

AGENDA

LOS ANGELES REGIONAL INTEROPERABLE COMMUNICATIONS SYSTEM AUTHORITY

JOINT OPERATIONS AND TECHNICAL COMMITTEE MEETING

Tuesday, January 19, 2021 • 1:30 p.m. **Teleconference/WebEx Meeting*** Meeting Call-in Number for Committee Members and Public:

Telephone Number: (213) 306-3065 / Access Code: 146 059 6567

Los Angeles Regional Interoperable Communications System Authority (the "Authority")

AGENDA POSTED: January 14, 2021

Complete agendas are made available on the Authority's website at <u>http://www.la-rics.org</u>. *The procedures used for this Teleconference/WebEx Meeting is permitted pursuant to Executive Order N-29-20 issued on March 17, 2020, by the Governor of the State of California.

OPERATIONS COMMITTEE Members:

- 1. John Geiger, Los Angeles County, CEO
- 2. Steve Cabrera, Vice-Chair, County of Los Angeles Fire Dept.
- 3. Sven Crongeyer, Chair, L.A. County Sheriff's Dept.
- 4. Cathy Chidester, Los Angeles County DHS
- 5. Chris Donovan, Los Angeles Area Fire Chiefs Association
- 6. Anthony Vairo, L.A. County Police Chiefs Association
- 7. Vacant, CA Contract Cities Assoc.
- 8. Jeff LaGreek, Inglewood Police Dept.
- 9. Vacant, Signal Hill Police Dept.
- 10. John Curley, Covina Police Dept.

Alternates:

Mike Iwanaga, Los Angeles County, CEO Tony Ramirez, County of Los Angeles Fire Dept. Vacant, L.A. County Sheriff's Dept. Kay Fruhwirth, Los Angeles County DHS Eric Zanteson, Los Angeles Area Fire Chiefs Association Shelly Vander Veen, L.A. County Police Chiefs Association Vacant, CA Contract Cities Assoc. Paul Devlin, Inglewood Police Dept. Vacant, Signal Hill Police Dept. Ric Walczak, Covina Police Dept.

TECHNICAL COMMITTEE Members:

- 1. John Geiger, Los Angeles County, CEO
- 2. Scott England, Vice-Chair, County of Los Angeles Fire Dept.
- 3. Sven Crongeyer, Los Angeles County Sheriff's Dept.
- 4. Lipin Tan, Los Angeles County DHS
- 5. James Craig, Manhattan Beach Fire Dept.
- 6. Ted Pao, Chair, Los Angeles County Internal Services Dept.
- 7. Vacant, CA Contract Cities Assoc.
- 8. Jeff LaGreek, Inglewood Police Dept.
- 9. Vacant, Signal Hill Police Dept.
- 10. John Curley, Covina Police Dept.

Alternates:

Mike Iwanaga, Los Angeles County, CEO Hugo Ballesteros, County of Los Angeles Fire Dept. Vacant, Los Angeles County Sheriff's Dept. Kim Buard, Los Angeles County DHS Eric Zanteson, Los Angeles Area Fire Chiefs Association Nancy Yang, Los Angeles County Internal Services Dept. Vacant, CA Contract Cities Assoc. Paul Devlin, Inglewood Police Dept. Vacant, Signal Hill Police Dept. Ric Walczak, Covina Police Dept.



NOTE: ACTION MAY BE TAKEN ON ANY ITEM IDENTIFIED ON THE AGENDA

- I. CALL TO ORDER
- II. ANNOUNCE QUORUM Roll Call
- III. APPROVAL OF MINUTES (A)
 - A. November 17, 2020 Regular Meeting Minutes
- IV. PUBLIC COMMENTS
- V. CONSENT CALENDAR NONE
- VI. REPORTS (B-D)
 - **B.** PSBN Round 2 Deployment Update Chris Odenthal

Agenda Item B

C. LMR Update – Justin Delfino

Agenda Item C

D. Regional ISSI Interoperability Working Group – No Update

VII. DISCUSSION ITEMS (E-F)

- E. Distribution of the LARTCS/ACVRS Channel Plan Ted Pao
 Agenda Item E
- F. Department of Justice Bulletin 20-09-Criminal Justice Information Services (CJIS) Sven Crongeyer

Agenda Item F

VIII. ADMINISTRATIVE MATTER – NONE

IX. MISCELLANEOUS – NONE



X. ITEMS FOR FUTURE DISCUSSION AND/OR ACTION BY THE COMMITTEE

XI. CLOSED SESSION REPORT – NONE

XII. ADJOURNMENT AND NEXT MEETING:

Tuesday, March 16, 2021, at 1:30 p.m., via Teleconference/WebEx Meeting.



COMMITTEE MEETING INFORMATION

In accordance with Executive Order No. 25-20 on March 17, 2020, by the Governor of the State of California, this Meeting can be conducted via Teleconference/WebEx. Members of the public are invited to participate in the Teleconference/WebEx meeting via the phone number provided above, and address the LA-RICS Committee on any item on the agenda prior to action by the Committee on that specific item. Members of the public may also address the Committee on any matter within the subject matter jurisdiction of the Committee. The Committee will entertain such comments during the Public Comment period. Public Comment will be limited to three (3) minutes per individual for each item addressed, unless there are more than ten (10) requests for each item, in which case the Public Comment will be limited to one (1) minute per individual. The aforementioned limitation may be waived by the Committee's Chair.

(NOTE: Pursuant to Government Code Section 54954.3(b) the legislative body of a local agency may adopt reasonable regulations, including, but not limited to, regulations limiting the total amount of time allocated for public testimony on particular issues and for each individual speaker.)

It is requested that individuals who require the services of a translator contact the Committee Secretary no later than the day preceding the meeting. Whenever possible, a translator will be provided. Sign language interpreters, assistive listening devices, or other auxiliary aids and/or services may be provided upon request. To ensure availability, you are advised to make your request <u>as soon as possible</u>. (323) 881-8291 or (323) 881-8295

SI REQUIERE SERVICIOS DE TRADUCCION, FAVOR DE NOTIFICAR LA OFICINA LO MAS PRONTO POSIBLE.

The meeting is recorded, and the recording is kept for 30 days.



JOINT OPERATIONS AND TECHNICAL COMMITTEE MEETING MINUTES

LOS ANGELES REGIONAL INTEROPERABLE COMMUNICATIONS SYSTEM AUTHORITY

> Tuesday, November 17, 2020 • 1:30 p.m. Teleconference/Webex Meeting*

Operations Committee Members Present:

John Geiger, Los Angeles County, CEO Steve Cabrera, Vice-Chair, County of Los Angeles, Fire Department Sven Crongeyer, Chair, Lieutenant, Los Angeles Sheriff's Department Cathy Chidester, Los Angeles County DHS Jeff LaGreek, Sergeant, Inglewood Police Department Ric Walczak, Lieutenant, Covina Police Department

Technical Committee Members Present:

John Geiger, Los Angeles County, CEO Scott England, Vice-Chair, Telecommunications Systems Consulting Engineer, LACoFD Sven Crongeyer, Lieutenant, Los Angeles Sheriff's Department Lipin Tan, Los Angeles County DHS Ted Pao, Chair, Information Technology Specialist, Los Angeles County Internal Services Department Jeff LaGreek, Sergeant, Inglewood Police Department Ric Walczak, Lieutenant, Covina Police Department

Absent:

Chris Donovan, Fire Chief, Los Angeles Area Fire Chiefs Association **Anthony Vairo**, Los Angeles County, Police Chiefs Association **James Craig**, Manhattan Beach Fire Department

Officers Present: Joann Huerta, LA-RICS Committee Secretary

November 17, 2020

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NOTE: ACTION MAY BE TAKEN ON ANY ITEM IDENTIFIED ON THE AGENDA

I. CALL TO ORDER

Operations Committee Chair Sven Crongeyer called the meeting to order at 1:31 p.m.

II. ANNOUNCE QUORUM – Roll Call

Operations Committee Chair Crongeyer asked for a roll call and acknowledged a quorum was present for Joint Operations and Technical Committee (Joint Committees).

III. APPROVAL OF MINUTES (A)

A. September 15, 2020 – Regular Meeting Minutes

Operations Technical Chair Pao asked for a motion to approve the minutes.

Operations Committee Vice-Chair Steve Cabrera motioned first, seconded by Technical Committee Vice-Chair Scott England.

Ayes 9: Cabrera, Chidester, Crongeyer, England, Geiger, LaGreek, Pao, Tan, and Walczak.

MOTION APPROVED.

- IV. PUBLIC COMMENTS (NONE)
- V. CONSENT CALENDAR (NONE)
- VI. REPORTS (B-E)
 - **B.** Status Report Update for LTE Rick Burke

Televate Consultant Rick Burke provided an update on the Long Term Evolution (LTE) Public Safety Broadband Network (PSBN) Round 1 project and stated as of November 12, 2020, AT&T FirstNet is transitioning seventy-three (73) LTE sites into the network, with sixty-three (63) sites currently integrated into the AT&T network and ten (10) sites remaining to be integrated.

All but one of the remaining sites are forecasted to be integrated by the end of the first quarter of 2021, with one site being integrated during the second quarter of 2021.

There was no further discussion.

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C. Status Report Update for PSBN Round 2 Deployment – Program Manager Justin Delfino

Program Manager Justin Delfino provided an update on the deployment of LTE Round 2 and stated the Magic Mountain Link (MML) is on track for final completion and the Montebello Police Department (MNTBLPD) site was completed at the end of October 2020.

The Port of Los Angeles (POLA1) had a slight issue with one tower appurtenance a (clam shell) and we are working on getting that resolved by ordering the new piece for installation. The Port of Los Angeles (POLA2) had a significant scope change; in that the power run to Fenix Terminal's house circuit no requires action by the LA-RICS contractor to make the termination at the building, over 900 feet away. The Authority is currently working to schedule this work with Fenix Terminal operations department representatives.

The Port of Long Beach (POLB1) site hasn't started yet; rates to be agreeable between AT&T and Long Beach are under active discussion. We can't start the site until these issues are resolved.

Pomona 2 (POM2) is moving along after a month long investigation regarding the hazardous material issue, the Judicial Council of California (JCC) needs confirmation there is not hazardous material and abatement work needed in order to proceed forward. Once its confirmed with JCC consultant, the Team are free to move forward.

There was no further discussion.

D. Status Report Update for LMR – Program Manager Justin Delfino

Program Manager Justin Delfino provided an update on the LMR system and provided detailed information on which sites are in construction, along with additional details supporting the construction-related activities occurring at the sites to date.

Program Manager Justin Delfino stated the completion is in the high 84-85% of the program. Site Access Agreement (SAA) is nearly all completed at this time but for Dakin Peak (DPK), which is the last one that requires completion on Catalina Island. The other site requiring finalization for SAA is East Sunset Ridge (ESR). The open issue pertains to the Owner's desire to migrate additional equipment onto the tower which will be structurally retrofitted by LA-RICS. A recent major victory was with Catalina Island sites finalizing their SAA for Black Jack Peak (BJM) and Tower Peak (TWR).

In regards to construction, approval was received to re-start build at the United States Forest Service (USFS) sites post long shut down due to wild fires. All UASI 18 grant

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November 17, 2020



spending is on track to closeout on time. Work at Frost Peak (FRP) and Mountain High Ski Resort was suspended to allow for the resort ski season and the access road will re-open at the close of ski season anticipating end of April 2021, currently.

In regards to Narrow-banding, a deep dive on the schedule was performed along with MSI to continue and progress efforts to properly sequence the work in such a way that the critical date of October 30, 2020, is less impactful to the Program overall. One suggestion is to modify the Phase 4b testing plans to allow sites that do not rely on narrow-banding completion to be performed first and allow more time for just in time migration.

Lastly, Program Manager Delfino stated Phase 4 work such as site Optimization and microwave alignment is currently underway at several sites. Narrow-banding is underway for Channel 16, with Technical Lead Engineer Pao aiding in coordination with Los Angeles Sheriff's Department (LASD).

In regards to the United States Forest Service (USFS) sites, construction was severely impacted by fires in the months of September, October and November 2020; not only was the contractor forced to vacate active construction projects, it also delayed the start of Sites ESR, MTL2 and BUR1.

There was no further discussion.

E. Regional ISSI Interoperability Working Group – No Update

VII. DISCUSSION ITEMS (F-H)

F. Distribution of the LARTCS/ACVRS Channel Plan – Sven Crongeyer

Operations Committee Chair Crongeyer provided an update and stated the distribution of the LARTCS/ACVRS Channel Plan is underway and will allow members and SoCal agencies time to insert the new frequencies into their radio code plugs.

Operations Committee Chair Crongeyer presented a draft Memorandum of Understanding (MOU) for Use of LA-RICS User Equipment between the Los Angeles County Sheriff's Department (LASD) and the Los Angeles County Fire Department (LACoFD) and explained how LA-RICS is going to manage the thirteen (13) channels and states that only one (1) channel is countywide and designated to the County Fire Department and someone will need to manage these channels and how they will be used.

Further discussion will be forthcoming at the next Committee meeting.

Committee Member John Geiger asked who handles the LARTCS/ACVRS Channel Plan? Operations Chair Crongeyer responded Technical Committee Chair Pao



handles the meeting agenda and works with Los Angeles City. Committee Member Geiger stated that the County Internal Services Department (ISD) needs to be included in these meeting work groups. Technical Committee Chair Pao stated ISD has been invited to the meetings.

There was no further discussion.

G. Regional Interoperability Working Group Status – Ted Pao

Technical Committee Chair Pao stated the Regional Interoperability Working Group Status meeting scheduled for October 2020, was canceled and will reconvene this month or in December 2020.

There was no further discussion.

H. Regional Cyber Security Grant Request for UASI'21 – Ted Pao

Technical Committee Chair Pao provided an overview and status update on the Regional Cyber Security Grant Request for UASI 21 and stated most of you realize the trunked radio network, like LA-RICS, is largely an IP network that is vulnerable to cyber-attacks like our home computers and enterprise networks. The radio networks are using common network hardware platforms with standard operating systems, which are also potentially vulnerable to these malicious entities.

Technical Committee Chair Pao went on to state for UASI 21, LA-RICS has submitted an application for cybersecurity contractor that are familiar with radio networks to provide reports and recommendation to fortify out LMR networks for the region.

There was no further discussion.

VIII. ADMINISTRATIVE MATTERS – (I)

I. 2021 SCHEDULE OF LA-RICS JOINT OPERATIONS AND TECHNICAL COMMITTEE MEETING

Operations Committee Chair Crongeyer presented the 2021 Schedule of LA-RICS Joint Operations and Technical Committee Meetings and recommended that your Committee:

Approve the following dates for the calendar year 2021 Joint Operations and Technical Committee Regular Meeting Schedule:

January 19 March 16

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July 20 September 21 November 16

All regular Meetings will be held at 1;30 p.m. Pacific Time via Teleconference/WebEx until further notice.

Joint Committee Member John Geiger motioned first, seconded by Operations Committee Vice-Chair Steve Cabrera.

Ayes 9: Cabrera, Chidester, Crongeyer, England, Geiger, LaGreek, Pao, Tan, and Walczak.

MOTION APPROVED

IX. MISCELLANEOUS – NONE

X. ITEMS FOR FUTURE DISCUSSION AND/OR ACTION BY THE COMMITTEE

Operations Committee Chair Crongeyer stated a future topic of discussion will be made on Encryption of radios at our next Joint Committee meeting and the California Department of Justice (DOJ) Information Bulletin will be provided at our next Committee meeting to discuss LA-RICS plans for encryption and how agencies can operate their radios in encrypted mode if they choose to do so.

Operations Committee Chair Crongeyer also stated the Department of Justice (DOJ) is very strict when it comes to speaking over the radio and stating name, address, driver license, and recommends this should be secured and protected and encrypted. LA-RICS radios are already encrypted and will send out a list of those radios that can be encrypted.

XI. CLOSED SESSION REPORT – NONE

XII. ADJOURNMENT AND NEXT MEETING:

The Operations and Technical Committee Meeting adjourned at 1:51 p.m., and the next Committee Meeting is scheduled to be held on Tuesday, January 19, 2021, at 1:30 p.m., via Teleconference/WebEx.

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2525 Corporate Place, Suite 100 Monterey Park, California 91754 Telephone: (323) 881-8291 http://www.la-rics.org

SCOTT EDSON EXECUTIVE DIRECTOR

January 19, 2021

To: LA-RICS Joint Operations and Technical Committee Members

From: Scott Edson Scott Data Executive Director

PSBN ROUND 2 DEPLOYMENT UPDATE

The purpose of this discussion item is to provide an update on the Public Safety Broadband Network (PSBN) Round 2 deployment.

CO:jh

Attachment

LA-RICS PSBN SITE DEPLOYMENT Week of 01/11/2021

Site ID	Туре	GC	Power	City Planning	MISC Permit HDP /CP	Building Permit Rec'd	SAA Exec	Site Construction	Tower Delivered	Tower Construction	Lines & Antennas	Equipment Installation	Site Construction	Close Out	
				8				Start		Complete	Complete	Complete	Finish		
MML2	Colo	MSI	Complete	NA	NA	5/21/2020	Complete	7/31/2020	NA	11/20/2020	11/27/2020	11/30/2020	11/30/2020	1 1 -	Substantially Complete. Ground I Awaiting MSI Forecast.
MNTBLPD	Pole	Diversifie	Complete	NA	NA	9/11/2020	Complete	9/28/2020	8/21/2020	10/16/2020	11/27/2020	11/30/2020	11/30/2020	1/30/2021	Substantially Complete. GC to con removal on existing tower. No To necessary.
POLA1	Best	Jitney	Complete	7/30/2020	CP = Approved HEP = Approved		Complete	8/10/2020	8/29/2020	8/29/2020	1/18/2021	10/6/2020	1/22/2021	2/12/2021	LADWP, Power install May 2021
POLA2	Best	Jitney	Fenix	7/30/2020	CP = Approved HEP = Approved		Complete	8/10/2020	8/29/2020	8/29/2020	10/6/2020	10/6/2020	1/22/2021	2/12/2021	Site is Substanially Complete. Pow Conduit installation Run thru Feni 1/12/2021.Power Conductors insta
POLB1	Pole	Motive	Submeter - Design	8/20/2020	Complete	9/18/2020	Pending - See Comments	•	Pending - See Comments	J	LA-RICS assisting with outreach a awaiting AT&T Lease negotation				
POM2	Roof	Motive	Complete	NA	NA	12/23/2020	Complete	2/1/2021	NA	NA	3/15/2021	3/22/2021	3/29/2021	4/19/2021	JCC Cancelled Crane work on 1/2

Le	egend
	Completed
	Forecasted - Schedul
	Delayed Timeline

Tower Type	Qty
Colo	1
Pine	4
Roof	1

Comments

nd Ring not complete as it is tied to LMR.

o complete Roll Up Door Installation and MW o Tower Decom or relocation of equipment is

2021.

Power Conduit and additional AT&T FIber Fenix Terminal access road completed installation scheduled 1/18/2021.

ach regarding \$10k monthly rent figure. CX tion and approval to move forward.

1/23/20201, rescheduled CX Start 2/1/2021.

AGENDA ITEM B - ATTACHMENT



2525 Corporate Place, Suite 100 Monterey Park, California 91754 Telephone: (323) 881-8291 http://www.la-rics.org

SCOTT EDSON EXECUTIVE DIRECTOR

January 19, 2021

To: LA-RICS Joint Operations and Technical Committee Members

From: Scott Edson Scott Day Executive Director

LAND MOBILE RADIO (LMR) UPDATE

The purpose of this discussion item is to provide an update on the Land Mobile Radio (LMR) System:

- Permits issued to date is approximately 93% completed.
- Site Access Agreement (SAA) process is approximately 97% completed.
- Started construction on approximately 79% of sites.
- Equipment ordered is approximately 98% completed.
- Site optimization is approximately 48% completed.
- Zero recordable injuries to date.

Phase 4 work such as site optimization and microwave alignment is currently underway.

Narrow-banding is underway for Channel 16. Technical Lead Engineer, Ted Pao, is leading the coordination between the project team and the LA County Sheriff's Dept.

Site construction at US Forest Service (USFS) sites were severely impacted by fires in the months of September, October and November 2020. However, all of the forest sites were able to re-start work with the exception of FRP which will remain shut down until mid-April 2021, or as soon as the access road re-opens. The vast majority of the USFS sites will be completed on or before March 1, 2021.

JD:jh



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SCOTT EDSON EXECUTIVE DIRECTOR

January 19, 2021

To: LA-RICS Joint Operations and Technical Committee Members

From:

Scott Edson 56 Executive Director

DISTRIBUTION OF THE LARTCS/ACVRS CHANNEL PLAN

The purpose of this discussion item is to provide the Committee Members an opportunity to discuss the distribution of the LARTCS/ACVRS Channel Plan so that members and SoCal agencies have time to insert the new frequencies into their radio code plugs.

TP:jh

Attachment





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SCOTT EDSON EXECUTIVE DIRECTOR

January 19, 2021

To: LA-RICS Joint Operations and Technical Committee Members

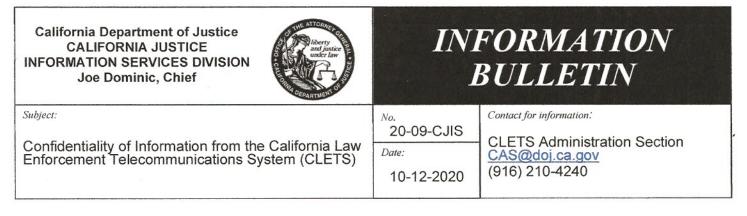
From: Scott Edson Scott Aban Executive Director

CALIFORNIA DEPARTMENT OF JUSTICE (DOJ) BULLETIN

The purpose of this discussion item is to provide the Committee Members an opportunity to discuss LA-RICS plans for encryption and how agencies can operate their radios in encryption mode if they choose to do so.

SAC:jh

Attachment



TO: ALL CLETS SUBSCRIBING AGENCIES

Law enforcement and criminal justice agencies authorized by the California Department of Justice (CA DOJ) to access the CLETS must adhere to the requirements detailed in the CLETS Policies, Practices and Procedures (PPP) and in the Federal Bureau of Investigation (FBI) Criminal Justice Information Services (CJIS) Security Policy to ensure the confidentiality and integrity of the data therein.¹ More specifically, and as detailed further below, access to certain Criminal Justice Information (CJI) and Personally Identifiable Information (PII) must be limited to authorized personnel; and the transmission of such information must be encrypted. Although generally applicable, the information in this bulletin is particularly relevant to the radio transmission of protected data.

Allowable "access" to CJI and PII, derived from CLETS, is described in CLETS PPP section 1.6.4:

Only authorized law enforcement, criminal justice personnel or their lawfully authorized designees may use a CLETS terminal or have access to information derived from CLETS. Any information from the CLETS is confidential and for official use only. Access is defined as the ability to hear or view any information provided through the CLETS.

The FBI and the CA DOJ establish policies and procedures related to the usage and protection of CJI that govern the usage of the CLETS. The policies define CJI, classify them as restricted or unrestricted, and limit the amount and types of information that can be broadcast over unencrypted radio channels in order to protect sensitive CJI and PII.

Generally, PII is information that can be used to distinguish or trace an individual's identity, such as an individual's first name, or first initial, and last name in combination with any one or more specific data elements (see FBI CJIS Security Policy section 4.3.). Data elements include Social Security number, passport number, military identification (ID) number and other unique ID numbers issued on a government document. The most common data elements encountered during field operations include a driver license number or ID number.

The transmission of sensitive CJI and PII must be encrypted pursuant to the FBI CJIS Security Policy sections 5.10 and 5.13; and access may only be provided to authorized individuals as defined under the CLETS PPP and the FBI CJIS Security Policy.

¹ For reference, please refer to the CLETS PPP at https://oag.ca.gov/sites/default/files/clets-ppp%2012-2019.pdf and the FBI CJIS Security Policy at https://www.fbi.gov/file-repository/cjis_security_policy_v5-9_20200601.pdf/view. See also Government Code section 15150 et seq. and California Code of Regulations, title 11, section 703.

Information Bulletin Confidentiality of CLETS Information Page 2

Compliance with these requirements can be achieved using any of the following:

- Encryption of radio traffic pursuant to FBI CJIS Security Policy sections 5.10.1.2, 5.10.1.2.1, and 5.13.1. This will provide the ability to securely broadcast all CJI (both restricted and unrestricted information) and all combinations of PII.
- Establish policy to restrict dissemination of specific information that would provide for the
 protection of restricted CJI database information and combinations of name and other data
 elements that meet the definition of PII. This will provide for the protection of CJI and PII while
 allowing for radio traffic with the information necessary to provide public safety.

If your agency is not currently in compliance with the requirements outlined herein, please submit an implementation plan to the CA DOJ, CLETS Administration Section, no later than <u>December 31</u>, <u>2020</u>. The plan must be on agency letterhead and signed by the Agency Head (e.g., Sheriff, Chief); include a detailed description of how radio communications will be brought into compliance (e.g., encryption), or how the risks will be mitigated through policy if unable to implement the required technology; and must include the projected timeline as to when the issue will be resolved.

For questions about this bulletin, contact the CLETS Administration Section at <u>CAS@doj.ca.gov</u> or (916) 210-4240.

Sincerely,

JOE DOMINIC, Chief California Justice Information Services Division

For XAVIER BECERRA Attorney General

AGENDA ITEM F - ATTACHMENT