed more appropriate to submit the report to the Director of the recently created Federal Emergency Management Agency (FEMA).

On January 24, 1980, representatives of the Interagency Committee unanimously agreed to forward the report to FEMA and to request that the Agency review and forward the report with its comments to the President. FEMA officials have expressed reservations about the report, however. These reservations center around the fact that the scope of the ERCP is not entirely within the purview of their Agency.

The Interagency Committee formally transmitted the report to FEMA on March 18, 1980.

## SCOPE OF REVIEW

Our review of the ERCP included an examination of laws, directives, and agreements pertinent to the fields of telecommunications and emergency response; the events that took place before and following the report's dissemination; the activities conducted by the working group during that period; and the responsibilities of various Federal agencies and organizations for telecommunications.

Our review of the ERCP was performed at the following Federal agencies in the Washington, D.C., area, where we interviewed officials and examined relevant documents:

--Office of Management and Budget.

--Federal Emergency Management Agency.

--National Telecommunications and Information Administration.

--National Communications System.

--Office of Science and Technology Policy.

--National Security Council.

--Assistant Secretary of Defense (Communications, Command, Control, and Intelligence).

--Federal Communications Commission.

--General Services Administration.

--U.S. Coast Guard.

--National Aeronautics and Space Administration.

--Department of the Interior.

--Department of Commerce.

In addition, we interviewed the Administrator, National Association for Search and Rescue.

## CHAPTER 2

## DEVELOPMENT OF THE EMERGENCY RESPONSE COMMUNICATIONS PROGRAM WAS NOT EFFECTIVELY DONE

The Office of Management and Budget (OMB) specifies basic major system acquisition and development practices which all systems should follow. 1/ These practices are intended to ensure that no system begins development until a need for it has been verified.

In developing the ERCP, the Interagency Committee working group did not follow OMB's acquisition policy. As a result, the working group did not establish the need for the program or adequately consider alternatives to the program. Therefore, we do not believe that the Interagency Committee's June 1979 report, which claims to establish the need for and characteristics of a national ERCP, can be accepted as an accurate and objective analysis.

### NEED FOR THE EMERGENCY RESPONSE COMMUNICATIONS PROGRAM NOT ESTABLISHED

The working group decided that a satellite communications system was needed before it evaluated existing conditions and user needs. This is not normal procedure. The need should be identified before the solution.

#### How need is determined

A need can result from a deficiency in existing capabilities, the decision to establish a new capability in response to a technologically feasible opportunity, or a desire to reduce costs in an area. Acquisition programs for new major systems are to begin after a need for them is established. The need is determined from "an analysis of an agency's mission reconciled with overall capabilities, priorities, and resources." 2/ When the analysis identifies a deficiency or a feasible opportunity to use new technology, this should be formally set forth in a "mission need statement."

---

1/OMB's Federal Procurement Policy issued Circular A-109 in Apr. 1976, establishing policy for executive agencies to follow in managing the acquisition of major systems.

2/OMB Circular A-109, dated Apr. 5, 1976, p. 7.

The mission need statement, a key document of the acquisition process, provides the basis for high-level decisionmaking. Needs should be expressed in general, mission terms and not in specific, equipment terms, to encourage innovation and competition in creating, exploring, and developing alternative system design concepts.

Satellite identified as being needed before evaluation was begun

In developing the ERCP, the working group did not identify deficiencies or the feasibility of new technology. It began its study with the idea that a satellite communications system could satisfy the requirements of all governmental agencies.

This approach poses two serious problems:

--No system should begin development until a need for it has been verified. Without clearly identifying and defining the need, there can be no assurance that the chosen system will best fulfill that need.

--The need should be described in terms of what is needed to do the job, rather than system performance specifications or technical characteristics. If the need is stated in terms of the task to be done, it should be possible to explore a wide range of alternatives.

The idea that a satellite system was needed was reached even before the working group was established. In March 1978 the DOD representative to the Interagency Committee invited representatives from the Air Force, National Association for Search and Rescue, Coast Guard, Defense Civil Preparedness Agency, 1/ NASA, and the Office of Telecommunications Policy 2/ to Eglin Air Force Base, Florida, to discuss emergency communications requirements. Those present agreed to pursue a national Emergency Response Satellite Communications Program. This was a key decision because it set the pattern for efforts to follow.

Shortly after the Eglin meeting, the working group was established, with the DOD representative as chairman and its

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1/Executive Order 12148, July 20, 1979, transferred the functions of the Defense Civil Preparedness Agency to FEMA.

2/Executive Order 12046, Mar. 27, 1978, abolished the Office of Telecommunications Policy.

core membership comprised of many of the same representatives who had met at Eglin earlier. At this point, the working group had already bypassed a key element in the system acquisition process. It had not analyzed the emergency response mission to identify the need for improved capability or the feasibility of new technology represented by this particular satellite. Rather, the working group started the process with the preconceptions that a need existed and that a new satellite communications system should fill that need.

Shortly after the working group was set up, its members were assigned to committees, including one to develop a list of groups that would use an emergency communications system and what they would need from such a system. According to group members, four regional meetings were held with potential users to determine their needs. Representatives of all 50 States, as well as several Federal agencies, were invited to attend these meetings. Representatives from 21 States attended the meetings.

The only documented results of the working group's efforts to determine users' performance requirements are the June 1979 report; minutes of the regional meetings; and a July 10, 1978, memorandum prepared by the user requirements committee. Neither the report nor the minutes includes specific user needs, and the July memorandum was prepared before three of the four regional meetings were held. In other words, the working group had not established what the users needed.

Need for satellite questioned by potential users

The working group did not consider the views of those who were opposed to a satellite system. For example, several States indicated that existing communications systems were adequate. Others indicated that communications problems were more the result of organizational and management problems than of equipment problems.

Several Federal agencies also expressed concern. In May 1979 the Federal Aviation Administration suggested that the working group be reinstituted with broadened representation from other Federal agencies to, among other things, explore the definitive need for the program. Also, the Deputy Assistant Secretary of Defense (Communications, Command, Control, and Intelligence) commenting on the working group's draft report stated:

"The program presented is designed to do all things at all levels, ranging from locating a lost hunter to coordination of a Presidentially declared major disaster area type situation. The detailed analysis to identify valid requirements and the communications shortfalls incident to this continuum of situations does not seem to be included in the report. Existing communications systems which form the foundation for national level disasters and emergency communications support today are discounted in favor of a totally new satellite system which may not be presently within the state of the art. The cost of such an endeavor can not be supported by the analysis contained in this report.

"Therefore, while the March 1979 draft may contain a plausible requirement for emergency communications augmentation, the total system presented does not seem to be technically feasible nor economically justifiable at the present time."

These comments are noteworthy, since they also reflect the views of the National Communications System's Manager. The mission of the National Communications System is to ensure that the Government's most critical telecommunications needs are met in any possible emergency situation and that the day-to-day telecommunications needs are most effectively and economically met.

The Coast Guard, one of the primary Federal agencies responsible for search and rescue matters, noted in February 1979 that:

"The Coast Guard has program responsibilities, and therefore communications requirements in several areas which could be termed emergency response situations. However, unlike several other agencies which are also interested in the ERCP concept, the Coast Guard has an efficient and reliable communications system which provides the necessary communications support to these programs."

This statement is also important because the Coast Guard's Chief of Operations chairs the Interagency Committee on Search and Rescue, which chartered the working group. On the basis of the Coast Guard's comments, as well as those of several other agencies, we believe that the Interagency Committee members did not accurately represent the views of their agencies.

## ALTERNATIVE SOLUTIONS NOT ADEQUATELY EXPLORED

The working group, by starting the acquisition process with one preferred system--a satellite communications system--did not consider alternative systems. This is contrary to OMB policy which emphasizes early consideration of alternative system design concepts. Soliciting from private industry alternative ways of fulfilling a need is essential in the acquisition process.

Approval of mission needs starts the system acquisition process, by granting authority to explore alternative system design concepts. Approval of mission needs does not automatically mean that a new system will be acquired. A need may be best satisfied by a change in doctrine, modification of existing equipment, purchase of additional equipment already in production, or training.

For this reason, mission needs should be expressed generally, rather than in terms of equipment or other means which might satisfy the need. Contractors should be free to propose their own technical approach, main design features, subsystems, and alternatives to cost, schedule, and capability goals. This flexibility encourages industry to be innovative and competitive because it is not limited by preordained or prematurely selected equipment.

The Interagency Committee's June 1979 report is too specific regarding the system that is needed. It includes only a single statement regarding consideration of alternatives:

> "Alternative system concepts based on incremental additions to present equipments, extension of proven terrestrial systems, and employment of satellites have been examined."

We found no evidence to support this statement. Two working group members told us that no thorough assessment of alternatives was made. This probably occurred because a satellite communications system was seen as the answer to all communications problems from the inception of the study.

Other agencies also noted the absence of consideration of alternatives. In commenting on the draft report, the General Services Administration noted that the report "* * * does not address alternatives to complete reliance on

satellites." A NASA official observed that a competitive analysis of systems or combinations of systems is lacking. In addition, an official of the National Research Council said he would

> "* * * like to have a balanced study of how these existing and planned communications resources (including satellites) can be utilized in emergencies before we resort to another expensive specialized satellite system."

It is not surprising, however, that alternatives were not considered. The working group would have had an extremely difficult time performing such an analysis. Without clearly identifying and defining the need to be satisfied, determining the best method of satisfying it would have been virtually impossible.

## CHAPTER 3

## COST AND FUNDING OF THE EMERGENCY RESPONSE COMMUNICATIONS PROGRAM ARE UNCERTAIN

Even if the Interagency Committee working group's proposal for an emergency satellite system was credible, it would have to be questioned from a cost and funding standpoint. The cost of the ERCP is unknown at this time, but it is expected to be as much as $1 billion, since the technology currently does not exist. These unknown program costs and questions on funding were major concerns of several potential users who, at some point, would be paying for its services.

Recognizing that private industry was neither doing enough research and development for this type service nor planning to do so soon, the Interagency Committee concluded that Government funding should be used to develop the required technology and to start the program. This concept is inconsistent with the President's October 1978 Directive on Civil Space Policy.

### PROGRAM COST UNKNOWN

The ERCP's cost will have a direct bearing on whether potential users will be able to afford its services. Therefore, a criterion used in developing the ERCP was that it would be affordable. The Interagency Committee believed that, if enough users subscribed to the program, each could absorb a small portion of the total cost, and therefore, fund the program. However, the working group never verified this theory. Its report, while claiming the program laid the groundwork for developing an economically feasible emergency communications system, does not include a cost for the system it proposes. Without a realistic cost estimate, the economic feasibility of the program cannot be determined.

### System cost and funding concern potential users

Several States and Federal agencies responding to the group's draft report questioned the cost effectiveness of the proposed program. Most endorsed the working group's efforts, but generally, the States said their budgets would not permit allocation of funds to support an emergency

communications system. Since the Interagency Committee thought the initial costs of the proposed system should be absorbed by the Government rather than the States, it decided that the funding issue should not be discussed in the final report. This premise was unjustified because the States' concerns related not only to initial start-up costs but to operating costs as well.

For example, Virginia stated that funding availability was a major problem:

> "The states have not been able to fund 100% of their terrestrial communications systems; there is little possibility that they will be able to 100% fund their side of a satellite communications system. * * * Diverting monies needed for high-density terrestrial communications systems to fund limited use, low-density satellite communications does not seem to be a cost effective approach to us, no matter how efficient and desirable the satellite communications system may be.
>
> "* * * without substantial federal funding assistance, it is doubtful that the Commonwealth of Virginia will be able to participate using only state funds."

Other States voiced similar concerns. New Mexico, for example, stated that participation in the program "may not be justifiable unless Federal funding or incentive matching programs are offered to enlist our support and participation." In May 1979 the Governor of Illinois commented that:

> "This draft digest portrays a costly burden on protective actions prior to their occurrence. An assessment of the potential user's willingness to pay for an emergency response communications satellite is void at this time."

Federal agencies also expressed concern over the cost of the proposed ERCP. The General Services Administration stated:

> "The report proposes a single communications satellite system, dedicated to serve all agencies, Federal and State, in all emergency situations imaginable. It does not address alternatives to complete reliance on satellites. It does not consider the use of commercially available services

or the modifications to such systems to make them more responsive to emergency situations. It is probable that such a ubiquitous and versatile system, on an emergency standby basis, would not be cost effective."

The Coast Guard's response regarding the March 1979 draft report stated:

"In general, it does a good job of stating the users problems with communications during disasters. It does not however, adequately treat the potential system costs and analysis of benefits to be derived from an operational system."

These comments from States and Federal agencies clearly demonstrate a widespread concern about the cost and funding of the proposed program. These are legitimate concerns, too, since the ERCP cost is expected to be substantial.

Proposed satellite communications system will require extensive research and development

ERCP, as proposed, is not within state-of-the-art technology. One of the primary advocates of the ERCP acknowledged that it pushes technology to its outer limits. Some officials estimate that the technology required for the ERCP could be as far as 10 years away. Therefore, research and development to support the program would have to be extensive.

No existing satellites of the size envisioned for the program have been built for communications; therefore, all cost estimates are subject to interpretation. Nonetheless, a NASA official estimated that the development cost for the space segment of the program could be from $150 to $200 million. This does not include development and procurement costs for the earth stations and ground terminals. In addition, he estimated the annual operating cost for the proposed satellite would be approximately $54 million. He concluded, therefore, that a 10-year total program cost for the ERCP could range from $500 million to $1 billion.

Although not precise by any means, these costs certainly cast doubt as to whether the proposed program is affordable. Judging from the concerns expressed by several States, it is highly unlikely they will be able to participate in the program, unless Federal funding assistance is provided.

## FEDERAL POLICY FOR SATELLITE COMMUNICATIONS DOES NOT SUPPORT PROPOSED PROGRAM

The Government has long been committed to satellite communications and to growth of a vigorous commercial satellite industry. That industry has benefitted greatly from Government-funded research and development and has emerged to serve domestic, as well as international, needs. The existing commercial systems, however, have neglected to develop satellite technologies and services to serve large groups of the public service sector, including police, public safety, firefighting, search and rescue, and post-disaster restoration. Instead, existing commercial systems are designed to serve the high-volume communications user centralized in major urban areas.

In contrast, many public service users need short-term, intermittent, and low-volume communications throughout dispersed and rural areas. Such public service users cannot afford the sophisticated and expensive systems now in use, and commercial carriers do not consider it profitable to launch high-power satellites to serve this community. Because service to this market has not proven to be profitable, it has not been offered.

Recognizing this, the President, in October 1978, issued a Directive on Civil Space Policy. In that directive, the National Telecommunications and Information Administration (NTIA) was charged with:

--Combining the potential low-volume public service users of communications satellite services. By consolidating users, service to them might be less expensive and more profitable for commercial enterprises to provide.

--Stimulating research and development of inexpensive satellite technology and services appropriate to the low-volume public sector users.

--Translating NTIA's experience into programs for lesser developed countries.

To achieve these three missions, NTIA established the Dispersed Users Satellite Program. Its special goal is to encourage businesses to develop a new generation of commercial systems to meet public service needs and then to provide these services. (This program is more fully discussed on p. 20.)

## Two Government programs with similar purposes contradict each other

The Dispersed Users Satellite Program was initiated while the working group was developing the ERCP. In many aspects, these two programs are similar. Both seek to provide satellite communications services to dispersed users involved in such functions as law enforcement, emergency medical services, search and rescue, and post-disaster restoration. Both also seek to consolidate this market to make the satellite services affordable to the intended users.

However, there are major differences in the programs. The President's October 1978 Directive on Civil Space Policy and the Dispersed Users Satellite Program call for private industry, drawing on technology already available, to provide the appropriate satellite services. In contrast, the ERCP calls for intensive Government research and development to provide the desired technology. Government funding would be required to provide the technology, since private industry has not found it profitable to provide this type of service.

Relying upon the Government to develop and provide the ERCP is not consistent with the President's directive. It is certainly contrary to the efforts of the Dispersed Users Satellite Program, which are to consolidate the dispersed users, so private industry would find it profitable to serve this market. The Interagency Committee, however, did not recognize these differences in its June 1979 report.

## CHAPTER 4

## DECENTRALIZATION OF FEDERAL TELECOMMUNICATIONS CAUSES CONFUSION AND DUPLICATION

When the Office of Telecommunications Policy was abolished and authority and responsibility for telecommunications was dispersed, Federal agencies' telecommunications roles and responsibilities became uncertain and often duplicative. This affected the proposed ERCP, whose scope falls within the responsibility of several agencies. It also compounded the problems the Interagency Committee working group had in developing the ERCP, especially determining a course of action for it.

### THE DECENTRALIZATION

Executive Order 12046, effective March 26, 1978, abolished the Office of Telecommunications Policy and transferred its functions to the Department of Commerce (NTIA); OMB; National Security Council; Office of Science and Technology Policy; Department of State; General Services Administration; and Domestic Policy Staff. Some of the functions transferred to General Services were later transferred to FEMA.

Viewed individually, these Federal departments and agencies appear to have clearly defined roles. And, ostensibly, they do the work assigned by various laws, orders, and policies affecting telecommunications. Unfortunately, however, their roles have not been thoroughly clarified.

### THE CONFUSION CAUSES DELAYS

With several Federal agencies responsible for reviewing and monitoring Government telecommunications, the working group was not sure how to direct its completed report through the approval and implementation process. The result of this has been a 9-month period in which the report was in processing limbo. An indication of the confusion surrounding the report is that several Federal agencies and private organization officials suggested alternative courses of action for implementing the ERCP.

In early December 1978, the group solicited the National Communications System Manager's support for the proposed program. In response, the Manager indicated that his organization would be most interested in the proposed program and suggested that the final report on the proposed program be

in the emergency communications area need to be clarified.

--The National Security Council did not comment on our evaluation of the ERCP. The Council disagreed with our conclusion that abolition of the Office of Telecommunications had resulted in confusion and uncertainty. It believes that Federal executive orders have clearly reallocated the authority for telecommunications issues.

--Although the Office of Science and Technology Policy agreed with our conclusions about the ERCP, it did not agree that further clarification was necessary in the area of Federal roles and responsibilities.

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As noted, the comments received range from full agreement to virtually total disagreement with our conclusions and recommendations. Overall, the vast majority of respondents overwhelmingly supported our views. Comments received focused primarily on two issues: our evaluation of the ERCP and our view that Federal agencies' and offices' roles and responsibilities for emergency communications need to be clarified.

FEMA was the only agency which disagreed with our evaluation of the ERCP. All other agencies and offices commenting agreed with our conclusions. FEMA's disagreement with us is surprising in view of the overwhelming concurrence voiced by other Federal agencies and offices, many of which participated directly in the ERCP effort.

On the second issue relating to the need to clarify Federal agencies' and offices' roles and responsibilities for emergency communications, the reaction was mixed. Eight respondents agreed with our conclusions and recommendations and four disagreed. OMB, the Office of Science and Technology

it be reviewed and forwarded with comments to the President. The report actually was sent to FEMA on March 18, 1980. This was 9 months after the report was completed and ready for action, a result of both confusion born of decentralized management of communications and an unreliable report. During this period, no substantive changes were made to the ERCP report.

A more immediate problem is that the agency chosen to review the report may still not be the appropriate one. Delays may continue as a result.

FEMA was established in 1979 to improve Federal emergency management and assistance. It consolidated emergency preparedness and response activities previously assigned to five agencies.

As a matter of national policy, essential elements of the Government must be able to communicate during times of a natural disaster, periods of international crisis, and in the event of a nuclear attack. Inherent, therefore, in FEMA's mission is the need for communications. However, FEMA does not have the lead role in developing policies regarding national telecommunications matters. Also, FEMA's mission does not encompass all the activities envisioned by the ERCP, such as emergency medical services and law enforcement. Therefore, we question the Interagency Committee's decision to forward its report to FEMA for further action.

Some FEMA officials also have questioned the decision. In addition, they expressed concern that the ERCP does not fall entirely within their agency's jurisdiction. However, because of the deficiencies and concerns discussed in chapters 2 and 3, we doubt that FEMA will be willing to forward the report to the President.

## FRAGMENTED MANAGEMENT FOSTERS INEFFICIENCY AND DUPLICATION

The confusion and uncertainty about the management of Federal telecommunications are symptomatic of a problem which is far greater than the deficiencies associated with the ERCP. The problem is that no one person or office serves as a focal point with authority and responsibility to coordinate all aspects of Federal telecommunications. The organization and functioning of the Federal telecommunications structure are extremely complex, with responsibilities widely dispersed. Overlap occurs at all levels. This fragmented organizational arrangement makes it difficult, if not impossible, to avoid

independent uncoordinated actions and results in duplicative, inefficient, and ineffective efforts to improve emergency communications.

Effective management requires that everyone have a clear understanding of the objectives, responsibilities, authority, and organizational structure for telecommunications matters. When more than one Government agency has responsibility for the same function, duplication and inconsistency in the use of public funds are possible. This has occurred in attempts to improve emergency communications capability.

The ERCP was not the only attempt at improving emergency communications capabilities. The Defense Civil Preparedness Agency, which was consolidated into FEMA, developed and proposed an Emergency Satellite Communications System at the same time the Interagency Committee was developing its program. Both systems are similar in many aspects.

In September 1978 the Defense Civil Preparedness Agency concluded that high powered communications satellites and small, unsophisticated, inexpensive, highly transportable ground terminals operating in uncongested frequencies could be used for disaster relief efforts. Therefore, the Agency developed and released to private industry a request for quotation in November 1978--about the same time the working group held the last of its four regional meetings to determine user requirements for its proposed program. The request for quotation identified requirements for the proposed lease of a satellite communications system. The proposed system was expected to become operational during the summer of 1981 and provide each State with a 4-hour emergency communications restoration capability.

Shortly after the request for quotation was issued, opposition to it developed within the Government. For example, a letter from NTIA stated that

> "* * * the proposed procurement appears to violate several important policies such as those dealing with the procurement process, the need for prior spectrum support, institutional limitations on resale, and the preservation of proper separation between state/local and federal roles. Our review also raised some questions about the cost-benefit of the particular approach you have adopted."

The Defense Civil Preparedness Agency ultimately withdrew its request for quotation because, among other things, the responses from satellite venders indicated that developing the required technology would be too expensive.

A second program--the Dispersed Users Satellite Program--was established during the period of the ERCP's development to stimulate a new generation of commercial systems to meet public service needs. NTIA set up this 4-year program with the assistance of the Interagency Committee on Satellite Telecommunications Applications. This Committee, composed of representatives from 18 Federal agencies, has actively pursued two lines of inquiry. One pursuit has been the implementation of networks for one-way distributed video with two-way audio communications, building on previous Government subsidized experiments. With a 4-year budget from NTIA, the Dispersed Users Satellite Program is seeking wholesalers to buy commercial satellite services for resale to public service users at affordable bulk rates. When the demands are sufficiently aggregated, the Federal subsidy will no longer be required. The Committee's other major pursuit is to define the public service needs for satellite voice and data communications services. These public services include police and public safety, firefighting, search and rescue, and post-disaster restoration--essentially the same services covered by the ERCP. The Committee is trying to develop a concept for the implementation, operation, and management of a system to meet such needs on a State, regional, and national level.

In February and March 1980 FEMA advised several Federal agencies that it was establishing an interagency committee to assist in developing emergency response satellite communications capability. Those agencies were DOD, the General Services Administration, NASA, and NTIA. Each agency was requested to provide a representative.

In responding to FEMA's request for representatives to this committee, the Deputy Secretary of Defense said in March 1980:

> "My one concern is that we not prematurely settle on a solution that is solely driven by satellites, but rather examine the full spectrum of communications resources which could satisfy this vital need."

We share this concern because the ERCP working group began its study with the same premise--that a satellite was the solution to all communications deficiencies.

These three separate but clearly similar and interrelated efforts illustrate the duplication and inconsistencies which can occur when no focal point exists. As long as the current conditions of dispersed telecommunications responsibilities exist, such problems are likely to continue.

# CHAPTER 5

## CONCLUSIONS, RECOMMENDATIONS, AND AGENCY COMMENTS AND OUR EVALUATION

### CONCLUSIONS

The Interagency Committee working group, in developing its program, did not follow OMB's system acquisition policy. As a result, the working group decided on a communications system without first identifying and defining the need for it, and it also failed to explore alternative design concepts. The working group assumed, without basis, that a satellite communications system would meet the emergency communications requirements of all governmental agencies--local, State and Federal.

Therefore, we do not believe that the Interagency Committee's June 1979 report is a reliable document. It did not demonstrate to us that a satellite system is needed and, even if a satellite system is needed, there is no assurance the proposed system is the most efficient and effective.

In addition, there are serious questions about the cost and funding of the proposed system. Since the envisioned technology currently does not exist, a substantial amount of research and development would be required. Moreover, a number of potential users have already advised the Interagency Committee that they cannot afford an ERCP.

If the potential users are unable to fund the program, who will? The Interagency Committee decided that since private industry was neither providing nor planning to provide the type of service envisioned by the ERCP, the Government must provide the funding to perform the necessary research and development and to start the program. This decision, however, is inconsistent with the President's October 1978 Directive on Civil Space Policy which looked for private industry to provide needed services.

Because of the problems noted with the program and since NTIA is conducting another program with objectives similar to the ERCP, we believe no further action should be taken on the Interagency Committee's proposed program.

Of greater importance, however, is the lack of a focal point for Federal telecommunications matters. With the dissolution of the Office of Telecommunications Policy, the

authority and responsibility for telecommunications was dispersed among many Federal entities. This has resulted in confusion and uncertainty.

In our opinion, this decentralization has contributed to insufficient coordination and divisiveness among the various entities concerned with telecommunications and has led to duplication and inconsistencies in efforts to improve emergency communications.

## RECOMMENDATIONS

We recommend that the Director, Office of Management and Budget, in coordination with other Federal agencies and offices involved, clarify roles and responsibilities for emergency communications so that duplications and inconsistencies can be eliminated. Pending the clarification of roles and responsibilities, we also recommend that (1) no further action be taken on the Interagency Committee's Emergency Response Communications Program and (2) future efforts to develop a national emergency communications system be consistent with existing laws, policies, and regulations.

## AGENCY COMMENTS AND OUR EVALUATION

Comments on our draft of this report were received from the Departments of Commerce (NTIA), Defense, the Interior, and Transportation; the Federal Communications Commission; FEMA; the General Services Administration; NASA; the National Communications System; the National Security Council; the Office of Science and Technology Policy; and OMB. The Domestic Policy Staff orally advised us that it had no comments. The comments received totaled 33 pages. Because of the volume, only OMB's comments are included in full. (See app. I.) Corrections and clarifications of facts and statements in our draft suggested by the respondents have been incorporated, where necessary and appropriate, in this report. Comments received are summarized as follows:

--Commerce (NTIA) concurred that the Interagency Committee for Search and Rescue report was not adequate to serve as the basis for future planning and systems acquisition and that a clearer definition of the roles and responsibilities of the various Federal agencies regarding emergency response communications would be valuable. Commerce, however, felt that our conclusion regarding the confusion and uncertainty that resulted from the dissolution of the Office of Telecommunications Policy was somewhat misleading.

Commerce stated there was some initial confusion associated with the dissolution but that the responsibilities of the Federal agencies generally are well known now.

--DOD generally agreed that the examples cited in our report suggest a degree of confusion on roles and responsibilities for emergency communications. But, DOD did not believe the confusion and uncertainty were sole reasons for the duplication of effort discussed in our report. DOD agreed with our recommendation that Federal roles and responsibilities for emergency communications should be clarified. DOD believed the clarification should include all emergency communications roles and not just those of emergency "response" communications.

--Interior supported our conclusions and recommendations.

--Transportation agreed with our conclusions and recommendations. Transportation particularly supported the recommendation that the roles and responsibilities of various agencies in civil emergency response communications be clarified. Transportation believes that the lack of a single focal point for Federal emergency response communications has resulted in confusion and duplication of effort by several agencies having overlapping responsibilities in overall Federal telecommunications policy.

--The Federal Communications Commission concurred with our recommendations and stated that it does not appear that a limited use satellite communications system would prove cost effective. The Commission believed that it may be possible to provide a limited capacity emergency service using existing common carrier satellites so that the major cost would be the transportable terminals. The Commission would need to closely examine the use of dedicated satellites by Federal, State, and local governmental authorities and nongovernmental users because of the limited spectrum space allocated to domestic satellite service and the President's October 1978 Directive on Civil Space Policy (cited, in part, on pp. 14 and 15.)

--FEMA disagreed with our evaluation of the ERCP because it viewed the ERCP only as a preliminary concept of emergency response communications, not as a program for implementing a national emergency communications

system. FEMA also disagreed that the ERCP is inconsistent with the President's 1978 Directive on Civil Space Policy and that efforts to improve emergency communications have been independent, uncoordinated, duplicative, and inefficient. Rather, FEMA believes they have been ineffective to date--a situation which FEMA intends to change. FEMA also believes its charter provides a sound basis for continuing its review of the ERCP report under the auspices of its newly established Interagency Committee for Satellite Emergency Communications.

--The General Services Administration supports the need for viable emergency communications but does not recognize the ERCP proposal as the only alternative. General Services supports our conclusions, especially the observation that emergency communications need to be more formally focused and that a review of the national structure of roles and responsibilities is required.

--NASA shares our views on some of the weaknesses of the ERCP report but believes our criticisms are unjust in other cases. NASA believes the intent of the ERCP report was to present a concept to stimulate comment rather than to present a program for implementation of a communications systems. NASA also feels that the ERCP report has documented, although not adequately, a need for the kinds of capabilities described in the report. NASA also believes that our examples of duplication are more indicative of evolution than duplication, and that the ERCP is consistent with the President's Directive on Civil Space Policy. On the other hand, NASA does take issue with the ERCP report's implied conclusion that a dedicated program for an emergency response capability be implemented. NASA believes a lower cost, multiservice commercial approach can be developed and may prove to be economically self suppporting. NASA concurs that agency roles and responsibilities for emergency communications need to be clarified.

--The National Communications System concurs with our conclusions that no further action be taken on the ERCP until a definite need has been identified, and that future efforts to develop a national emergency communications system be consistent with existing laws, policies, and regulations. The organization does not agree the Federal roles and responsibilities

in the emergency communications area need to be clarified.

--The National Security Council did not comment on our evaluation of the ERCP. The Council disagreed with our conclusion that abolition of the Office of Telecommunications had resulted in confusion and uncertainty. It believes that Federal executive orders have clearly reallocated the authority for telecommunications issues.

--Although the Office of Science and Technology Policy agreed with our conclusions about the ERCP, it did not agree that further clarification was necessary in the area of Federal roles and responsibilities.

--OMB concurred with our evaluation that the ERCP report is unreliable. OMB said the weaknesses of the ERCP report apparently have led to its widespread lack of acceptance. OMB, however, did not agree that the decentralization of Federal telecommunications had caused confusion and duplication. OMB said that it would reserve detailed comment on our recommendations until after its review of our final report.

As noted, the comments received range from full agreement to virtually total disagreement with our conclusions and recommendations. Overall, the vast majority of respondents overwhelmingly supported our views. Comments received focused primarily on two issues: our evaluation of the ERCP and our view that Federal agencies' and offices' roles and responsibilities for emergency communications need to be clarified.

FEMA was the only agency which disagreed with our evaluation of the ERCP. All other agencies and offices commenting agreed with our conclusions. FEMA's disagreement with us is surprising in view of the overwhelming concurrence voiced by other Federal agencies and offices, many of which participated directly in the ERCP effort.

On the second issue relating to the need to clarify Federal agencies' and offices' roles and responsibilities for emergency communications, the reaction was mixed. Eight respondents agreed with our conclusions and recommendations and four disagreed. OMB, the Office of Science and Technology

Policy, the National Communications System, and the National Security Council did not agree that clarification was needed. These organizations believe published Executive Office guidance, which they believe clearly delineates the authority and responsibility for telecommunications, is adequate.

We recognize that Executive Office guidance has been issued which transfers functions formerly assigned to the Office of Telecommunications Policy to a number of Federal organizations. Despite this guidance, however, we believe the transfers of functions have created confusion about the specific responsibilities of the Federal agencies involved.

In commenting on our draft report, NASA said, "there is a pressing need for a clarification of agency roles and missions in this field." The General Services Administration stated that emergency communications need to be more formally focused and "a review of the national structure of roles and responsibilities is required." We believe these comments, as well as the concurrence expressed by 8 of the 12 respondents, highlight the need for clarifying Federal agencies' and offices' roles and responsibilities for emergency communications. Particularly noteworthy is that those organizations agreeing with us are at the operating level, whereas those organizations disagreeing are at the Executive Office level. We believe it is extremely important that organizations at all levels of the Government clearly and completely understand the lines of authority and responsibility for telecommunications issues.

APPENDIX I

EXECUTIVE OFFICE OF THE PRESIDENT
OFFICE OF MANAGEMENT AND BUDGET
WASHINGTON, D.C. 20503

Mr. Allen R. Voss
Director
General Government Division
General Accounting Office
Washington, D.C. 20548

June 17, 1980

Dear Mr. Voss:

We appreciate having an opportunity to review your draft report "Federal Roles and Responsibilities for Emergency Communications Need to be Clarified" (Code 941198). Your belief that the study prepared by the Interagency Committee on Search and Rescue which proposed the Emergency Response Communications Program (ERCP) was not reliable is well supported by the findings discussed in Chapters 1, 2 and 3 of this report. However, the premise of Chapter 4 that decentralization of Federal telecommunications causes confusion and duplication is troublesome. This premise is neither a logical conclusion drawn from the documented shortcomings of the Committee's efforts or of their proposed ERCP, nor can this premise be reasonably cited as the primary cause of the difficulties of the proposed program. My staff has prepared specific comments on the report which are attached to this letter to point out why the difficulties which the Committee confronted and the quality of the ERCP report should not be closely associated with any perceived deficiencies in the Federal government's organization for telecommunications policy and management.

The present Federal government organizational structure for telecommunications policy and management was established by Executive Order 12046 which abolished the Office of Telecommunications Policy and transferred its functions to a number of Federal establishments. The agencies named in this Executive Order have worked to carry out their responsibilities in a cooperative manner. Your opinion that "this coordination and divisiveness among the various entities concerned with telecommunications" lacks substantiation. This is not to say that improvements are not possible in the Federal government's organizational structure for telecommunications. H.R. 6410, the Paperwork Reduction Act of 1980, will significantly improve Federal information policymaking in telecommunications and in other areas. This Bill has recently passed the House by a wide margin and is currently undergoing consideration in the Senate.

In summary, we believe that your finding that the ERCP report was unreliable has been well documented. The weaknesses of the report itself apparently have led to its widespread lack of acceptance. Your contention that the decentralization of Federal telecommunications has caused confusion and duplication in this proposed program should not be cited as a factor of greater importance in affecting the outcome of the ERCP proposal.

We will reserve detailed comment upon your recommendations until we have had an opportunity to review the final report.

Sincerely,

Jim J. Tozzi
Assistant Director for
Regulatory and Information Policy

Enclosure

## Comments

GAO Draft Report "Federal Roles and Responsibilities for Emergency Communications Need to be Clarified " (Code 941198)

The authority and sponsorship under which the Interagency Committee on Search and Rescue was established are not clearly specified in your report. It would seem natural for a committee such as this to work through its parent or sponsoring department in order to present its recommendations. Instead, the committee apparently tried to shop around for a sponsor as the ERCP report was nearing completion. It is not surprising that a willing sponsor could not be readily found to support a report which you describe as unreliable. Furthermore, your report does not clearly state to what degree participating members of the committee themselves supported the ERCP. It seems unlikely that the committee members were actually representing the views of their parent organizations if none of these organizations would agree to sponsor the committee-approved document.

Your contention that the fragmented management of Federal telecommunications fosters inefficiency and duplication is weakened significantly when the dates of involvement in this effort of various entities discussed are examined more carefully. The Interagency Committee was finalizing its report in early 1979 at about the same time that NTIA's Dispersed User Satellite Program was being established. Irrespective of the observation that there were major differences in mission and even philosophy between the committee committee and the NTIA program, the timing of their efforts alone would indicate little potential for coordination. The committee's report was completed before FEMA was officially organized so lack of coordination cannot be cited there, either. FEMA's establishment of a new interagency committee to study this issue in March, 1980, may be questioned. However, at that point in time, the Interagency Committee on Search and Rescue appeared to have concluded their study of the issue, their report had been (or was about to be) submitted to FEMA, and FEMA itself had to contend with the vestige of interest in this area within its own organization supplied by one of its components, the old Defense Civil Preparedness Agency (DCPA). Thus, there may have been some plausible justification for FEMA to undertake such an approach.

APPENDIX I



There is a more serious question about the justification for DCPA's involvement in an emergency communications satellite program. OMB formally questioned this involvement in a letter from the Executive Associate Director for Reorganization and Management to the Director of DCPA on December 29, 1978, and in a letter from the Director to the Deputy Secretary of Defense on May 21, 1979.

Your report also suggests that the fragmented organization of the Federal telecommunications management structure contributed to the delay and confusion in considering the ERCP proposal. An argument can be made instead that the committee itself did not proceed in an efficient and effective manner in presenting their proposal. Your report states that in December, 1978, the Manager of the National Communications System (NCS) expressed interest in the proposed program and suggested that the report be forwarded to the NCS for review and further action. Your report does not clearly state why this option was not pursued. The ERCP report was finally submitted to the Secretary of Transportation in June, 1979, although your report does not clearly state why this choice was made. The ERCP report was returned by the Acting Deputy Secretary of Transportation in August, 1979, who cited the need for additional work. In January, 1980, the committee agreed to send the ERCP report to FEMA but did not formally transmit the report until March. Your report does not give specific reasons for these periods of delay and does not indicate whether substantive changes were made to the ERCP report as suggested by the Department of Transportation.

The role of the Office of Telecommunications Policy (OTP) in guiding and supporting the Interagency Committee and the ERCP effort in its early stages is not well documented in your report. You note that a representative of that office was invited to a meeting at Eglin Air Force Base in March, 1978, to discuss emergency communications requirements. Your report states that a key decision was made by all present at this meeting to pursue a National Emergency Response Satellite Communications Program. Yet your report does not state who was present at the meeting. Your report notes that OTP was abolished by Executive Order at about this time; however, your report does not indicate what level of support OTP was giving to this effort prior to its abolition or what level of support was given by agencies which assumed the responsibilities of OTP after its abolition. Therefore, your conclusion that the dissolution of OTP resulted in confusion and uncertainty in this program is not well substantiated.

APPENDIX I

A final comment about your report concerns your finding that the ERCP report was unreliable in part because of its failure to establish a need for the program. The establishment and justification of mission need is an essential first step in undertaking any major program. If an adequate mission need statement had been prepared for this program, it could very well have turned out that a telecommunications system might not be the central concern. The true focus of improving emergency response perhaps should be upon organizational structures for providing these services or on Federal-State-local relationships or on some other concern which transcends the telecommunications issue.

(941198)

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