



January 11, 2007

Ivan DeLoatch, Staff Director  
Federal Geographic Data Committee  
U.S. Geological Survey  
12201 Sunrise Valley Drive Mail Stop 590  
Reston, Virginia 20192-0002

Dear Mr. DeLoatch,

The Board of Directors of the Urban and Regional Information Systems Association (URISA) has reviewed the December 5 discussion draft for establishing the National Geospatial Advisory Committee (NGAC) prepared by the Federal Geographic Data Committee (FGDC). We appreciate the opportunity to offer our comments on the draft.

The URISA Board supports the formation of a national group for NSDI governance and concurs with the Western Governors Geographic Information Council (WG GIC) and the National States Geographic Information Council (NSGIC) that the proposed NGAC would be strengthened by three changes to the draft charter:

1. The NGAC should meet quarterly, not annually;
2. Geographic balance as well as stakeholder group membership should be considered in composing the NGAC; and,
3. The statement of ethics responsibilities must be clarified. (URISA has accepted a small grant from the FGDC. Does this preclude participation in the NGAC?)

The draft defers the important matters of NGAC composition and operating procedures until after the NGAC is formed. We request that additional comment be solicited before these matters are decided.

The NGAC, while useful and constructive, has a scope that is much curtailed from the original vision for a new National Geospatial Coordinating Council (NGCC), as recommended by the FGDC's own NSDI Future Directions Governance Action Team. A central component of the concept has been lost somewhere along the path from recommendation to implementation.

The NGCC was not intended to provide input *to* the FGDC; it was intended to receive input *from* the FGDC, which would be one of several NGCC members seeking to guide development of the NSDI and manage its operation. The original intent of the NGCC was to integrate the FGDC and other important spatial data suppliers and users. The current discussion draft seems to instead suggest that the NGAC is a mechanism for consolidating input from non-FGDC member entities and route it through the FGDC Chair. This approach, while recognizing the formal participation of more representatives, will actually dilute the influence for non-FGDC entities that presently participate as non-voting members. The Urban and Regional Information Systems Association (URISA) is such an entity.

There is also the matter of internal inconsistencies with the NGAC as presently proposed. For example, the NSDI Future Directions Governance Action Team proposed that the NGCC should include three rotating members of the FGDC, an OMB representative, and someone from the Federal CIO Council on the 25-member Council. The current proposal for the NGAC also lists federal government representatives, although it does not include the specificity of the Future Directions recommendation. Including federal representation on the NGAC makes sense only if the NGAC is to be the body where inter-stakeholder decisions are to be made. However, the rest of the draft discussion proposal makes it clear that the intent is for the NGAC to coordinate input from non-federal stakeholders for injection into an exclusively federal decision-making process. An NGAC

member does not even present the body's recommendations directly to the FGDC Steering Committee. Since all relevant federal government entities are already on the FGDC, how would their representation on a body providing "external" input to the FGDC be useful? More importantly, how would the NGAC increase nonfederal stakeholder input?

As defined in Executive Order 12906, the NSDI is "the technology, policies, standards, and human resources necessary to acquire, process, store, distribute, and improve utilization of geospatial data." This definition does not include the data itself, only the infrastructure by which such data may be acquired and accessed. The federal government is certainly an important and vital supplier and user of spatial data, but it does not represent the majority of such suppliers and users. State, regional, and local governments, non-governmental organizations, and the private sector provide the bulk of spatial data and their share is growing daily. However, the federal government was seen as being in a position to coordinate the process of designing the NSDI and putting the physical infrastructure in place for it to effectively function. These roles were accordingly assigned to the FGDC through OMB Circular A-16. Diminishing nonfederal stakeholder input to the process is not an effective strategy for success.

Executive Order 12906 recognized this fact when it said the National Spatial Data Clearinghouse would be "a distributed network of geospatial data producers, managers, and users linked electronically." It is important to note that the qualifier "federal" was not included. The original NSDI concept anticipated construction of a large data warehouse that would contain datasets conforming to a number of standards established for the recognized NSDI data themes. Technology has now advanced to the point that a Web-based set of distributed suppliers rather than a single, massive repository is the best approach. Such a design makes full participation by all suppliers and users through their representatives on the NGCC even more important. The proposed NGAC will not meet the expressed need for comprehensive NSDI management.

The FGDC should return to the original intent for a national body to guide development and operation of the NSDI. The FGDC has been designated as the federal government's leader in NSDI development and operation, but it is not in a position to serve as the nation's leader if, for no other reason, than the simple fact that the federal government is not the primary supplier of spatial data. In addition, the federal government has not been successful in creating the necessary data standards and other NSDI infrastructure components. This failure cannot be traced to a lack of FGDC efforts but a fundamental flaw: an FGDC-led effort does not allow nonfederal stakeholders to perceive themselves as being equal participants, only secondary advisors. A true NGCC charter should replace the proposal for an FGDC advisory council.

Now is the time for the FGDC to create the mechanism for effective joint decision-making by all stakeholders, as embodied in the original NGCC proposal. The URISA Board urges the FGDC to open the process of NSDI governance by creating an organization where all stakeholders are peers, not one where one group is subservient to another. We welcome the NGAC as a first step in creating a *national* council governing the *National* Spatial Data Infrastructure.

Regards,



Ed Wells  
URISA Board of Directors, President  
On behalf of the URISA Board of Directors