



August 25, 2004

Dr. James H. Butler
NOAA Strategic Planning Office
Office of Program Planning and Integration
National Oceanic and Atmospheric Administration
1315 East-West Highway, Room 15755
Silver Spring, MD 20910

Sent via email to: strategic.planning@noaa.gov

Dear Dr. Butler:

This letter is being sent in response to the request for comments regarding New Priorities for the 21st Century – NOAA’s Strategic Plan updated for FY2005 to FY2010 (the “Strategic Plan”).

These comments are being offered on behalf of the Commercial Weather Services Association (“CWSA”).

CWSA is the trade association for the Commercial Weather Industry. Like most trade associations, it does not claim all companies in the industry as members; but CWSA does have over two-dozen member companies – many recognized names. The Commercial Weather Industry is the only private sector enterprise, which produces weather and related ocean information, services and systems for industry, government and the public. As such, it occupies a unique position in the American weather enterprise. Its companies provide information, services and systems to tens of thousands of businesses, industry and media companies and reach much of the American population and a large international audience with their products and services.

Commerce Secretary Don Evans has said: “Government does not create wealth and prosperity: people do. It is government’s role to create the right conditions in which America’s workers and businesses will flourish.” We agree with this concept and believe that the Strategic Plan should reflect that objective.

CWSA strongly supports improving the way that NOAA acts toward the Commercial Weather Industry and has recently provided significant input to the National Weather Service with regard to policy changes it is considering to the “Policy Statement on the Role of the Private Weather Industry in the National Weather Service” adopted in 1991.

Given the fact that those proposed changes by NOAA/NWS have generated more comments than any other proposed policy in NWS history, it was our expectation that NOAA’s Strategic Plan update, would deal with the vital issues that are under discussion.

This is especially true in light of the fact that the February 2004 Issue of the Bulletin of the American Meteorological Society published an article that contains predictions for a continued shift from government, academic and other jobs in meteorology to the private sector, with private sector jobs constituting more than 50% of those jobs in the American weather enterprise by 2010.

These issues, concerns, and demographic trends should be reflected in NOAA's strategic plan update. While there are some minor references to "the private sector," there is not a single mention of the unique role that the Commercial Weather Industry plays in the American weather enterprise, nor is there reference to the fact that the American weather enterprise, despite debate over methods and policies for improvement, has produced the best weather information system here in the United States, better than any other country in the world.

The section of the Strategic Plan that focuses on society's needs for weather and water information focuses on "how to use [NOAA's] weather, air quality, water and space weather information to improve operational efficiencies, to manage environmental resources and to create a better quality of life." It is disappointing that there is not recognition there that much of what is mentioned, with regard to NOAA's products and services, is already actively served by the Commercial Weather Industry and that what is truly needed here is a plan to develop an appropriate relationship by NOAA that encourages the continued development, for the good of the national economy, of the Commercial Weather Industry.

There is reference to the fact that NOAA plans to expand services to support evolving national needs including those associated with space weather, fresh water and coastal ecosystems and air quality prediction. Again, the Strategic Plan does not address how this will be done and at the same time, depends on the Commercial Weather Industry for the multitude of products and services that it provides.

Under Weather and Water Strategies, there is no reference to the Commercial Weather Industry, but rather it talks in language that does not suggest that NOAA is aware that our industry exists.

In the section involving supporting the nation's commerce for transportation needs, it again refers to NOAA providing information products and services for transportation safety, for increased commerce on roads, rails and waterways, but does not take into account the fact that many such services are already available from the Commercial Weather Industry, and that these services are utilized by hundreds of highway departments and have been for decades.

We would invite NOAA to specifically review the comments that the CWSA provided to the National Weather Service with regard to the *Fair Weather* policy changes and specifically the following bullet points detailed in these comments:

- Recognizing the importance of the Commercial Weather Industry (including broadcast meteorology) and a pledge to encourage its growth.
- Endorsing policies of non-competition with the Commercial Weather Industry.

- Defining a specific mission for NOAA and the National Weather Service.
- Including as part of its strategic planning and policies requirements, for the equal access to data and a level playing field.
- Providing methods to ensure that all NOAA employees adhere to all such policy requirements; and that there be a NOAA and Department of Commerce complaint, appeal and remedy processes relative to NOAA activities.

Under Organizational Excellence and Mission Support in the Strategic Plan, CWSA supports adopting a functional management model that establishes direct lines of accountability, including cost accounting of all of NOAA's services. We believe that it is essential for NOAA to have control over how its funds are spent and that in order to do this, NOAA management must know the duties and cost breakdowns for the various operational tasks performed at NWS WFOs.

CWSA also supports the free, open, and unrestricted access to all Americans of both United States and international data sets, in real time. This could be much more clearly articulated in the Strategic Plan, including reference to the value-added function that the Commercial Weather Industry serves in taking government data sets and making them available to the public.

Under Exercise of Global Leadership, we would like to see the Strategic Plan focus on efforts to open global markets to the Commercial Weather Industry of the United States. Often times the U.S. Commercial Weather Industry is restricted and discriminated against in acquiring international data sets and in pursuing meteorological and oceanographic opportunities in foreign countries.

Finally, with regard to references in Performance Management of managing NOAA to legislative mandates, we would like to see the Strategic Plan endorse initiatives to replace the 1890 Organic Act of the National Weather Service and to develop within the body of the proposed NOAA Organic Act, the concepts mentioned herein.

Thank you for your consideration with respect to these issues.

Very truly yours,

A handwritten signature in black ink, appearing to read 'S. Root', enclosed within a large, loopy oval shape.

Steven A. Root
President

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