

## NCIM Response to Proposed NOAA/NWS Policy Changes

Dear Reader:

The NWS commissioned the National Research Council to develop the ideas contained within the publication, *Fair Weather: Effective Partnerships in Weather and Climate Services*. From this, the NWS has developed a proposed policy entitled, *Policy on Partnerships in the Provision of Weather, Water, Climate and Related Environmental Information*, and has requested feedback on this proposed policy. The National Council of Industrial Meteorologists (NCIM) offers the following opinions on NWS' proposed policy in an effort to provide constructive feedback that will assist the NWS in refining the final policy. NCIM strongly supports the policy of "openness" that the NWS is using to obtain feedback on this draft policy and is grateful for this opportunity to provide feedback.

### 1. Why Critical Policy Boundaries between Normal NWS and Normal Private Sector Activity Are Needed

One of the basic premises of the *Fair Weather* report which is cited by the NWS is:

"It is counterproductive and diversionary to establish detailed and rigid boundaries for each sector outlining who can do what and with which tools. Instead, efforts should focus on improving the processes by which the public and private providers of weather services interact. Improving these processes would also help alleviate the misunderstanding and suspicion that exists between some members of the sectors."

and that:

"The NWS should replace its 1991 public-private partnership policy with a policy that defines processes for making decisions on products, technologies, and services, rather than rigidly defining the roles of the NWS and the private sector."

While NCIM agrees that it may be counterproductive to establish "detailed and rigid boundaries", we are concerned by the apparent lack of guidelines on the appropriate roles of each sector. Although probably well-intended, removing clear lines of distinction between the normal activities of the NWS and the private sector could have the negative effect of encouraging vast, unmitigated, and unregulated expansion by the NWS. Further, the needless anxiety between NWS employees and private sector meteorologists or companies as to what is acceptable will likely result in conflicts that are counterproductive to the profession of meteorology as a whole. How can one operate with no boundaries? We are a nation of laws, and even though the NWS is bound by many government agency laws or mandates, such as OMB A-130, the lack of distinction between sectors may cause harm to the profession of meteorology as a whole.

For example, the longstanding, explicit partnership between the NWS and broadcast meteorology to disseminate weather watches and warnings is not cited in the proposed guidance, yet, this is a primary function of meteorologists both within the government and private sectors. Omitting such a successful and crucial mission for the profession of meteorology reflects negatively upon the profession as a whole to our broad customer base (largely the public) and fails to provide assurance of direct, clear, and timely service to those customers.

## 2. Suggested Insertion of a Clear Policy to Limit Expansion of NWS Services

The new NWS policy, as it is written in draft form, is overly vague. As stated in #1 above, there are no clear dividing lines between what is expected of the NWS and of the commercial weather industry. Although Ed Johnson stated in the recent AMS Webcast that the NWS does not plan to expand its services, language to that effect is missing from the policy. NCIM strongly suggests that clear lines of delineation be added to the policy and that these lines be posted for review before becoming NWS policy.

## 3. Suggested Inclusion of a Formal Procedure for Questioning and Requesting Review of Specific NWS Practices

Further, the NWS should draft a resolution procedure to deal with legitimate concerns of the commercial weather industry (CWI). Mechanisms by which CWI entities can question or enact reviews of NWS practices should be implemented to allow monitored discourse. These mechanisms should be more formal than typical requests for feedback via NWS websites. NWS/NOAA should not always advocate only the NWS perspective by only presenting justifications for existing NWS practices where issues have been raised. Instead, some level of increased NWS understanding and change in NWS policy may occasionally need to be incorporated to make things “right”.

## 4. AMS Is a Good Forum for Unbiased Discussion

The NCIM strongly agrees that the AMS can facilitate “unbiased” discussion on matters that affect the profession of meteorology as a whole. NCIM is already a willing participant in the newly created Ad Hoc Committee on the Weather and Climate Enterprise (John Snow, Chair).

## 5. Active Nurturing by NWS of the Private and Academic Sectors

Private sector growth in meteorology should be nurtured by NWS/NOAA and the private sector should work with NWS/NOAA as a partner. In some cases, the academic sector may also be an appropriate partner. Mechanisms for long term working arrangements should be pursued. NCIM is willing to work together with all sectors and user groups as appropriate.

Proof of the potential for successful and beneficial partnering between the three major sectors can be found in many existing activities. Watch and warning dissemination is one example. Another example is shared monitoring of environmental parameters such as standard sensor monitoring of surface meteorology, remote sensing of precipitation and storms, and buoy monitoring of ocean state. Similarly, all three sectors contribute to the training of new meteorologists for entry into the workforce. And advancement of the science through research and development occurs vigorously in all three sectors.

Cordially,

**John Toohey-Morales, CCM**

President, National Council of Industrial Meteorologists (NCIM)