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February 28, 2017

Mr. Ernest Lucier
Smart Cities and Communities, NCO
Suite II-405
4201 Wilson Blvd., Arlington, VA 22230

Re: Docket No. NSF FRDOC 0001, Smart Cities and Communities Federal Strategic Plan: Exploring Innovation Together

Dear Mr. Lucier:

The National League of Cities (NLC) submits this letter to provide feedback on the draft Smart Cities and Communities Federal Strategic Plan. As an advocate for the more than 19,000 cities, towns and villages in the United States, we welcome this opportunity to provide input on the ongoing development of our nation's smart cities framework. We commend the Smart Cities and Communities Task Force for its leadership in the development of the draft plan and for its commitment to aligning federal and non-federal stakeholders in a process that supports the needs of residents in all cities and communities. We offer comments on the following aspects of the plan:

Centering of Individual Cities' Needs and Priorities

We thank the Task Force for centering the unique needs and priorities of individual cities. Any federal program that intends to address the future needs of cities of all geographies and sizes must focus on understanding the challenges and desires of those unique communities. The final plan should particularly account for the needs of small and mid-sized cities, which constitute the majority of American communities.

We urge the Task Force to include further engagement with state and national municipal associations, such as the National League of Cities, as conveners and bridges between individual communities and functional silos. We also encourage the Task Force to build local elected officials into the plan as key stakeholders. Local elected officials not only champion the programs that will benefit their residents, they write the local ordinances and authorize the budget allocations that will allow smart city projects to move forward. Local elected officials must be a part of any national smart city planning process.

Facilitation of Data and Standardization

As NLC found in its recent report “Trends in Smart City Development,”¹ access by cities to data and best practices information is crucial for success. Many cities are already leading by example, by creating their own open-data platforms and information sharing initiatives. For smart city investments to scale and for best practices to spread, we agree that data must be portable and technology must be interoperable.

However, we urge federal stakeholders to work towards a standards development process that is not only industry-led. Standards development must be a joint effort led both by industry actors and the communities they serve. Cities are no longer mere clients for firms selling smart city technology – they are active proving grounds for a new way of life.

The Value of Security, Sustainability, and Economic Mobility

Finally, we applaud the Task Force for prioritizing smart city technologies and best practices that support security, community resilience, and economic mobility for all residents. Cities pursue smart technology to improve people’s lives. We agree that federally supported funding and programming to build smarter cities should focus on making cities’ data more secure, their infrastructure more sustainable, and on building more economic opportunities for all people.

Thank you for the opportunity to submit comments and for considering the perspective of our nation’s cities as you further develop the Smart Cities and Communities Federal Strategic Plan. If you have any questions, please do not hesitate to contact Angelina Panettieri at panettieri@nlc.org. Thank you for your consideration.

Sincerely,



Clarence Anthony
Executive Director and CEO
National League of Cities

¹ National League of Cities. “Trends in Smart City Development.” January 5, 2017.
<http://www.nlc.org/resource/smart-city-development>