Thank you for the opportunity to comment.

This comment addresses a valuable national standard for spatial interoperability known as the U.S. National Grid. The U.S. National Grid (USNG) standard (FGDC-STD-011-2001) was adopted on 13 Dec 2001 by the Federal Geographic Data Committee as part of the National Spatial Data Infrastructure (NSDI). Its objective is to "...increase the interoperability of location services appliances with printed map products by establishing a nationally consistent grid reference system as the preferred grid for NSDI applications."

I note that one of the key topics of interest for the Sub-Committee is "Emergency Communications Interoperability." With respect, I recommend you expand that topic to reflect "Emergency Response Interoperability" to capture not only communications, but also the geospatial awareness component of emergencies. While communications interoperability is important as has been recognized for years, equally important to the response equation is spatial interoperability, to enable responders to reach incident locations with minimal confusion about where they actually are. Street addresses and signs are not useful in devastated or rural areas and in situations where responders are from other jurisdictions. GPS is also not a panacea, since it will report locations in any of a dozen or more conventions.

Unfortunately, adoption does not equate to use, and even though the USNG was adopted nearly 10 years ago, its implementation by the Federal civil agencies has been sporadic. Its value was acknowledged by the Director of FEMA nearly two years ago, and it is used by FEMA Urban Search and Rescue teams; however, it has not been implemented elsewhere in FEMA and DHS, or in other Federal organizations responsible for emergency response. Most importantly, it has not been included in most emergency planning doctrine and training between the Federal Government and States and localities, where its application would be most useful and life-saving.

The essence of this rationale is captured in the attached excerpt from a Defense Science Board report issued in October 2005 on the Future of the Global Positioning System. Since that time, the Defense Department has updated its warfighting doctrine in a Chairman of the Joint Chiefs Instruction (CJCSI 3900-01C) and Joint Publication (Joint Pub 2-03, Geospatial Intelligence Support to Joint Operations) to reflect the importance of spatial interoperability to operations of all kinds. (Excerpt follows, "Ground forces will use and be serviced with the Military Grid Reference System and mean sea level (MSL) supported in the WGS-84 position reference system (datum). To support homeland security and homeland defense, the Federal Geographic Data Committee (FGDC) US National Grid (USNG) standard when referenced to North American Datum 1983 (NAD83) is operationally equivalent to and is an accepted substitute for MGRS coordinates referenced to WGS 84.") This language specifically recognizes the critical importance of spatial interoperability as well as the important linkage between these equivalent military and civil coordinate systems in joint emergency response situations.

The Defense Department has recommended to DHS on several occasions that, to ensure interoperability with military units in joint emergency response situations, DHS incorporate use of the USNG into its emergency response

doctrine and training programs and in its outreach to States and localities. However, despite the one positive sign from the FEMA Director, there has been no appreciable follow-up from FEMA, DHS, or elsewhere within the civil agencies.

Thank you, and I would be happy to discuss in more detail at any time.

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