April 2, 2015

The Honorable Greg Walden
Chairman
Subcommittee on Communications and Technology
Committee on Energy and Commerce
U.S. House of Representatives
2125 Rayburn House Office Building
Washington, D.C. 20515

Dear Chairman Walden:

Pursuant to your request made at the March 19, 2015, Energy and Commerce Subcommittee on Communications and Technology hearing, "FCC Reauthorization: Oversight of the Commission," please find enclosed the final consultant's report regarding the closure and consolidation of the Federal Communication Commission’s field offices. With the help of current technologies and the strategic re-deployment of personnel and equipment, I believe that the proposed approach would give the Commission the necessary tools to get the job done, with greater efficiency. The bottom line of this report is that the FCC’s field office structure is 20 years old, too costly and not effectively focused on 21st century realities.

With a business-like approach, we took a hard look at the Commission’s budget and facilities looking for areas where we could modernize, eliminate redundancies, and realize cost-savings. The field offices quickly emerged as facilities that needed a thorough operational review. It has been over 20 years since the last major reorganization of our Enforcement Bureau’s field activities. It would have been irresponsible not to consider field office consolidation and efficiency improvements as part of the Commission’s overall footprint reduction and long-term management plan. Accordingly, in October 2014, the Enforcement Bureau and the Office of the Managing Director engaged outside, independent consultants to drill down on the data about the field offices’ activities and resources.

As an initial matter, it is important to recognize the high cost of maintaining the current field office structure: our licensees pay over $20 million a year to support 24 field sites and the average administrative overhead cost level to maintain just one field location is $400,000. Overall support costs per FTE for field staff are more than double that of our headquarters staff.

- There is an overabundance of managerial positions. The average field location has just 4.5 full time employees ("FTEs") (with many having just 1 or 2 FTEs). Yet for every 4 field employees, there is 1 manager.
- There are unaligned resources – some field offices have a 2 vehicle per agent ratio.
- The rent for these field offices is disproportionate. The square footage per employee in field offices ranges from 3,921 to 381 square feet. By comparison, FCC headquarters operates with 272 square feet per employee (with a target to reduce it to 180 after FY2017 as part of our restacking/move).
Against this backdrop of high costs, our field offices are caught in outdated modes of enforcement. Twenty years ago, the field offices were tasked with: (1) inspecting local licensee activities and encouraging compliance; and (2) investigating radio frequency interference and unauthorized radio spectrum usage. These priorities placed a premium on local presence in a relatively large number of locations.

A principal activity of yesteryear was the physical inspection of records and licensees’ offices. Today those records are online. Similarly, much time used to be spent on direct visual inspection of antennas to check paint and lighting. The realities of today are that with modernized equipment, regulatory changes, remote operations, and monitoring capabilities, as well as strategic partnerships with other agencies, these inspections and compliance tasks require far fewer staff and localized resources. Maintaining an office with six people, for instance, where on average each agent only handles one radio interference case every five weeks is not a wise allocation of resources. And current overall activity metrics for our field offices tell the story even more powerfully: less than half of total field personnel time today is spent on any kind of spectrum enforcement activity, and a much smaller amount is spent on the most critical spectrum priorities such as public safety interference.

While interference resolution anywhere in the country is and will remain a top FCC priority, our methods and organization must evolve and improve with industry changes. The central management question therefore is whether it remains necessary to have expensive-to-maintain offices with local staff thinly spread across 24 markets, or instead whether the same results could be produced at lower costs by combining more efficient local scale in a smaller number of locations with the addition of a more mobile, flexibly deployable team of agents?

The answer is a resounding “yes.” Our modernization plan will include:

- Right-sizing our geographic footprint from 24 to 8 field offices that will keep agents productively on the move;
- Strategically placed, pre-positioned direction-finding vehicles and equipment in 9 additional cities to allow agents to fly to those cities, pick up the equipment, and travel to a target area;
- Adjusting the number of agents from 63 to 33 field agents, all of whom will have electrical engineering backgrounds;
- Streamlining the management structure from 21 to 5 individuals, and refocusing on mobile solutions and partnerships.

I am confident that a new alignment of resources will not adversely affect our public interest mission. Our primary goal will continue to be responding to spectrum interference complaints, including responding to any public safety interference within one day, with the vast majority of the nation reachable within 4-6 hours. A newly created “tiger team” in the Columbia, Maryland, office will provide enforcement throughout the country including
inspections that are not complaint-driven and support other field offices in serving their redefined coverage areas.

The plan also recognizes the realities of key markets. New York and Miami, the two most significant hubs for pirate radio, will see a 30 percent increase agents with electrical engineering training, capable of responding to the most complex technical issues.

Our plan of relying more on flexibly deployable agents is not unique. The FAA, for instance, relies on an interference hunting team for all FAA radio communications investigations. This team is comprised of 7 people distributed across 7 cities across the country to cover the entire United States; in 2014 alone this team investigated 2,700 interference cases. Although our mission is much broader, this model demonstrates that the FCC can achieve greater efficiencies with our modernization plan.

Mr. Chairman, we take seriously your admonition to operate more efficiently. We have developed this plan in accordance with this goal, and believe once implemented it will update and overhaul outdated management models, realize significant cost-savings and make the FCC a 21st century agency.

Please don’t hesitate to contact me or my staff with any follow up questions on this matter.

Sincerely,

[Signature]

Tom Wheeler

Enclosure

cc: The Honorable Fred Upton
    Chairman, Committee on Energy and Commerce

The Honorable Frank Pallone
Ranking Member, Committee on Energy and Commerce

The Honorable Anna G. Eshoo
Ranking Member, Subcommittee on Communications and Technology
Memorandum

DATE: March 10, 2015
TO: Enforcement Bureau Field Staff
FROM: Travis LeBlanc, Chief, Enforcement Bureau and Jon Wilkins, Managing Director
SUBJECT: Management Recommendations Regarding Enforcement Field Modernization Phase I
CC: Ana Curtis, President, NTEU Local 209

The current model of the Field was adopted approximately 20 years ago. While our field operations have served a vital part of the agency’s mission, significant technological changes and increasing resource limitations require a fresh look at this operating model. In October 2014, the Enforcement Bureau (Bureau) and the Office of the Managing Director (OMD) embarked on an effort to modernize the Bureau’s Field operations. This project sought to ensure that the Field’s structure, operations, expenses, and equipment were properly aligned with the Commission’s overall mission and resources.

As part of this effort, the Commission engaged outside consultants to conduct an independent analysis of the operating model. Over a five-month period, they collected input from more than 160 employees, outside experts, and internal and external stakeholders. They also closely reviewed prior studies, the Enforcement Bureau Automated Tracking System, and the field operations of other government agencies.

The Bureau and OMD management have used this data and analysis as input in formulating a recommendation to the Commission. We believe that our recommendation to the Commission more efficiently uses Commission resources while simultaneously making significant progress in modernizing our methods and meeting our enforcement responsibilities in the 21st Century. The recommendation consists of:

Aligning our Field focus with the priority of securing networks and resizing our Field resources to support this mission:

- Adjusting the primary focus of the geographically deployed Field offices to radio frequency spectrum enforcement
- Adjusting from 63 to 33 field agents in the Enforcement Bureau
- As part of the 33, staffing out of the Columbia, Maryland office a “Tiger Team” of field agents that will be flexible enough to support other high-priority initiatives of Enforcement Bureau or other Headquarter entities
- Requiring all field agents to have electrical engineering backgrounds to support the primary focus on RF spectrum enforcement
- Standardizing both our investigation and sanction processes to facilitate delivering high-impact work for our constituents in an efficient manner and increasing training on such standardized processes
Reducing administrative overhead expended to manage and support Field Operations:
- Streamlining our Enforcement Field management structure from 21 director positions to 5
director positions, increasing the median reports per manager from 4 employees currently to 10
employees
- Reducing from 10 to 3 administrative support positions

Downsizing our field office footprint to improve the efficiency of our resource expenditures:
- Downsizing our geographic footprint from 24 sites to 8 sites, with pre-positioned equipment in
several other select cities, with emphasis on population/spectrum use density
  - Maintaining offices in or near New York City; Columbia, Maryland; Chicago; Atlanta;
    Miami; Dallas; Los Angeles; and San Francisco
  - Pre-positioning equipment in or near several other cities, initially including Kansas City;
    Denver; Salt Lake City; Phoenix; Seattle; San Juan; Anchorage; Honolulu; and Billings,
    Montana
- Modifying our current leased facilities to improve our resource efficiency in line with several
other federal agencies
  - Working with our lessors in some locations to downsize our footprint
  - Relocating field offices to proximately located FCC owned property in or near Columbia,
    Maryland; San Francisco; and Atlanta

Focusing the Equipment Development Group on managing the entirety of our deployed equipment
and developing mobility solutions to support the Field’s mission
- Consolidating the overall equipment management function into our Equipment Development
Group, based in Atlanta, to drive economies of scale and increased utilization opportunity
- Developing agent mobility and equipment portability solutions to increase our response time
  capability
- Establishing beneficial partnerships between the Field and other organizations that may support
  increasing our effectiveness in delivering against the mission

Implementing a nationwide outplacement effort to assist all affected employees
- Program will assist displaced employees in finding positions in the public or private sectors,
  including other vacancies within the Commission for which they are qualified and selected.

We recognize that you undoubtedly have many questions about the recommendation and the process for
moving forward. Accordingly, we will have a briefing later this week to discuss the recommendation in
more detail.
FCC Enforcement Bureau Field Modernization

Consultants' Report
March 31, 2015
Field aligns to one of Enforcement Bureau’s key priorities

Alignment of EB Divisions

Enforcement Bureau Priorities

Againts Priorites

- Spectrum Enforcement Division
- Market Disputes Resolution Division
- Telecommunications Consumers Division
- Investigations & Hearings Strike Force

Securing Networks

4

- Safeguarding Competition

3

- Protecting Consumers (Fraud, Waste, and Abuse)

2

- Policing Integrity

1
Execution of activities in an efficient manner most effectively and cost-effectively leads to clear linkage of activities to commission's priorities.

For resources, initiatives competing high priority pressures and other overall budgetary scarce resources, efficiency systems are not fully equipped, and skills, processes, management, current locations, and evolving priorities with commission's not optimally aligned enforcement activities evolve.

EB Field Modernization project initiated to address several issues.
Team engaged 160+ stakeholders across several groups
Current EB Field: 108 Personnel across 24 sites
<table>
<thead>
<tr>
<th>108</th>
<th>Current Field Personnel (#)</th>
<th>Personnel Subcategory</th>
<th>Totals</th>
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<tr>
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<td>Field Agent Management</td>
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<td>Field Agent</td>
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<td>EDC</td>
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<td>Field Admin Support</td>
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<td>Legal Counsel</td>
<td>5</td>
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<tr>
<td></td>
<td></td>
<td>Other</td>
<td>6</td>
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<td></td>
<td></td>
<td>Regional Counsel</td>
<td>3</td>
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<tr>
<td></td>
<td></td>
<td>Office Assistant</td>
<td>8</td>
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<td></td>
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<td>EDC Engineer Technician</td>
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<td>Compliance Specialist</td>
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<tr>
<td></td>
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<td>Compliance Assistant</td>
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<tr>
<td></td>
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<td>EDC Director</td>
<td>1</td>
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<tr>
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<td></td>
<td>Deputy Regional Director</td>
<td>3</td>
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<td></td>
<td>Regional Director</td>
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<td>108</td>
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Field has 108 personnel totaling ~$1.2M annually in wage and benefits.
EST. FY14 $21M Field Spend breakdown by cost element and office related expenses approximately 20%
EB Field focuses on three types of work

Addressing Complaints
"Reactive"

Auditing to Find Non-Compliance
"Proactive"

Expected Outcome

<table>
<thead>
<tr>
<th>Support for Other FCC Initiatives</th>
<th>Compliance by Licensees</th>
<th>Radio Frequency Enforcement</th>
</tr>
</thead>
<tbody>
<tr>
<td>E.g., responding to complaints about interference or unit towers</td>
<td>E.g., random inspections of facilities to identify potential violations</td>
<td>E.g., responding to complaints about interference or unit towers</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Evidence Collected</th>
<th>Identification of Regulation Violations</th>
<th>Orderly Use of Radio Frequency Spectrum</th>
</tr>
</thead>
<tbody>
<tr>
<td>% of total Agent productive time</td>
<td>% of productive time based on Field surveys, interviews, and level of effort modeling</td>
<td>% of total Agent productive time</td>
</tr>
</tbody>
</table>
Organizational effectiveness gaps must be addressed under all scenarios.

Missions and priorities of the Enforcement Bureau leaf mission are an output of EBC and Enforcement Bureau enforcement activity.

Mission: Case prioritization defines the Field.

What mission of the Field is expected output and how are they prioritized.

What cases are addressed?

What equipment is required?

What personal structure and alignment are needed?

Where do we locate Field?

Skills are needed.

What will we do the process and alignment?

What equipment is required?

Effective measures and decision-making, and team morale, alignment, and business systems, data, and analytics.

Field Attributes:

Field Mission:

Evaluation of all aspects of Enforcement Bureau Field.
Activities such as administration of non-operational tasks, compliance actions, and agent skills.

- Approximately 25% of Field time is spent on non-operational activities.
- Approximately 12% for several other proactive matters are outside agent skills.
- Another 8% for several other proactive matters are high.

Significant field time is spent on matters like tower inspections, accounting for the utility of on-site inspections.

Radio Operations
- Addresses interference and public safety interference, 7%.
- Of this time, 8% addresses cellular / LTE interference and 77% addresses RF spectrum enforcement.

Only 40% of field time addresses RF spectrum enforcement.

Against FCC Enforcement mission priorities, current Enforcement Bureau Field Resources are not aligned with objectives.
Number of matters in Activity Tracking System (FY14)

Distribution of case load
Inefficiencies in terms of time spent and management structure

How agents spend their time

- Complaint Case work
- Initiating Case work
- Non-Operational activities

Median of 4 reports per manager

Additionally, large management structure with 23 Field Offices

Note: Based on ORI 2014: Time assessment based on field survey and level of effort modeling
Shifting away from using the MDF Vehicles as our primary means to direction

Vehicle for integration
~ 1.5 to 2.0 man year equivalents per
electronics, and outside services
~$90K - $115K each, including vehicle,

Resources consumed

"Portable equipment"
more of our work is necessary
"Vehicles are useful, but more and
"Vehicle 15-20% of the time"
"We only need the undercover
be for direction finding as we used to
"We're not as dependent on our cars

Quotes about the Vehicles

Finding Vehicles

Significant equipment development time spent on direction
Employee engagement is critical for success of ongoing field operations and

```
Success
I have no idea what HQA defines as
```

`valued`
and makes us feel like our work is not
submitting case, which is demoralizing

```
us down
We rarely hear what happens [after]

 Feel extra steps [above immediate
```

Quotes From Interviews

`Unclear linkage to mission
layers; perceived lack of feedback, and
likely driven by excessive management`

---

Detractors

% 48%

Neutral

% 28%

Promoters

% 23%

Net Promoter Score across Field is -25%

---

Overall morale and retention issues are a risk to the field.
Future Vision for the EB Field
Benefits and Partnerships

Re-focus development towards mobility solutions and Refocus development towards reduced costs up to 68% while reducing our direct office related costs up to 81% of US population.

- Positioned equipment in other cities
- Positioned equipment in dense cities, plus pre-Downtown geographic footprint from 24 to 8 sites in several of the most populous spectrum
dense cities.

- Also, reducing from 10 to 3 admin support positions located in field reports from 4 employees to 10 employees per manager
- Lean management structure from 21 to 5, increasing median training

- Standardize processes and sanction application with increased
- Start all agent positions with engineering/technical backgrounds
- Start a "Tiger Team" to support other high-priority initiatives

- Spectrum

- Adjust from 63 to 33 field agents with a primary focus on RF

Recommended adjustments to align to future vision
Engaged experts on potential future state of RF spectrum trends that may change field's work
### Radio Frequency Spectrum Management

#### Needs for a Geographically Dispersed Field

<table>
<thead>
<tr>
<th>Requirement</th>
<th>Example</th>
<th>Category</th>
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</thead>
<tbody>
<tr>
<td>Improve Efficiency</td>
<td>Improve the highest</td>
<td>Location Change</td>
</tr>
<tr>
<td>Reduce Initiatives</td>
<td>Reduce the highest</td>
<td>Alternatives Exist</td>
</tr>
<tr>
<td>Focus on Matters</td>
<td>Focus on the highest</td>
<td>Response Line</td>
</tr>
<tr>
<td>Tower Compliance</td>
<td>Tower Compliance</td>
<td>Flexibility with Specific Site</td>
</tr>
<tr>
<td>Network Time</td>
<td>Network Time</td>
<td>Close Enough</td>
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<tr>
<td>Quick Response</td>
<td>Quick Response</td>
<td>Need for Significant</td>
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### Team Distribution

<table>
<thead>
<tr>
<th>Needs</th>
<th>Team Distribution</th>
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<tbody>
<tr>
<td>Staff</td>
<td>Engineering</td>
</tr>
<tr>
<td></td>
<td>Electrical</td>
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<tr>
<td></td>
<td>Staff (all as offices to geographic)</td>
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<td></td>
<td>Allocate FTEs</td>
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</table>

### Adjustments to Staffing

<table>
<thead>
<tr>
<th>Requirement</th>
<th>Example</th>
<th>Category</th>
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<tbody>
<tr>
<td>Address Competitely</td>
<td>Address Competitely</td>
<td>Location Change</td>
</tr>
<tr>
<td>Address Safety</td>
<td>Address Safety</td>
<td>Alternatives Exist</td>
</tr>
<tr>
<td>Equipment</td>
<td>Equipment</td>
<td>Flexibility with Specific Site</td>
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<tr>
<td>Public Safety Radio</td>
<td>Public Safety Radio</td>
<td>Close Enough</td>
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</table>

### Adjustments to Needs

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<thead>
<tr>
<th>Requirement</th>
<th>Example</th>
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<tr>
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<td>Network Time</td>
<td>Need for Significant</td>
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</table>

### Key Points

1. Need for quick response.
2. Close enough to be specific.
3. Ability to adjust specific site.
4. Need flexibility with specific site.
5. Alternatives exist for location change.
6. No specific time to audit.
7. Specific site with flexibility.
8. Flexibility with specific site.
10. Alternate response line.
11. Equipment response time.
12. Response time.
14. Response time for specific site.
15. Specific site needs to be close enough.
17. Equipment response.
18. Response time.
19. Alternate response line.
20. Equipment response.
22. Alternate response equipment.
23. Response time for specific site.
Travel may dictate prioritization

Pros:
- Improved efficiency
- Increased productivity
- Easier to manage
- Office space
- Resources allocated to people versus
- Lean management structure
- Timing problems within appropriate
- Some issues may not be
- Large office
- Single location for EB Field
- Example

Cons:
- Limits feasibility – led to specific locations
- May drive higher labor costs just to manage locations
- Scale-back requirements can leave offices empty
- Square feet in each office
- Discriminates by scale – high overhead positions of
- Costly – potentially takes away from other priorities
- Easy to respond to issue areas
- Highly visible to consultants
- Transportation of equipment is simplified
- Quick response time
- Close to the site of issues

Must Balance:
- What level of management is
- Types
- Potentially for different location – How close is close enough
- Expenses versus personnel
- Expenses versus budget we
- How much of our budget we
devote to office related

Example

Resource Location Selection requires balance between amount of
Office Location Selection requires allocation of
Amount of Resource Allocated

Downsize Field Sites
**Telework models were evaluated across all office deployment scenarios.**

- **Pre-positioned sites**
  - Angeles, San Francisco, Honolulu, Austin, Miami, San Juan, Dallas, Los Angeles
  - Offices in Columbia, New York, Chicago, Denver, Atlanta

- **Populous areas**
  - Mass per office: addresses most geographic coverage and critical responsibility
  - 11 offices

- **Population trend**
  - With large geography to cover out West and South East
  - Majorities of populous cities covered

- **Pre-positioned sites**
  - Angeles, Dallas, Los Angeles, with 11 equipment
  - Offices in Columbia, New York, Chicago

- **Response**
  - Current equipment: large areas of unmet needs
  - Agents unable to address public safety needs

- **Cases not addressed**
  - Address cases
  - Agents travel out of FCC headquarters to

**Evaluated a range of office deployment scenarios**

**Downsize field sites**
Within ~4-hr response time versus 24-hr model that covered ~90%

Eight site model with pre-positioned vehicles covers ~80% of US population

Recommendations:
- Pre-position 9 Radio
- FCC-owned space
- Consolidate 2 sites into 1
- Transportation space
- Availability of current spectrum / population density
- Spectrum / population

Removed 4 from 24, selected for:
- Consolidate to 8 sites

Office Space
as more mobile equipment solutions are developed

The entire country can be reached within a day from these offices,
Agents
Planned: 3
~14% RF LoE

Agents
Planned: 4
~12% RF LoE

Agents
Planned: 4
~12% RF LoE

Agents
Planned: 5
~16% RF LoE

Agents
Planned: 4
~14% Tech LoE

2014 Office Location

Recommended Office Location

RF Spectrum case level of effort (LoE) by approximate areas of responsibility

Load
Agent positions by office aligned with expected RF Spectrum case

Downsize Field Sites
Recommended optimizations:

- **Org Structure**: Optimizing the go-forward organization

**Recommendations:**

- Add dedicated field agents with EES specialists to all offices.
- Eliminate compliance clarity required skills.
- Reduce agents from 63 to 33.
- Adjust overall field size from 108 to 50.

**Bureaus and Offices in Evolving Missions and Priorities**

Organization designed to allow flexibility in supporting other divisions.

**Notes:**

- Lean management
- Director
- Field
- Columbia
- Satellite Offices
- Dallas
- San Fran.
- Chicago
- Miami
- New York

**Regions:**

1. Region 1
2. Region 2
3. Region 3

**Field Director**
Engage other organizations to increase partnerships.

Establish beneficial integration.

Develop strategies for agent mobility.

Refocus Development on medium-term and future strategies.

Manage entirety of deployed equipment.

Become the central owner of equipment.

Training, and procurement research.

Staging, maintenance, and calibration.

Inventory, refresh plans, deployment and development of equipment.

Efficent, effective, equipment, procurements.

Potentially sharing data.

Developed to direction finding vehicle spectrum enforcement.

Equipment, portability, and shared equipment.
Case Management System
- Measure Field productivity metrics through
- Collect data for policy making and

Trainings to increase efficiency
- and sanction delivery and develop
- Investigation and Inspection procedures.
- Standardize matter prioritization,

and priorities
- with HQ and clarify alignment with mission
- making, strengthen communication linkage
- Increase Field's participation in decision

Continuing after Implementation

In addition, address organizational effectiveness during change.
Covered with fixed DF
- NY, Chicago, and LA

Equipment available and mobile
Utilize commercially

Interference
- Travel to investigate

Dense flight activity
- Located personnel near

Across 7 cites
- 7 personnel, distributed
- Engage FCC at >4% of cases
- Cases in 2014
- ~2,700 RF interference

For navigation
FAA radio comms (voice)
Investigate interference to

Case Study: FAA Interference Hunting Team
Case Study: Railroad Safety Field
Without a decline in service of Field's most important matters, enables FCC to address emerging priorities within current budget environment.

- Priority initiatives against other high-priority, highest-impact, highest-priority, highest-impact.
- Aligns personnel.
- Scarcity of resources that can be redeployed.
- Frees up activity.

- Improve efficiency.
- Standardize processes to policy making.
- Improved systems to support tracking.
- Appropriately balanced management.

- Priorities aligned with Commission's work more closely within Enforcement.
- More clearly defined mission.

Recommendations provide several benefits for EB and FCC.
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<tbody>
<tr>
<td>Travel increase due to Tigger Team and less sites</td>
<td>0.2</td>
</tr>
<tr>
<td>1.6 - 2.5 space and relocations to owned</td>
<td>1.6</td>
</tr>
<tr>
<td>Several site reductions</td>
<td>3.7</td>
</tr>
<tr>
<td>7.9 - 8.0 support and relocation of Field</td>
<td>3.0 benefits</td>
</tr>
<tr>
<td>15.3 $M annual restructuring of Field</td>
<td>15.3</td>
</tr>
<tr>
<td>Total: $9M - $10M</td>
<td>$21M</td>
</tr>
</tbody>
</table>

**Key changes**

- Est. FY 14

**Run-Rate financial impact of recommendations is $9M-10M**
Recommendations
Estimate up to $2M - $4M in one-time costs required to implement

- System
- Additions to EBATS (Case Management
- Developer costs for functionality
- San Francisco owned office space
- Spaces where field agents will move, e.g.
- Construction costs for refurbishing
- Equipment, files, and office supplies
- Lease exit costs and shipping
- Lease exit costs, e.g. leave payout
- Estimate of potential personnel exit

Improvements
System
Space Refurbishment
Shut Down of Spaces
Adjustments
Personal Related

Depending upon how FCC decides to proceed, there are a variety...