

FirstNet Authority Failed to Provide Adequate Contract Oversight for Its Initial Two Reinvestment Task Orders

REDACTED FINAL REPORT NO. OIG-23-012-A

MARCH 1, 2023

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Final Report Contains Information Marked
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INFORMATION



U.S. Department of Commerce
Office of Inspector General
Office of Audit and Evaluation




March 1, 2023

MEMORANDUM FOR: Jeremy Pelter
Chief Financial Officer and Assistant Secretary
for Administration
U.S. Department of Commerce

Alan Davidson
Assistant Secretary of Commerce for Communications
and Information and NTIA Administrator
National Telecommunications and Information Administration

Lisa Casias
Acting Executive Director
First Responder Network Authority

FROM:



Arthur L. Scott, Jr.
Assistant Inspector General for Audit and Evaluation

SUBJECT:

*FirstNet Authority Failed to Provide Adequate Contract Oversight for Its
Initial Two Reinvestment Task Orders*
Final Report No. OIG-23-012-A

Attached for your review is our final report on our audit of the First Responder Network Authority's (FirstNet Authority's) oversight of its first two reinvestment task orders (TOs). This report is one in a series of reports covering FirstNet Authority's reinvestment process. Our audit objective was to determine whether FirstNet Authority's process for reinvesting fee payments is effective and consistent with established practices, procedures, and regulations.

We found the following:

- I. FirstNet Authority did not have sufficient performance measurements in the Quality Assurance Surveillance Plan to adequately assess contractor performance for its first two reinvestment TOs.
- II. FirstNet Authority did not perform independent verification of contractor performance regarding deployables.
- III. FirstNet Authority contracting officer's representatives relied on Nationwide Public Safety Broadband Network (NPSBN) Program Management Office personnel that are not certified or formally appointed to conduct contract monitoring.
- IV. FirstNet Authority's Senior Management Council reviews were not conducted in a transparent manner for the NPSBN reinvestment TOs.

On January 20, 2023, we received the National Telecommunications and Information Administration's (NTIA's) response to our draft report. NTIA concurred with all the recommendations and described actions it intends to take to address them. NTIA's formal response also included a comment letter from FirstNet Authority. NTIA's formal response and FirstNet Authority's comment letter are included within the final report as appendix B.

Pursuant to Department Administrative Order 213-5, please submit to us an action plan that addresses the recommendations in this report within 60 calendar days. This final report will be posted on OIG's website pursuant to sections 4 and 8M of the Inspector General Act of 1978, as amended (recodified at 5 U.S.C. §§ 404 & 420). At the request of FirstNet Authority, redactions have been placed in this report and memorandum to cover sensitive information about AT&T's proprietary values protected by the Trade Secrets Act, 18 U.S.C. § 1905.

Pursuant to Pub. L. No. 117-263, Section 5274, non-governmental organizations and business entities specifically identified in this report have the opportunity to submit a written response for the purpose of clarifying or providing additional context to any specific reference. Any response must be submitted to Analee Striner-Brown, Division Director, at astriner-brown@oig.doc.gov and [OAE ProjectTracking@oig.doc.gov](mailto:OAE_ProjectTracking@oig.doc.gov) within 30 days of the report's publication date. The response will be posted on our public website. If the response contains any classified or other non-public information, those portions should be identified as needing redaction in the response and a legal basis for the proposed redaction should be provided.

We appreciate the cooperation and courtesies extended to us by your staff during our audit. If you have any questions or concerns about this report, please contact me at (202) 577-9547 or Analee Striner-Brown, Director for Telecommunications, at (202) 893-8759.

Attachment

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Report in Brief

March 1, 2023

Background

The Middle Class Tax Relief and Job Creation Act of 2012 established the First Responder Network Authority (FirstNet Authority) as an independent authority within the National Telecommunications and Information Administration (NTIA) to ensure the building, deployment, and operation of the Nationwide Public Safety Broadband Network (NPSBN) dedicated to first responders. In 2017, FirstNet Authority entered into a 25-year contract with AT&T for the construction and operation of the NPSBN. The contract includes (a) the initial obligation of up to \$6.5 billion, (b) AT&T's use of dedicated broadband spectrum, and (c) scheduled payments from AT&T to FirstNet Authority during the contract for use of the dedicated spectrum. FirstNet Authority must reinvest funds received from payments that were not used for operations back into the network to construct, maintain, operate, and improve the NPSBN.

In June 2020, the FirstNet Authority Board approved its first two reinvestment opportunities that added task orders (TOs) to the NPSBN contract. FirstNet Authority's oversight activities regarding the NPSBN contract are comprised of, but not limited to, the review and acceptance of deliverables and Quality Assurance Surveillance Plan (QASP) items. We audited the FirstNet Authority reinvestment process due to the importance of the network to first responders and the substantial amount—approximately \$15 billion—that will be reinvested in the network over the next several years.

Why We Did This Review

Our audit objective was to determine whether FirstNet Authority's process for reinvesting fee payments is effective and consistent with established practices, procedures, and regulations. This report focuses on whether FirstNet Authority had effective processes for contract oversight of its initial two reinvestments.

FIRST RESPONDER NETWORK AUTHORITY

FirstNet Authority Failed to Provide Adequate Contract Oversight for Its Initial Two Reinvestment Task Orders

OIG-23-012-A

WHAT WE FOUND

We found that FirstNet Authority did not adequately assess contractor performance of its initial two reinvestments. Specifically,

- I. FirstNet Authority did not have sufficient performance measurements in the QASP to adequately assess contractor performance for its first two reinvestment TOs.
- II. FirstNet Authority did not perform independent verification of contractor performance regarding deployables.
- III. FirstNet Authority contracting officer's representatives relied on NPSBN Program Management Office personnel that are not certified or formally appointed to conduct contract monitoring.
- IV. FirstNet Authority's Senior Management Council (SMC) reviews were not conducted in a transparent manner for the NPSBN reinvestment TOs.

WHAT WE RECOMMEND

We recommend that the Assistant Secretary of Commerce for Communications and Information and NTIA Administrator direct FirstNet Authority's Chief Executive Officer and Chief Procurement Officer to do the following:

1. Modify the current QASP to ensure that NPSBN contract QASP items, for TOs 6 and 7, are complete and sufficiently detailed to measure the contractor's performance regarding the quality of NPSBN services expected to be provided for the respective TOs.
2. Ensure the QASP is adequately updated for future reinvestment TOs and QASP items are complete and sufficiently detailed to measure the contractor's performance regarding the quality of NPSBN services expected to be provided for the TOs.
3. Strengthen FirstNet Authority's contract monitoring activities, including conducting on-site surveillance activities to verify services are provided.
4. Ensure that any personnel conducting surveillance activities on the NPSBN are appointed, in writing, and complete any necessary training and certifications as required by the *Commerce Acquisition Manual* and/or the Federal Acquisition Regulation.

We recommend that the Assistant Secretary of Commerce for Communications and Information and NTIA Administrator direct FirstNet Authority's Chief Executive Officer to do the following:

5. Ensure that SMC meetings are conducted in a transparent manner by allowing our attendance or providing an alternative that clearly and comprehensively demonstrates FirstNet Authority's oversight.
6. Ensure management discussions and decisions are fully documented with sufficient detail to (a) support adequate investment oversight and (b) justify key decision approvals.

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Cover: Herbert C. Hoover Building main entrance at 14th Street Northwest in Washington, DC. Completed in 1932, the building is named after the former Secretary of Commerce and 31st President of the United States.

Background

The Middle Class Tax Relief and Job Creation Act of 2012 (the Act) established the First Responder Network Authority (FirstNet Authority) as an independent authority within the National Telecommunications and Information Administration (NTIA) to ensure the building, deployment, and operation of the Nationwide Public Safety Broadband Network (NPSBN) dedicated to public safety.¹

On March 28, 2017, FirstNet Authority² entered into a 25-year indefinite-delivery, indefinite-quantity contract with AT&T (the contractor) for the construction and operation of the NPSBN. FirstNet Authority's NPSBN contract includes (a) the initial obligation of up to \$6.5 billion, (b) the contractor's use of dedicated broadband spectrum, and (c) scheduled payments³ from the contractor to FirstNet Authority over the life of the contract for use of the dedicated spectrum. FirstNet Authority will receive \$18 billion in contractor payments over a 25-year span.

FirstNet Authority must reinvest funds received from payments that were not used for operations back into the network to construct, maintain, operate and improve the NPSBN.⁴ Of the \$18 billion to be received from AT&T over 25 years, approximately \$15 billion is expected to be reinvested in the NPSBN. FirstNet Authority has already received six payments totaling \$795 million, with the next payment to be made in September 2023. In June 2020, the FirstNet Authority Board approved its first two reinvestment opportunities that added task orders (TOs) to the NPSBN contract:

1. TO 6 (Deployables) expanded deployable⁵ capabilities and services, cost \$ [REDACTED] million, and included options to extend to \$ [REDACTED] million.
2. TO 7 (5G Upgrade) facilitated an initial generational upgrade to the FirstNet Core,⁶ cost \$ [REDACTED] million, and included options to extend to \$ [REDACTED] million.

¹ See Pub. L. No. 112-96, *Middle Class Tax Relief and Job Creation Act of 2012*, §§ 6204(a), 6206(b).

² The U.S. Department of the Interior—on behalf of the U.S. Department of Commerce and FirstNet Authority—signed the contract. The management of the contract was then transferred from the U.S. Department of the Interior to FirstNet Authority in December 2017.

³ Amounts received by FirstNet Authority vary based on the NPSBN contract.

⁴ Pub. L. No. 112-96, § 6208(d).

⁵ The NPSBN contract defines a *deployable* as “[t]ransportable equipment principally in a vehicle to provide network services to users when augmenting network capacity or coverage is required for planned or unplanned events.”

⁶ The FirstNet Core “acts as the nervous system of the network, separates all public safety traffic from non-public safety user traffic, and enables differentiated services for network users.” See First Responder Network Authority, February 2021. *Rising to the Challenge: Fiscal Year 2020 Annual Report to Congress*. Reston, VA: FirstNet Authority, pg. 21. Available online at https://firstnet.gov/sites/default/files/FY2020_annual-report-FirstNetAuthority.pdf (accessed March 21, 2021).

The Board approved investment funds totaling \$218 million for these first two reinvestments.⁷ The \$218 million amount is less than the total expected contract costs of the two reinvestment task orders. FirstNet Authority requested that we not disclose the current total value of the task orders. FirstNet Authority views the values as a trade secret of AT&T that has not been publicly disclosed.

The Deployables TO expanded FirstNet Authority's dedicated deployable fleet by adding services to support an additional 15 units to its existing fleet of 72. The deployable units included Satellite Cell on Light Trucks, command and coverage vans,⁸ and Satellite Runners (SatRunners)⁹ available to respond to catastrophic incidents, noncatastrophic incidents, and preplanned events.

The 5G Upgrade TO was for phase I (of potentially 3 phases) and adds a 5G Option 3X¹⁰ capability to the FirstNet Core. Specifically, the upgrades funded through this TO allow public safety subscribers with 5G-capable devices and an appropriate rate plan access to the 5G functionality. The 5G phase I includes access to three areas: the contractor's millimeter wave (mmWave),¹¹ mid-band spectrum,¹² and FirstNet Authority-dedicated Option 3X Core. However, in phase I, quality of service, priority and preemption, and all mission-critical services remain on the Long-Term Evolution (LTE) Core, which is the original network core.

FirstNet Authority's oversight activities regarding the NPSBN contract, including the Deployables and 5G Upgrade TOs, are comprised of, but not limited to, the review and acceptance of deliverables and Quality Assurance Surveillance Plan (QASP) items.

FirstNet Authority program area leads and subject-matter experts (SMEs) review the artifacts received from AT&T, provide comments where appropriate, and send a recommendation regarding acceptance to the contracting officer's representative (COR). The COR then sends an acceptance or rejection memorandum to the contractor. However, the contracting officer (CO) is ultimately responsible for ensuring the contractor met the contract requirements.

We audited the FirstNet Authority reinvestment process, including oversight, due to the importance of the network to the nation's first responders and the substantial amount—i.e., approximately \$15 billion—that will be reinvested in the network over the next several years. In our October 2019 *Top Management and Performance Challenges Facing the Department of*

⁷ See FirstNet Authority, June 17, 2020. *FirstNet Authority Board Approves Network Investments for 5G, On-Demand Coverage* [online]. <https://www.firstnet.gov/newsroom/press-releases/firstnet-authority-board-approves-network-investments-5g-demand-coverage> (accessed November 14, 2022).

⁸ Command and communications vehicles, noted in the contract as command and coverage vans, provide connectivity via Long-Term Evolution and/or Wi-Fi. See FirstNet Authority. *FirstNet Deployable Fleet* [online]. <https://www.firstnet.gov/network/TT/deployables> (accessed February 8, 2022).

⁹ *SatRunners* are units that can be towed behind a sport utility vehicle, deployed by one person, and run for up to 60 hours between refueling.

¹⁰ According to TO 7, Option 3X is "the 4G Core upgraded to support both 4G and 5G access; control plane functions on 4G, [and] user plane on both 4G and 5G."

¹¹ *mmWave spectrum* consists of frequencies greater than 24 GHz.

¹² *Mid-band spectrum* accounts for spectrum bands that range between 6 MHz and 1 GHz.

Commerce report, we identified effectively and efficiently reinvesting capital to upgrade and modernize the NPSBN as a continuous challenge facing FirstNet Authority.¹³ Subsequent top management challenges reports have continued to state that reinvestment into the network is still a challenge.¹⁴ Additionally, in December 2021, we issued a report¹⁵ that identified issues with FirstNet Authority's oversight of the NPSBN contract.

¹³ U.S. Department of Commerce Office of Inspector General, October 16, 2019. *Top Management and Performance Challenges Facing the Department of Commerce*, OIG-20-001. Washington, DC: DOC OIG, pgs. 13–14.

¹⁴ See (1) DOC OIG, October 15, 2020. *Top Management and Performance Challenges Facing the Department of Commerce in Fiscal Year 2021*, OIG-21-003. Washington, DC: DOC OIG, pgs. 14–15; (2) DOC OIG, October 14, 2021. *Top Management and Performance Challenges Facing the Department of Commerce in Fiscal Year 2022*, OIG-22-001. Washington, DC: DOC OIG, pgs. 36–37; and (3) DOC OIG, October 13, 2022. *Top Management and Performance Challenges Facing the Department of Commerce in Fiscal Year 2023*, OIG-23-001. Washington, DC: DOC OIG, pgs. 26–29.

¹⁵ DOC OIG, December 14, 2021. *FirstNet Authority Must Increase Governance and Oversight to Ensure NPSBN Security*, OIG-22-011-1. Washington DC: DOC OIG.

Objective, Findings, and Recommendations

Our audit objective was to determine whether FirstNet Authority's process for reinvesting fee payments is effective and consistent with established practices, procedures, and regulations. This report specifically focuses on whether FirstNet Authority had effective processes for contract oversight of its initial two reinvestments. Appendix A provides a more detailed description of our scope and methodology.

We found that FirstNet Authority did not adequately assess contractor performance of its initial two reinvestments. Specifically, FirstNet Authority (1) did not have sufficient performance measurements in the QASP to adequately assess contractor performance for its first two reinvestment TOs; (2) did not perform independent verification of contractor performance regarding deployables; (3) CORs relied on NPSBN Program Management Office personnel that are not certified or formally appointed to conduct contract monitoring; and (4) Senior Management Council (SMC) reviews were not conducted in a transparent manner for the NPSBN reinvestment TOs. Consequently, FirstNet Authority cannot adequately assess the effectiveness of how \$ CUI million was spent on its initial two reinvestments. Implementing steps to address the identified weaknesses is essential to increase the likelihood that the government receives what it purchases and that the needs of public safety officials are addressed. In addition, FirstNet Authority denied our request to attend SMC meetings, which impacted our ability to perform our audit responsibilities of providing oversight of FirstNet Authority.

I. FirstNet Authority Did Not Have Sufficient Performance Measurements in the QASP to Adequately Assess Contractor Performance for its First Two Reinvestment TOs

FirstNet Authority did not include sufficient performance measures in the NPSBN contract's QASP to assess contractor performance for the Deployables and 5G Upgrade TOs. Per the NPSBN contract, "[t]he purpose of the QASP is to provide guidelines for assessing the Contractor's performance by describing the systematic methods used to identify and monitor acceptable levels of product and service performance." The Federal Acquisition Regulation (FAR) requires the CO to include appropriate quality requirements in the solicitation and contract.¹⁶ FAR states that "[p]erformance-based contracts for services shall include . . . [m]easurable performance standards (i.e., in terms of quality, timeliness, quantity, etc.) and the method of assessing contractor performance against performance standards."¹⁷ Additionally, FAR states that QASPs "should be prepared in conjunction with the preparation of the statement of work. The plans should specify- (1) [a]ll work requiring surveillance; and (2) [t]he method of surveillance."¹⁸

¹⁶ Federal Acquisition Regulation 46.201.

¹⁷ FAR 37.601.

¹⁸ FAR 46.401.

We reviewed the NPSBN contract's QASP and found that the QASP included only one performance measurement for deployables, a 14-hour recovery time objective (RTO), which states that the contractor should provide a deployable unit for an accepted emergency event¹⁹ within 14 hours. However, the QASP does not include performance measures to assess the response time, or other measures, for urgent or planned events.²⁰ For the reporting periods between September 2020 and September 2021, AT&T reported the following deployable activity.

Table I. Accepted Deployable Requests and Classification

Deployment Types	Sept 2020 - Feb 2021	Mar 2021 - Sept 2021	Total	Percent of Total
Emergency	CUI	CUI	CUI	34%
Urgent	CUI	CUI	CUI	55%
Planned	CUI	CUI	CUI	11%
Total	CUI	CUI	CUI	100%

Source: Office of Inspector General analysis of FirstNet Authority contract oversight documents and Deployables and Temporary Coverage Solution reports

FirstNet Authority requested that our office not disclose the number of deployments outlined in the above table. FirstNet Authority views the values as controlled unclassified information that has not been publicly disclosed. However, FirstNet has publicly stated that “more than 800+ solutions were deployed in 2021.”²¹

As illustrated above, FirstNet Authority only included a performance measure for the response time of 34 percent of asset deployments. Further, AT&T is responsible for classifying the deployment type, which increases the risk that the contractor could rate events as “urgent” when it knows it cannot meet the 14-hour RTO.

Additionally, we found that the QASP does not include performance measures to assess the quality of the services provided by a deployable asset once it reaches its destination. The QASP lacks metrics to measure whether public safety entities can connect to the network through the deployable or whether the data transmission rate²² is sufficient to meet public safety needs.

¹⁹ The NPSBN contractor, AT&T, determines whether an event is categorized as an emergency and is accepted. The contractor defines an emergency event as “serious, unexpected, and often dangerous situations requiring immediate action.”

²⁰ The NPSBN contract defines an urgent event as “requests for critical support with an on-site request time of longer than 14 hours from the time of the request,” and planned events as “scheduled 30 days in advance of the event.” The contractor notes that “[t]he RTO does not apply to Planned Events or Urgent Events.”

²¹ See FirstNet Authority, March 2022. *Understanding the FirstNet Deployable Program* [online]. https://www.firstnet.gov/system/tdf/Deployables_factsheet_2022_March.pdf?file=1&type=node&id=1342 (accessed January 27, 2023).

²² The data transmission rate is referred to as throughput in the NPSBN contract.

Similarly, FirstNet Authority did not include comprehensive 5G Upgrade performance metrics in the contract to measure the quality of services offered by the Option 3X Core. FirstNet Authority included only two 5G Upgrade QASP items, which measure how often the 5G service is available²³ and the rate of successful data transmission for mmWave (only a piece of the spectrum). However, the QASP did not include measurements to monitor data loss or delay²⁴ while using 5G services, both of which are common measures of network performance, and data transmission time on the Option 3X Core. Unlike the contractor's LTE Core, FirstNet Authority does not measure whether users could successfully establish and retain links to the network when uploading or downloading data on the Option 3X Core. With the transmission QASP line item, FirstNet Authority noted "TBD" (to be determined) in the performance standard, acceptable performance level, and performance targets fields. FirstNet Authority officials stated that FirstNet Authority was waiting for the Option 3X Core to be deployed prior to finalizing the performance standard, acceptable performance level, and performance targets. However, having the quality requirements for transmission defined prior to 5G Upgrade TO approval would have enabled the contractor to build the Option 3X Core based on those requirements.

These deficiencies occurred because FirstNet Authority's CO did not ensure appropriate quality measurements were included in the QASP. The lack of adequate QASP items for FirstNet Authority investments inhibits FirstNet Authority's ability to provide effective oversight, thereby increasing the risks that the contractor will not provide the quality of services the government paid for in the amount of \$CUI million and that public safety entities seek. Failure to meet the needs of the public safety community could result in a lack of confidence in the NPSBN.

Recommendations

We recommend that the Assistant Secretary of Commerce for Communications and Information and NTIA Administrator direct FirstNet Authority's Chief Executive Officer and Chief Procurement Officer to do the following:

1. Modify the current QASP to ensure that NPSBN contract QASP items, for TOs 6 and 7, are complete and sufficiently detailed to measure the contractor's performance regarding the quality of NPSBN services expected to be provided for the respective TOs.
2. Ensure the QASP is adequately updated for future reinvestment TOs and QASP items are complete and sufficiently detailed to measure the contractor's performance regarding the quality of NPSBN services expected to be provided for the TOs.

²³ How often the 5G service is available is referred to as availability in the NPSBN contract.

²⁴ Data delays—often referred to as "jitter"—are small, intermittent delays that occur during data transmission.

II. FirstNet Authority Did Not Perform Independent Verification of Contractor Performance Regarding Deployables

FirstNet Authority did not conduct on-site surveillance of deployables to ensure that the assets provided the support public safety entities needed. Instead, FirstNet Authority relied on contractor self-reporting to determine the contractor's performance. The FAR states that (1) agencies shall ensure that services tendered by contractors meet contract requirements²⁵ and (2) contracting offices are responsible for verifying that the contractor fulfills contract quality requirements.²⁶ Additionally, the FAR states that “[g]overnment contract quality assurance shall be performed at such times . . . and places . . . as may be necessary to determine that the supplies or services conform to contract requirements.”²⁷

FirstNet Authority officials stated that they do not independently verify the contractor's performance. For example, FirstNet Authority does not perform on-site surveillance of deployables, which would provide firsthand knowledge of whether the deployables are functioning when they arrive at an event and whether they provide the services to meet first responder needs.

Additionally, we reviewed public safety feedback collected by FirstNet Authority in fiscal year 2021 and found that, of the 95 records specific to deployables, more than 31 percent of the feedback was negative based on our assessment of the feedback provided. As an example of the feedback provided, 12 individuals stated that the deployable either (1) did not meet public safety needs because the deployable was delayed and/or no longer needed when it arrived; (2) was not compatible with public safety devices; (3) caused interference with other services; (4) was not functional; or (5) could not reach the site needed to provide adequate coverage. For example:

- Feedback from a fire department stated that a deployable didn't arrive until two days after it was requested for a search and rescue mission, and a local telecommunications company was able to provide a coverage solution prior to the deployable's arrival.
- Feedback from a National Guard unit stated that they requested a deployable for a network outage during the 2020 Nashville bombing, but the deployable was defective and it was no longer needed by the time it was repaired.
- Feedback from an emergency management unit stated that AT&T brought deployables to a race due to poor data transmission on FirstNet devices during the event; however, FirstNet devices were not working with the deployables and the issue was not resolved during the event.

Furthermore, an additional 12 individuals stated concerns with the process to request a deployable. For example:

²⁵ FAR 46.102.

²⁶ FAR 46.103.

²⁷ FAR 46.401.

- Feedback from a fire department stated it took 42 minutes to request a deployable from AT&T for a wildfire in California while the process only took 3 minutes with a competitor.
- Feedback from a county 911 center stated that a request for a deployable was made for a storm, but the AT&T representative processing the request did not take it seriously and AT&T only dispatched a deployable after the network went offline due to a power outage.
- Feedback from a police department stated that there was difficulty requesting a deployable because its AT&T representatives were unavailable, and it was confusing to figure out how to request a deployable without those contacts.

Although FirstNet Authority receives feedback from public safety entities, it does not specifically solicit or use the feedback to assess contractor performance. We performed our own verification of the public safety feedback. Specifically, we interviewed 13 public safety contacts who provided neutral or negative feedback to FirstNet Authority regarding deployables in fiscal year 2021 to gather specific information regarding their deployment experience. Seven of the contacts stated that multiple carriers were needed at the emergency site to allow first responders to connect to internet services. For example, the Emergency Operations Battalion Chief of a fire department stated that he requested service from multiple carriers because not all first responders are FirstNet customers, and in his experience, a competitor was able to respond faster. Additionally, five of the contacts reported that the deployable asset provided by AT&T did not provide adequate coverage, and three contacts stated that transmission capacity was inadequate. For example, an emergency manager stated that in response to the 2020 Nashville bombing, AT&T placed a deployable in a location where it could not be fully extended, which impacted the coverage at his Emergency Operations Center.

Additionally, we found that the contractor's deployable performance reports, which FirstNet Authority relies on to assess contractor performance, were not accurate. The NPSBN contract includes the following performance targets based on the number of deployable requests meeting the 14-hour RTO: Blue: 96–100 percent (excellent); Green: 90–95 percent (good); Yellow: 85–89 percent (marginal); and Red: less than 85 percent (poor). We reviewed contractor self-assessments regarding Deployable 14-hour RTO performance for two reporting periods (September 2020–February 2021 (DR1) and March 2021–September 2021 (DR2) and reconciled the reports to the underlying data the contractor used to determine the ratings. Although the contractor reported “good” and “excellent” performance for respective periods, we found that the underlying data only supported “marginal” and “good” performance. We found that the discrepancies were due to the contractor's use of data that should have been excluded from the performance calculation. Specifically, the contractor included 44 of 98 (45 percent) and 47 of 124 (38 percent) invalid RTOs in the DR1 and DR2 reports, respectively. These records included RTO calculations for devices that did not meet the definition of a deployable as

noted in the NPSBN contract, such as cell site restoration, repeaters, and generators,²⁸ and instances where a deployable was requested but a deployable unit was never dispatched. Further, we noted that the NPSBN contract states a marginal rating is unacceptable performance. However, because FirstNet Authority did not verify or appropriately validate the contractor's self-assessed performance ratings, FirstNet was not aware of and did not hold the contractor accountable for the unacceptable performance.

FirstNet Authority's difficulty in providing oversight demonstrates a risk that raises significant concerns about its ability to manage performance or hold the contractor accountable. Also, without an effective verification process, the risk increases that FirstNet Authority will not identify issues that negatively impact the first responder customers who rely on network connectivity to effectively manage emergencies. Furthermore, FirstNet Authority's inadequate contract surveillance reduces its ability to ensure that reinvestments are constructing, maintaining, operating, or improving NPSBN services, as required by the Act.²⁹

Recommendation

We recommend that the Assistant Secretary of Commerce for Communications and Information and NTIA Administrator direct FirstNet Authority's Chief Executive Officer and Chief Procurement Officer to do the following:

3. Strengthen FirstNet Authority's contract monitoring activities, including conducting on-site surveillance activities to verify services are provided.

III. FirstNet Authority CORs Relied on NPSBN Program Management Office Personnel That are Not Certified or Formally Appointed to Conduct Contract Monitoring

We found that the CORs relied heavily on assistance from NPSBN Program Office personnel—such as TO leads (TOLs) and SMEs—to conduct NPSBN contract monitoring and surveillance activities; however, NPSBN Program Office personnel were not properly trained, certified, or formally appointed for performance surveillance functions.

FAR states that the CO is responsible for assigning certain contract responsibilities to the CORs, and the duties cannot be redelegated.³⁰ FAR defines the COR as “an individual, including a contracting officer's technical representative (COTR), designated and authorized in writing by a contracting officer to perform specific technical or administrative

²⁸ The NPSBN contract defines a deployable as “[t]ransportable equipment principally in a vehicle to provide network services to users when augmenting network capacity or coverage is required for planned or unplanned events.” Because cell site restoration is a normal part of providing internet services and repeaters and generators, on their own, cannot provide network services, these deployment types do not meet the definition of a deployable as noted in the NPSBN contract.

²⁹ Pub. L. No. 112-96, *Middle Class Tax Relief and Job Creation Act of 2012*, § 6208(d).

³⁰ FAR 1.602-2.

functions.”³¹ The *Commerce Acquisition Manual (CAM)* sets requirements regarding the appointment, competency, and acquisition training for CORs and individuals such as TOLs and SMEs with contracting responsibilities within its Contracting Officer Representative Certification Program. Specifically, the *CAM* states, “[t]he Federal Acquisition Certification for Contracting Officer Representatives (FAC-COR) Program is applicable to all individuals with delegated [COR] responsibilities for Department of Commerce contracts, including those designated as Assistant/Alternative [COR] or Task Managers.”³² The *CAM* further states, “[t]he functions and responsibilities of the CORs are performed by individuals with various assigned titles,” including task managers, and CORs “shall be appointed in writing.”³³ Lastly, the *CAM* defines a task manager as an individual who “is responsible for functioning as the technical representative of the [CO] for tasks awarded against a master contract, including surveillance personnel responsible for monitoring contractor performance.”³⁴ Although some NPSBN Program Office personnel have contract monitoring responsibilities consistent with *CAM*’s definition of a task manager, FirstNet Authority did not follow FAR and FAC-COR requirements for appointment and certification of its technical representatives (SMEs).

We found that FirstNet Authority COs did not issue appointment letters to TOLs and SMEs or require certification despite these personnel being responsible for performing duties similar to those delegated to CORs and assistant/alternate CORs. In its *FirstNet Acquisition Manual (FAM)*, FirstNet Authority assigned program managers the responsibility of “[s]erving as the COR during contract performance to monitor the contract from a technical and financial standpoint, evaluating the contractor’s performance, and conducting inspection and acceptance when applicable.”³⁵ However, FirstNet Authority COs did not formally appoint program managers to the NPSBN contract or delegate authority to conduct oversight activities. Further, FirstNet Authority’s *NPSBN Deliverable Management Processes*³⁶ (*DMP*) assigns technical review responsibilities to the TO teams and SMEs. Specifically, the *DMP* states that the TO team and SMEs, both within FirstNet Authority’s NPSBN Program Management Office, review contractor deliverables, provide comments on deliverables, and recommend approval or denial of the deliverables. Additionally, FirstNet Authority position descriptions for TOLs and SMEs specifically assign some NPSBN contract monitoring responsibilities to TOLs and SMEs. Through interviews and documentation review, we found that TOLs and SMEs were performing technical representative surveillance responsibilities as outlined and defined as task managers by the *CAM*. However, FirstNet Authority COs did not formally appoint TOLs or SMEs to the NPSBN contract or delegate authority to conduct oversight activities. If FirstNet Authority is going to rely on

³¹ FAR 2.101.

³² *CAM* 1301.670 § 1.3 (August 2020).

³³ *Ibid.*, § 1.7.1.

³⁴ *Ibid.*, § 1.7.1.3.

³⁵ FirstNet Authority, October 6, 2020. *FirstNet Acquisition Manual*, v.8. Reston, VA: FirstNet Authority, pg. 11.

³⁶ FirstNet Authority, May 9, 2019. *NPSBN Deliverable Management Processes*, version 0.4. Reston, VA. We noted that this process was effective at the time the TOs were approved. The process was revised on October 29, 2021, (version 5) and then revised and renamed as the *Nationwide Public Safety Broadband Network Deliverable Management Process Standard Operating Procedures* on January 21, 2022 (version 6). Version 6 continues to assign program area leads and SMEs responsibility for deliverable review, comments, and acceptance recommendation.

personnel other than the COR to perform contract monitoring activities, those personnel need to be appointed as required by the FAR and CAM. Specifically, the CAM states that “Assistant and Alternate CORs, Task Managers, including surveillance personnel, shall be appointed in accordance with the same requirements applicable to CORs.”³⁷

FirstNet Authority officials stated that SMEs and project leads are not officially designated under the NPSBN contract and, therefore, the COR certification program is not applicable. We disagree with FirstNet Authority’s interpretation because FirstNet Authority assigned oversight responsibilities to program management personnel, to include the TOLs and SMEs, in the *FAM*, *DMP*, and position descriptions; therefore, FAR appointment and FAC-COR requirements apply as outlined above. Discussions with FirstNet Authority officials disclosed that TOLs and SMEs are utilized along with the CORs to accept submissions from AT&T. We also found that SMEs provided feedback to the CORs relating to the adequacy of the deliverable reports. Without proper designation, training, and certification, the risk of inappropriate contract actions increases.

Recommendation

We recommend that the Assistant Secretary of Commerce for Communications and Information and NTIA Administrator direct FirstNet Authority’s Chief Executive Officer and Chief Procurement Officer to do the following:

4. Ensure that any personnel conducting surveillance activities on the NPSBN are appointed, in writing, and complete any necessary training and certifications as required by the *CAM* and/or the *FAR*.

IV. FirstNet Authority’s SMC Reviews Were Not Conducted in a Transparent Manner for the NPSBN Reinvestment TOs

We found that FirstNet Authority’s SMC reviews for the first two reinvestment TOs were not conducted in a transparent manner to allow for an independent oversight body to attest to the adequacy of the oversight provided by the SMC. The SMC is comprised of high-level FirstNet Authority management³⁸ responsible for implementing and evaluating the internal control system to ensure that the entity’s objectives are met.³⁹ The *FirstNet Authority Investment Procedures* state that “[t]he SMC is responsible for the review, analysis, recommendation, and oversight of all investment opportunities.”⁴⁰ During the investment execution phase, the SMC is responsible for reviewing each investment quarterly to evaluate investment progress, performance, risk, and changes to the investments. FirstNet

³⁷ *CAM* 1301.670 § 3.2 (August 2020).

³⁸ The SMC consists of individuals that report to FirstNet Authority’s Executive Director, such as the Chief Counsel, Chief Procurement Officer, and Chief Network and Technology Officer, among others.

³⁹ U.S. Government Accountability Office, September 10, 2014. *Standards for Internal Control in the Federal Government*, GAO-14-704G. Washington, DC: GAO, § OVI.06, pg. 6. Available online at <https://www.gao.gov/products/gao-14-704g> (accessed May 10, 2022).

⁴⁰ FirstNet Authority, March 30, 2021. *FirstNet Authority Investment Procedures*, FNPS 900-I. Reston, VA: FirstNet Authority.

Authority's *SMC Policy*⁴¹ states that meeting minutes will be kept to communicate SMC decisions and action items. This policy is consistent with the U.S. Government Accountability Office's *Standards for Internal Control in the Federal Government*, which requires that "[m]anagement clearly documents internal control and all transactions and other significant events in a manner that allows the documentation to be readily available for examination."⁴²

Early in the audit and in an attempt to verify FirstNet Authority's oversight of investments, we requested access to (1) Program Management Review and (2) Opportunity Review Forum (ORF)—now known as the SMC⁴³—meetings or recordings of meetings, but FirstNet Authority denied our request to observe the meetings, which resulted in a lack of transparency to us as the independent oversight body. FirstNet Authority stated that our presence at meetings would stifle conversations "necessary for FirstNet to fulfill its mission." Without having access to these meetings, we had limited insight into the business aspects of the NPSBN program.

As an alternative to meeting attendance, FirstNet Authority provided Program Management Review and ORF/SMC meeting minutes. However, most did not provide enough evidence to determine the sufficiency of SMC oversight of its first two reinvestments. We reviewed SMC meeting minutes from July 2020 to September 2021 and found that these meeting minutes (1) lacked details on important discussions and associated actions, and (2) did not provide the full context of decisions and actions we would have expected to occur during these meetings. For example, we reviewed NPSBN contract modifications and found that FirstNet Authority made five changes to the 5G Upgrade contract line item number delivery dates (two accelerated dates and three delays); however, SMC meeting minutes did not include information regarding delivery delays or the SMC's decision to move forward with the contract modification to codify all delivery changes. Instead, SMC meeting minutes were limited to a few sentences and only included the overall categories reported in the SMC presentations. We asked FirstNet Authority for additional documentation to support the SMC discussion, but it was unable to provide additional documentation. As such, we were unable to determine if the SMC provided sufficient oversight over these first two reinvestments.

Restricting our attendance, coupled with the lack of adequate meeting minutes and action items, significantly limits our understanding of actions needed and taken to support and justify important public safety network investment decisions for the NPSBN. The significance of the network to public safety officials and substantial funds to be available for reinvestment necessitate that SMC decisions be sound, supported, and sufficiently documented.

In accordance with the Inspector General Act of 1978, the Inspector General is authorized to request such assistance as may be necessary for carrying out the duties and

⁴¹ FirstNet Authority, March 11, 2021. *Senior Management Council*, FNP 404. Reston, VA: FirstNet Authority.

⁴² GAO *Standards for Internal Control*, pg. 48.

⁴³ Prior to March 2021, the ORF was responsible for investment oversight. FirstNet Authority assigned that duty to the SMC during an organizational structure change.

responsibilities of the Act.⁴⁴ We believe that conducting key business meetings while restricting the access of independent oversight personnel reduces the NSPBN program's transparency. Independent oversight is important to ensure that decisions are understood, since approximately \$15 billion is expected to be used for reinvestments to maintain and improve the NSBPN network.

Recommendations

We recommend that the Assistant Secretary of Commerce for Communications and Information and NTIA Administrator direct FirstNet Authority's Chief Executive Officer to do the following:

5. Ensure that SMC meetings are conducted in a transparent manner by allowing our attendance or providing an alternative that clearly and comprehensively demonstrates FirstNet Authority's oversight.
6. Ensure management discussions and decisions are fully documented with sufficient detail to (a) support adequate investment oversight and (b) justify key decision approvals.

Conclusion

The Act statutorily charged FirstNet Authority with overseeing the contract to build, operate, and maintain the NPSBN, which should evolve with technology.⁴⁵ The NPSBN was built specifically to meet the needs of the public safety community, and it is vital to national interest that FirstNet Authority ensures the contractor delivers a suitable NPSBN.

FirstNet Authority has missed opportunities to fully assess AT&T performance and hold it accountable for contract performance. As a result, FirstNet Authority has less assurance that NPSBN goals are being met, and it cannot effectively ensure that the contractor is meeting contractual terms or the needs of its public safety community customers. Until FirstNet Authority takes action to put in place monitoring plans and appropriate performance measures for the TOs, it will continue to put the NPSBN program—and the billions of dollars that fund it—at risk of not achieving intended results.

⁴⁴ IG Act § 6, recodified at 5 U.S.C. § 406.

⁴⁵ Pub. L. No. 112-96, § 6206(b)(1)(D) and § 6202(b).

Summary of Agency Response and OIG Comments

On January 20, 2023, we received NTIA's response to our draft report. In response to our draft report, NTIA concurred with all recommendations. NTIA's formal response included a comment letter from FirstNet Authority. We reviewed FirstNet Authority's comment letter and determined that it does not warrant altering our findings and recommendations. At the request of FirstNet Authority, we have placed redactions in this report and memorandum to cover sensitive information about AT&T's trade secrets. NTIA's formal response and FirstNet Authority's comment letter are included within this final report as appendix B.

Appendix A: Objective, Scope, and Methodology

Our objective was to determine whether FirstNet Authority’s process for reinvesting fee payments is effective and consistent with established practices, procedures, and regulations. We separated this audit objective into different components that include (1) the price reasonableness of the investments,⁴⁶ (2) identifying investments and developing business cases,⁴⁷ and (3) oversight of the investments following implementation. This report focuses on the third component—FirstNet Authority’s oversight of the investments following implementation.

To accomplish our objective, we did the following:

- Reviewed the following policies, practices, procedures, and guidance:
 - *Middle Class Tax Relief and Job Creation Act of 2012*, Public Law 112-96
 - NPSBN contract terms and conditions
 - FAR § 1.602-2, *Responsibilities*
 - FAR Part 4, *Administrative and Information Matters*
 - FAR Part 37, *Service Contracting*
 - FAR Part 46, *Quality Assurance*
 - CAM 1301.670, *Contracting Officer Representative Certification Program*
 - GAO-14-704G, *Standards for Internal Control in the Federal Government*
 - *FirstNet Acquisition Manual V.8*, October 6, 2020
 - FirstNet Authority Policy 404, *Senior Management Council*
 - FirstNet Authority Policy 900, *Investment Procedures Policy*
 - *FirstNet Authority Investment Procedures*, versions 5, 6, and 6.1
 - FirstNet Authority’s NPSBN Contract Processes
 - *NPSBN Deliverable Management Processes*, versions 0.4 and 0.6
 - *NPSBN QASP Management Processes*, version 0.4
 - *NPSBN RTM Management Process*, version 0.5
 - FirstNet Authority’s *Receipt, Inspection, Acceptance, and Invoice Processing*
 - NPSBN TO I-4, *Invoice Management Process*, version 0.1⁴⁸

⁴⁶ DOC OIG, August 25, 2022. *FirstNet Authority Did Not Have Reliable Cost Estimates to Ensure It Awarded Two Reinvestment Task Orders at Fair and Reasonable Prices*, OIG-22-029-A. Washington, DC: DOC OIG.

⁴⁷ DOC OIG, November 28, 2022. *FirstNet Authority Could Not Demonstrate Investment Decisions Were the Best Use of Reinvestment Funds or Maximized the Benefit to Public Safety*, OIG-23-005-A. Washington, DC: DOC OIG.

⁴⁸ FirstNet Authority used NPSBN TO I-4 *Invoice Management Process* for all TO invoices despite the “TO I-4” in the process title.

- Selected nonstatistical samples⁴⁹ that included documents from June 2020 (beginning of the TO execution phase) through September 2021
- Obtained and reviewed FirstNet Authority documentation that supported the verification, validation, and acceptance of contract line-item numbers, deliverables, and QASP items included in our samples
- Interviewed FirstNet Authority officials identified as responsible for contract oversight of investments
- Interviewed first responder personnel who provided feedback on dedicated deployables

We gained an understanding of the internal controls significant within the context of the audit objective by (1) interviewing FirstNet Authority and Department personnel and (2) reviewing policies and procedures. In satisfying our audit objectives, we did not rely on computer-processed data. Instead, we reviewed documentation submitted by FirstNet Authority; therefore, we did not test reliability of FirstNet Authority's information technology systems. We identified weaknesses in internal controls related to oversight as noted in the "Objective, Findings, and Recommendations" section of this report.

We conducted our review from September 2020 through April 2022 under the authority of the Inspector General Act of 1978, as amended (recodified at 5 U.S.C. § 401 et seq.), and Department Organization Order 10-13, dated October 21, 2020. We performed our fieldwork remotely.

We conducted this performance audit in accordance with generally accepted government auditing standards. These standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objective. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective.

⁴⁹ Due to the limited size of the universe, we did not use a statistical sample or project results.

Appendix B: Agency Response



UNITED STATES DEPARTMENT OF COMMERCE
National Telecommunications and
Information Administration
Washington, D.C. 20230

January 20, 2023

TO: Arthur L. Scott Jr.
Assistant Inspector General for Audit and Evaluation

FROM: Alan Davidson Alan B. Davidson
Assistant Secretary of Commerce for Communications and Information and NTIA Administrator

SUBJECT: Response for Audit Report entitled *FirstNet Authority Failed to Provide Adequate Contract Oversight for Its Initial Two Reinvestment Task Orders*

Digitally signed by Alan B. Davidson
Date: 2023.01.20 14:58:06 -05'00'

This memorandum contains the response from the National Telecommunications and Information Administration (NTIA) and the First Responder Network Authority (FirstNet Authority) to the Office of the Inspector General (OIG) report entitled *FirstNet Authority Failed to Provide Adequate Contract Oversight for Its Initial Two Reinvestment Task Orders*.

- OIG recommends that the Assistant Secretary of Commerce for Communications and Information and NTIA Administrator should direct the FirstNet Authority Chief Executive Officer and Chief Procurement Officer to:
1. Modify the current QASP to ensure that NPSBN contract QASP items, for TOs 6 and 7, are complete and sufficiently detailed to measure the contractor's performance regarding the quality of NPSBN services expected to be provided for the respective TOs. (Concur)
 2. Ensure the QASP is adequately updated for future reinvestment TOs and QASP items are complete and sufficiently detailed to measure the contractor's performance regarding the quality of NPSBN services expected to be provided for the TOs. (Concur)

NTIA and the FirstNet Authority accept the OIG recommendations and the FirstNet Authority will work to modify the QASP to comply with the OIG recommendations and to ensure that it remains updated for future reinvestment task orders.

3. Strengthen FirstNet Authority's contract monitoring activities including conducting onsite surveillance activities and verify services are provided. (Concur)

We accept the OIG recommendation to strengthen contract monitoring activities. The FirstNet Authority will develop a plan to implement this recommendation.

4. Ensure that any personnel conducting surveillance activities on the NPSBN are appointed, in writing, and complete any necessary training and certifications as required by the CAM and/or the FAR. (Concur)

We accept the OIG recommendation and will continue to ensure proper appointment, training and certification of personnel fulfilling these roles and conducting these activities per the CAM and/or the FAR.

➤ OIG recommends that the Assistant Secretary of Commerce for Communications and Information and NTIA Administrator direct FirstNet Authority's Chief Executive Officer to do the following:

5. Ensure that SMC meetings are conducted in a transparent manner by allowing our attendance or providing an alternative that clearly and comprehensively demonstrates FirstNet Authority's oversight. (Concur)

We accept the OIG recommendation to ensure that SMC meetings are conducted in a transparent manner. However, NTIA and the FirstNet Authority do not believe OIG attendance at SMC meetings is warranted. Therefore, the FirstNet Authority will work on developing an alternative that clearly and comprehensively demonstrates FirstNet Authority's oversight of contract task orders.

6. Ensure management discussions and decisions are fully documented with sufficient detail to (a) support adequate investment oversight and (b) justify key decision approvals. (Concur)

We accept the OIG recommendation to ensure the FirstNet Authority fully documents, with sufficient detail, management discussions and decisions.

NTIA appreciates the OIG team's work on this audit, and we thank you for considering these comments. We look forward to working with you as we continue to address the recommendations in this report. Should you have questions, please contact Josephine Arnold, NTIA Audit Liaison at jarnold@ntia.gov.

Addendum: FirstNet Authority Response



MEMORANDUM FOR: Arthur Scott
Assistant Inspector General for Audit and Evaluation

FROM: Lisa Casias
Acting Executive Director

DATE: January 20, 2023

SUBJECT: Response of the First Responder Network Authority

Lisa Casias
Digitally signed by Lisa Casias
Date: 2023.01.20 15:12:51 -0500'

The FirstNet program is a public-private partnership whose statutory mission is to establish the nationwide public safety broadband network (NPSBN).¹ The NPSBN is operational with over 4 million device connections, serving more than 23,000 public safety agencies and organizations, and covering 99 percent of the population. In addition to its program oversight responsibilities,² the FirstNet Authority is required to improve the NPSBN, which it does by making network investments.³

The focus of the OIG report is at the nexus of these two responsibilities in that it reviews the FirstNet Authority's oversight of the implementation of network investments made in 2020. These network investments related to initial upgrades to the NPSBN Core network to permit access to AT&T's 5G services by NPSBN public safety users and to increase the number of deployable network assets capable of providing NPSBN service coverage in areas where coverage is non-existent, has been interrupted, or requires additional capacity or redundancy. Both investments have expanded access to reliable wireless broadband for America's first responders when and where they need it most, including in rural and remote areas and tribal communities.

Recently, Hurricane Ian provided a real-world example of why investments in the NPSBN are important to public safety users and the nation. In the immediate aftermath of the storm, AT&T moved FirstNet dedicated deployables into the area to provide connectivity for recovery efforts. Specifically, FirstNet compact rapid deployables (CRDs) were made available and were operational within minutes to support first responders. Cut-off from the mainland, FirstNet CRDs were delivered to Sanibel Island by an AT&T amphibious vehicle and to Pine Island by helicopter. The FirstNet deployables also permitted those in need to access 911 emergency calling.

A benefit of the public-private arrangement mandated by the FirstNet Authority enabling statute is that the federal government and a private entity use their collective resources and expertise to support the public good. This benefit of the FirstNet program was on display responding to

¹ See 47 U.S.C. § 1422(a) and 1428(a)(2)(B). Providing resources and expertise, the private entity building and operating the NPSBN is AT&T.

² See 47 U.S.C. § 1426(b)(1)(D).

³ See 47 U.S.C. § 1428(d).

Hurricane Ian and is on display each day as FirstNet helps public safety make the lives of everyone in the nation safer and more secure.

It is the FirstNet Authority's goal to continually improve the NPSBN by making network investments as envisioned by Congress and to carefully oversee those investments through the efforts of the FirstNet Authority Office of the Chief Procurement Officer. Regarding the findings related to the OIG Recommendation #4, we agree with the OIG recommendation and will continue to ensure proper appointment, training and certification of personnel as required by the CAM and/or the FAR. After review and conferring with the Department's Office of Acquisition Management (OAM), however, we note that there are no specific requirements or practice under the Federal Acquisition Regulation, the FirstNet Enabling Act, the Commerce Acquisition Manual (CAM), or the FirstNet Acquisition Manual (FAM) relating to appointment of FirstNet Authority subject matter experts involved in supporting the Contracting Officer Representatives (CORs) in NPSBN Contract oversight. Additionally, the NPSBN CORs do not redelegate their Contracting Officer delegated duties to internal FirstNet Authority program managers, but rather rely on them for their subject matter and technical expertise.

As an organization the FirstNet Authority always strives to improve our processes and will work to implement the OIG's recommendations as we continue to make network investments for our nation's first responders.

Please feel free to contact me at Lisa.Casias@FirstNet.gov if you have any questions.

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