SAFECOM Guidance on Emergency Communications Grants
Frequently Asked Questions: Understanding Project 25 Standards and Compliance

This document summarizes compliance requirements within the Project 25 (P25) Suite of Standards outlined in the *SAFECOM Guidance on Emergency Communications Grants* (*SAFECOM Guidance*). State, local, tribal, and territorial recipients of federal grants for emergency communications projects should refer to these Frequently Asked Questions to understand P25 compliance and find necessary resources. For this document, the terms "I" and "my" refer to the agency grant applicant seeking federal funds for emergency communications projects.

Project 25

Q1.   What are P25 standards?

P25 is a Suite of American National Standards Institute (ANSI) Accredited Technical Standards and specifications that promote interoperability among digital two-way land mobile radio (LMR) communications products provided by different manufacturers. The standards focus on meeting the public safety community's unique mission and critical voice communications requirements. The objective is to provide technical specifications that ensure communications equipment is interoperable, regardless of manufacturer. The P25 Suite of Standards is published by the Telecommunications Industry Association (TIA), a recognized ANSI standards development organization, and thus is also known as TIA-102 standards. The P25 Steering Committee publishes a list of *Approved Project 25 Suite of Standards* that includes the most recent documents and revisions.

Q2.   What is the P25 Compliance Assessment Program (CAP)?

The P25 CAP is a formal, independent testing process administered by the Department of Homeland Security (DHS) Science and Technology Directorate, to ensure communications equipment offered by suppliers complies with the applicable published standards. Through this third-party testing by independent laboratories, the P25 CAP assures public safety agencies that the communications equipment they purchase complies with P25 standards for performance, conformance, and interoperability. Compliance test results, official summary test reports, and suppliers' declarations of compliance are available at dhs.gov/science-and-technology/p25-cap.

Q3.   What does P25 compliance mean?

In general, compliance means that equipment conforms to the technical specifications in the standard. However, federal grantors may have additional requirements beyond the P25 standards and grant recipients must address other compliance considerations, depending on operational requirements. To maximize interoperability, grant recipients should verify that digital voice systems and equipment to be purchased with federal grant funds comply with the P25 Suite of Standards as specified in their program's grant guidance. In addition, recipients should include specific performance expectations for the systems or equipment as P25 compliance alone does not guarantee agency needs will be met. Overall, this compliance preserves the value of federal investments in interoperable communications solutions for state, local, tribal, and territorial emergency responders.

Q4.   Why is purchasing P25 compliant equipment so important to the public safety community?

Purchasing P25 equipment ensures that digital LMR systems are compatible with other P25 systems from different manufacturers and thus will enable interoperable communications among emergency responders from various agencies, jurisdictions, and levels of government. P25 standards also enable manufacturers to compete on a more level playing field, providing agencies with a broader range of options when purchasing equipment.

P25 Purchases Using Federally-Funded Grants

Following the tragic events of September 11, 2001, Congress passed legislation to improve the interoperability of public safety communications systems and equipment. The legislation mandates that new or upgraded equipment must be interoperable in accordance with P25 standards. To assist agencies in meeting this mandate, federal grant programs and policies support the purchase of P25 compliant LMR equipment.

Q5. **When applying for a federally-funded emergency communications project, how do I demonstrate that purchases are P25 compliant?**

To ensure equipment and systems comply with the P25 Suite of Standards, grant applicants/recipients should:

- Review the technical specifications detailed in the *P25 Technology Interest Group's (PTIG) Capabilities Guide* to determine which standards are applicable to the proposed equipment purchase.

- Provide specific and detailed technical requirements and expectations for all functions, features, and capabilities of to be procured equipment and services to comply with all applicable P25 standards and expectations for interoperability in any Statements of Work or acquisition documents for communications procurements funded through federal grants.

- Develop acquisitions and project implementation plans, including comprehensive feature and function interoperability acceptance test plans between the procuring entity and the supplying vendors or manufacturers. These interoperability tests, based upon stated operation requirements and expectations, should illustrate successful interoperability of features, functions, and services when operational environments contain multiple products from various vendors or manufacturers.

- Ensure all new and upgraded P25 eligible equipment, features, functions, and capabilities selected for procurement are P25 compliant and interoperable. If P25 LMR equipment and systems include non-standard features or capabilities when a comparable P25 feature or capability is available, recipients must also purchase the P25 standards-based feature or capability to ensure interoperability.

- Obtain documented evidence of P25 standards compliance from the manufacturer showing the equipment has passed all applicable compliance assessment test procedures and interoperability test procedures, if applicable, as defined in the latest P25 Compliance Assessment Bulletins for testing requirements. If such documentation is not available through the P25 CAP, agencies should obtain documented evidence from the manufacturer stating that all applicable tests were conducted in accordance with published P25 test procedures and successfully passed.[1] Contact the P25 CAP at P25CAP@hq.dhs.gov for additional guidance.

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[1] Regardless of the status and availability of P25 CAP testing documentation, grant recipients should include comprehensive acceptance test plan(s) criteria in their procurement and contract documents. The manufacturer/vendor should verify the equipment or services are P25 standards compliant and interoperable with other equipment, features, functions, and capabilities.

Q6.   **What will the federal agency issuing grant funding use to confirm equipment in my grant application is P25 compliant?**

When reviewing grant applications, the federal agency will verify that proposed equipment purchases are P25 compliant by:

- Confirming the equipment to be purchased is on the *P25 CAP Approved Equipment List*. If the item is on the list, it is P25 compliant.

- Referring to the *DHS Authorized Equipment List* (applicable to DHS/Federal Emergency Management Agency [FEMA] grants only). Note P25 standards may not be applicable to some items on this list.

- Reviewing the application package to confirm the applicant provided documentation from the manufacturer verifying the purchase is P25 compliant.

If the purchase cannot be verified as P25 compliant using these methods, the federal agency has the authority to request additional information, grant a waiver, or deny the purchase.

Q7.   **What if I want to purchase non-compliant P25 equipment?**

When a grant recipient wants to use federal funds to purchase equipment that does not align with P25 standards, the recipient should consult with the federal agency to determine if non-compliant P25 equipment is allowable. In such cases, written justification is often required.

Many agencies do not approve of non-standards-based equipment unless there are compelling reasons for using other solutions. Funding requests to replace or add radio equipment to an existing non-compliant P25 system (e.g., new portable radios for an existing analog system) will be considered if there is a clear rationale for such equipment and written justification of how the equipment will advance interoperability and support eventual migration to an interoperable system. The written justification should also explain how that purchase will serve the needs of the applicant better than equipment or systems that meet P25 standards.

P25 Compliance for DHS Grant Recipients

Q8.   **DHS/FEMA requires its grant recipients to comply with the SAFECOM Guidance. As a DHS grant recipient, am I also required to comply with P25 standards?**

Yes, DHS/FEMA grant recipients are required to comply with P25 standards when purchasing LMR equipment. This requirement and other conditions specific to DHS/FEMA grant recipients are outlined in Appendix D of the *SAFECOM Guidance*. For additional information, reference the *DHS Authorized Equipment List* to determine allowable equipment types for individual grant programs. If the proposal includes any non-compliant P25 LMR equipment, DHS/FEMA grant recipients must apply for prior approval.

P25 Compliance Resources

Q9.   What resources should I use when applying for emergency communications grant funding?
Grant applicants are strongly encouraged to work with their Statewide Interoperability Coordinator (SWIC). The SWIC should review the application prior to submission to ensure projects support the state or territory's strategy to improve interoperable emergency communications. The SWIC should also confirm the funding request aligns with the latest versions of their *Statewide Communication Interoperability Plan* and the *National Emergency Communications Plan*, as these are vital plans to improving interoperability.

Q10.   Where can I find more information about P25 standards and/or compliance?
Grant recipients are invited to explore the wide range of information available from government and industry sources, including:

- P25 Suite of Standards for Land Mobile Radio: tiaonline.org/all-standards/committees/tr-8
- P25 Technology Interest Group: project25.org (Free registration required)
- P25 Compliance Assessment Program: dhs.gov/science-and-technology/p25-cap
- P25 Compliance Assessment Program list of approved radio equipment: dhs.gov/science-and-technology/approved-grant-eligible-equipment
- P25 Steering Committee's Statement of P25 User Needs: cisa.gov/safecom/p25
- Best Practices, Guidelines, and Considerations for Encryption: cisa.gov/safecom/encryption
- Best Practices for Planning and Implementation of P25 Inter-RF Subsystem and Console Subsystem Interfaces (ISSI and CSSI), Volumes I and II, and Primer: cisa.gov/safecom/p25
- SAFECOM and the National Council of Statewide Interoperability Coordinators' Funding and Sustaining Land Mobile Radio Trio: Materials for Decision-Makers: cisa.gov/safecom/funding

About SAFECOM

SAFECOM was formed in 2001 after the terrorist attacks of September 11, 2001, as part of the Presidential E-Government Initiative to improve public safety interoperability, allowing emergency responders to communicate effectively before, during, and after emergencies and disasters. SAFECOM is managed by the Cybersecurity and Infrastructure Security Agency (CISA). Through collaboration with CISA, emergency responders, and elected officials across all levels of government, SAFECOM works to improve emergency response providers' inter-jurisdictional and interdisciplinary emergency communications interoperability across local, regional, tribal, state, territorial, international borders, and with federal government entities. For additional information regarding SAFECOM, visit cisa.gov/safecom.