



Kentucky Statewide Emergency Responder Voice System

Research Report No. 500

Legislative Oversight And Investigations Committee

Kentucky Statewide Emergency Responder Voice System

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Abstract

This report examines the Kentucky Statewide Emergency Responder Voice System (SERVS), a statewide radio system intended to allow communication between first responders. In 2018, Kentucky State Police (KSP) received \$35.1 million to implement the system. Since then, KSP has been appropriated \$216.4 million for SERVS but a targeted end date is still unclear. The Kentucky Field Operations Guide serves as reference material for communications personnel across the state but will need to be updated to reference SERVS's functionality. Generally, the management of SERVS did not conflict with statutes or regulations but managerial decisions resulted in the system taking longer to develop. The project does not appear to have a master plan, which is not required by statute but would likely be useful. About half of appropriations have not been expended, with most funds going toward mobile equipment and relatively little going to land acquisition. One vendor has received \$72 million of funds allocated (66 percent). SERVS expenditures have been issued through state-wide contracts that were competitively bid at their creation, but use of this spending has not gone through oversight mechanisms and there may have been benefits to opening bidding specifically for SERVS. Of those payments to Motorola, approximately \$45 million may have been issued late. Depiction of project needs and progress have been unclear. Budget requests have not indicated this project would require more funds in the future and maps provided to legislators have been unclear about which sites would require more effort in the future. Land acquisition has been the most difficult step for SERVS but multiple years passed before additional efforts were taken to acquire land. The Division of Real Properties in the Finance and Administration Cabinet did not issue a contract for land acquisition until 2024 and KSP did not appear to ask for assistance. A survey of first responder agencies found that many were interested in a system like SERVS but few had active communications with KSP. This report contains seven recommendations and three matters for legislative consideration.

Foreword

Legislative Oversight and Investigations Committee staff appreciate all those who provided assistance with this report. Staff from Kentucky State Police provided time for interviews with staff working on the statewide radio system. Within the Finance and Administration Cabinet, staff from the Office of Procurement Services and the Division of Real Properties provided information on their roles in the procurement process. We would like to thank the representatives from local law enforcement, fire departments, and emergency medical services across the state who participated in a survey, as well as the professional organizations that facilitated the survey's distribution. Their insights provided valuable context for understanding how the Statewide Emergency Responder Voice System (SERVS) is perceived and implemented at the local level. The survey was distributed to agency representatives through the Kentucky State Fraternal Order of Police, the Kentucky Association of Chiefs of Police, the Kentucky Firefighter's Association, the Kentucky Sheriffs Association, the Kentucky Fire Commission, and the Kentucky Board of Emergency Medical Services.

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Frankfort, Kentucky
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Summary

On February 3, 2025, the Legislative Oversight and Investigations Committee (LOIC) directed staff to examine the planning, implementation, and oversight of the Statewide Emergency Responder Voice System (SERVS). SERVS is intended to replace the Kentucky State Police's (KSP) legacy VHF radio network with a modern, interoperable Project 25 (P25) digital trunked radio system. The project's objectives include improving emergency responder communications, expanding coverage across the state, and ensuring greater reliability during critical incidents. The project was originally funded in 2018 and has received additional funding in each budget session. About half of appropriated funds have been spent as of the end of FY 2025.

This study reviewed SERVS from its inception through mid-2025, focusing on procurement processes, land acquisition, funding prioritization, and interagency coordination among the Kentucky State Police, the Office of Procurement Services, and the Division of Real Properties. The report identifies management challenges, documentation gaps, and potential risks to project transparency, cost-effectiveness, and timely completion.

Major Objectives

The study had nine major objectives:

- Assess the progress of SERVS.
- Evaluate financial oversight and budget utilization.
- Analyze funding priorities and expenditures among SERVS project components.
- Determine compliance with relevant statutes, regulations, and technical standards.
- Assess the planning, procurement, and contracting processes used for SERVS.
- Evaluate coordination among the Kentucky State Police, Office of Procurement Services, and the Division of Real Properties.
- Identify barriers that have delayed tower-site acquisition and construction.
- Examine alignment between SERVS and local first responder groups and systems.
- Identify internal control weaknesses and areas for improvement.

Major Conclusions

This study has 10 major conclusions:

- KSP does not appear to have violated any statutes or regulations but additional planning would have been beneficial for the project.
- KSP was unable to produce planning documents for SERVS. While a master plan is not required, large-scale infrastructure projects benefit from advance planning.

- As of the end of FY 2025, \$107.2 million (49.5 percent) of allocated funds remain unspent.^a A similar pattern exists for FY 2020 to FY 2024, where 27.4 percent (FY 2022) to 72.9 percent (FY 2021) of appropriated funds remain unspent.
- Information provided to the General Assembly and to LOIC has been unclear about the scope and progress of SERVS. In particular, the maps provided to staff and presented to the committee during meetings are not clear and should not be considered representative of project milestones without significant additional information and clarification.
- Acquisition of real property was identified as a significant barrier for the project. However, a contract to assist with land acquisition was not established until October 2024 despite known lengthy legal and titling processes.
- There appears to be confusion over responsibility for the project. KSP representatives have indicated KSP has little influence in contracting beyond providing a scope of work, and that the Finance and Administration Cabinet is responsible for procurement. Multiple Finance and Administration Cabinet procurement officials indicated that the cabinet only supports user agencies, and that KSP would be responsible for the project and record keeping. When KSP representatives were asked to provide documentation, they directed LOIC staff to the Finance Cabinet.
- Extensive use of master agreements has resulted in minimal oversight and review of expenditures. It has also allowed Motorola to receive approximately \$72 million in funds without competition. Although the original multi-state contract for Motorola was competitively awarded, Kentucky heavily used the contract later with marginal supporting documentation. Optimally, there would have been a robust determination and findings that demonstrated how a master agreement was preferable to a competitive negotiation for the SERVS project. Master agreements are a useful tool and are competitively negotiated when initially created, but it is not clear they were meant to be used for large-scale infrastructure projects with specific requirements and technical challenges.
- A sample of SERVS invoices found that bills for Motorola may have been paid late. Motorola representatives did not share any concerns when contacted by LOIC staff. The Justice and Public Safety Cabinet and the Finance and Administration Cabinet indicated that payments were made on time, but there is insufficient documentation in the accounting system to verify that statement.
- Despite expecting first responders to be users of SERVS, communication with first responders beyond KSP appears to be limited. In a survey of first responder organizations, only about a quarter were aware of SERVS. Some respondents indicated they bought radios to use with SERVS because they thought SERVS would be available for use.
- A survey of first responders found that a system like SERVS would be useful to them. Some respondents familiar with SERVS were eager to use the system.

^a The Justice and Public Safety Cabinet and the Finance and Administration Cabinet confirmed that, as of October 28, 2025, approximately 61.0 percent of project funds have been expended.

Recommendations And Matters For Legislative Consideration

The Kentucky Field Operations Guide serves as a reference manual for communications personnel supporting emergency responses and events across the commonwealth. It includes the responsibilities of agencies during mutual-aid operations, the prioritization of interoperable resources, and the standardized uses of mutual-aid channels. The guide does not contain material regarding SERVVS and would need to be updated to prevent communications personnel from relying on outdated information.

Recommendation 2.1

The Kentucky State Police should ensure that the Kentucky Field Operations Guide is reviewed and updated to reflect the capabilities and requirements of the new Statewide Emergency Responder Voice System. The guide should account for features such as 700/800 MHz P25 trunked infrastructure, statewide talkgroup planning, encryption standards, and geo-redundant system cores.

Since 2018, Motorola has received \$72 million in allocated funds (66 percent of total expenditures) for work on SERVVS. As the greatest provider of services for SERVVS, Motorola invoices were reviewed for outstanding issues. While all 21 payments matched invoices, 13 payments appeared to be at least 35 days past the invoice date. KRS 45.454 states that the commonwealth should pay an interest penalty when amounts are unpaid 30 working days past the receipt of the goods, services, or vendor's invoice. Motorola staff did not indicate any frustration with KSP but late payments may harm the reputation of the commonwealth. The Justice and Public Safety Cabinet and the Finance and Administration Cabinet stated the payments were not late because the invoices were used to confirm prices, but there was insufficient documentation in the accounting system to verify that assertion.

Recommendation 3.1

Kentucky State Police should review its payment processing system and establish any internal controls necessary to ensure payments are made on time.

Requests for funding for SERVVS have been inconsistent. In multiple instances, capital plans requested funding and then indicated the funding would be sufficient for the next 10 years. While this phrasing may have referred to specific phases of SERVVS, it may have misled legislators into thinking additional funding would not be needed. KSP representatives have indicated that SERVVS would require additional funding in the future for maintenance and upgrades, so the language similar to the previous vague text may be insufficient. Additional information from KSP regarding progress and needs of the system may help legislators decide how to fund the system and how to guide the development of SERVVS.

Matter For Legislative Consideration 3.A

The General Assembly may wish to consider adding additional requirements as a condition for Kentucky State Police to receive funding for the Statewide Emergency Responder Voice System.

KSP's accounting of SERVS appropriations and expenditures appears to be accurate, but the presentation of information to legislators tends to obscure trends in funding. Expenditure information provided to the Legislative Oversight and Investigations Committee creates the appearance that phases of SERVS were generally completed in the years that funding was received. In reality, appropriations were not fully spent in the years they were assigned, with work taking longer than expected during some phases. With approximately 49 percent of appropriations remaining unspent, it is also unclear why KSP is requesting additional funding in the next budget cycle and how it will spend the \$107 million that still remains. While KSP submitted details in the 2026-2032 capital project plan, it does not address why more funds are needed when significant funds remain unspent.

In addition, the majority of work was done through preestablished master agreements. Master agreements are a typical agreement that establishes prices for agencies to use in the future, but spending through those contracts will not be reviewed by the Government Contract Review Committee. Having a multi-million-dollar infrastructure project entirely done through master agreements results in lower oversight and prevents potential negotiations that can be associated with larger projects.

Between large amounts of unused funds, long horizons for spending, lower levels of oversight, reduced amounts of negotiation, and long delays in providing financial data to Legislative Oversight staff, there may be a benefit in having a deeper financial analysis done by financial specialists. There is no indication that funds were maliciously abused but a difficult procurement process opens opportunities for funds to be inadvertently wasted or incorrectly tracked.

Matter For Legislative Consideration 3.B

The General Assembly may wish to engage the Auditor of Public Accounts to conduct a full financial audit of the SERVS project, including a compilation of project spending that ties together appropriations, procurement actions, and payments.

Land acquisition has been a significant obstacle for SERVS but a contract to assist with acquisition was not issued until nearly six years after the start of the project. KSP appears to have initially concentrated on western Kentucky, where deployment was easier. Eastern Kentucky's mountainous terrain will make future development more difficult and need additional time. Early engagement could have prepared for scenarios like having a large number of small, geographically dispersed or remote tower sites.

Recommendation 3.2

The Finance and Administration Cabinet should promulgate administrative regulations under the Model Procurement Code to require agencies to formally consult the Division of Real Properties at the outset of any capital project that involves land acquisition outside of typical office building projects.

While the Division of Real Properties has been actively assisting with property acquisition, it waited a significant time to issue a contract. The director of Real Properties was unsure when

KSP first contacted the office but estimated the two began working together in 2020. The contract was made effective on October 15, 2024. Committee testimony indicated that KSP did not have the skills to acquire property and that Real Properties had to learn to acquire property for the specific requirements of the SERVS project.

Recommendation 3.3

When initially contacted on future projects, the Division of Real Properties should consider whether the project will exceed its capacity and require contracted assistance.

While KSP argued that SERVS is too complex to develop comprehensive planning, projects in Minnesota and Pennsylvania were similarly complex and included phased project plans that allowed legislators and the public to assess progress. The lack of a strategic plan increases the risk that financial resources will be underutilized or misaligned and that project delays will go unnoticed. However, there is no formal requirement for a plan.

Matter For Legislative Consideration 3.C

The General Assembly may wish to amend KRS Chapter 45A (Kentucky Model Procurement Code) and related administrative regulations to require that any capital project above a specific appropriation threshold have an approved strategic or master plan before solicitation, award, or use of capital funds. The General Assembly may also wish to require that capital projects that require a plan include an evaluation of potential project risks.

No single authority is charged with maintaining a complete record of SERVS activities, with information scattered across multiple agencies. KSP indicated it met periodically with the Finance and Administration Cabinet to monitor progress but no documentation was provided, so there is no evidence of structured project management. KSP also did not produce a master plan or milestones for a project.

Without project plans or milestones, the SERVS maps provided to the Legislative Oversight Committee have been the main source of information on progress. However, the structure of those maps may introduce more confusion than clarity. These maps do not clearly indicate the type of site needed for radio towers. When some sites require only new radios while others require land acquisition and the construction of towers, there can be a large difference in the amount of effort required to provide radio service in a region. Without complete information on sites completed and sites needed in the future, legislators may not receive a full understanding of SERVS and may come to incorrect conclusions.

Recommendation 3.4

When Kentucky State Police provide updates on SERVS to the General Assembly, it should include a list of sites with information on progress toward procurement or construction along with whether the site was a preexisting state government site or was acquired from a private owner.

KSP indicated it met weekly with the Finance and Administration Cabinet to discuss SERVS. There was no documentation of these meetings but it appears these meetings were insufficient to overcome the land acquisition issue. In theory, the Kentucky Wireless Interoperability Executive Committee could have served as a resource or provided oversight of SERVS. However, it appears to be inactive because its minutes have not been updated since 2018, and the committee did not respond to Legislative Oversight staff requests. The Justice and Public Safety Cabinet indicated that KSP has been in contact with the committee but provided no example documentation to confirm those interactions. Without a way to obtain additional assistance or a group to perform oversight of SERVS, it is possible that KSP will encounter additional roadblocks in the future and not have a way to resolve the issue.

Recommendation 3.5

Kentucky State Police should develop a policy to seek additional help or resources when significant roadblocks prevent progress with SERVS.

Matter For Legislative Consideration 3.D

The General Assembly may wish to consider designating a group to oversee SERVS, such as an existing legislative committee or a group of stakeholders and subject matter experts that could provide advice and resources.

A survey of 160 first responder agencies throughout Kentucky found that 83 percent thought interoperable radio systems, like SERVS, were very or somewhat important. However, only 46 of the 160 respondents were aware of SERVS. Within that group, 12 agencies indicated they were involved in discussions with KSP but 23 agencies wanted to be active participants. SERVS is intended to be used by all first responders in the state. Increasing communications with first responder agencies and getting feedback would increase the likelihood that these agencies will use SERVS.

Recommendation 3.6

As Kentucky State Police expand the SERVS network throughout Kentucky, it should communicate with more first responders to obtain feedback on procedures and generate interest in participating.

Chapter 1

Statewide Emergency Responder Voice System

On February 3, 2025 the Legislative Oversight and Investigations Committee directed staff to review the Statewide Emergency Responder Voice System (SERVS).

On February 3, 2025, the Legislative Oversight and Investigations Committee (LOIC) directed staff to review the Statewide Emergency Responder Voice System (SERVS) as developed by the Kentucky State Police (KSP). LOIC staff were directed to review issues preventing progress, contracts established for SERVS, progress of the system, use of appropriations, and the project's alignment with standards.

Updated First Responder Communication System

SERVS is an effort to modernize emergency communications. It is overseen by the Kentucky State Police and would allow for an interoperable radio system that could be used by all emergency responders in the commonwealth.

SERVS is Kentucky's effort to modernize and unify emergency communications through a Project 25 (P25) digital trunked radio network. Designed to replace the aging UHF conventional system currently used by the Kentucky State Police and integrate with the Kentucky Emergency Warning System (KEWS), SERVS aims to provide a single, interoperable platform for state, local, and regional first responders. The project's goals include improving reliability, coverage, and interoperability across agencies and jurisdictions.

Major Objectives

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- Assess the progress of SERVS.
- Evaluate financial oversight and budget utilization.
- Analyze funding priorities and expenditures among SERVS project components.
- Determine compliance with relevant statutes, regulations, and technical standards.
- Assess the planning, procurement, and contracting processes used for SERVS.
- Evaluate coordination among the Kentucky State Police, Office of Procurement Services, and the Division of Real Properties.
- Identify barriers that have delayed tower-site acquisition and construction.
- Examine alignment between SERVS and local first responder groups and systems.
- Identify internal control weaknesses and areas for improvement.

Methodology

LOIC staff reviewed appropriations and expenditures of SERVS from when SERVS officially received funding from HB 200 RS 2018 to the last expenditures registered for FY 2025.

Appropriation bills and capital project requests were reviewed to determine plans for SERVS. Expenditures were pulled from the statewide accounting system, eMARS, to determine how appropriated funds were spent. KSP and Finance and Administration Cabinet policies were reviewed to determine if SERVS met requirements. Staff from KSP and the Finance Cabinet's Office of Procurement Services and Division of Real Property were interviewed to understand their roles. Construction and property acquisition contracts were reviewed to understand how radio tower sites were acquired and developed.

Significant Scope Limitations

This study had significant data restrictions that limited its scope. Initial requests required almost four months for a response. Interview requests required a month to schedule.

This report encountered significant data restrictions that limited its scope and ability to determine effectiveness of SERVS. Section 9.12 of the Generally Accepted Government Auditing standards states auditors should “report any significant constraints imposed on the audit approach by information limitations or scope impairments, including denials of, or excessive delays in, access to certain records or individuals.”¹ For this study, there were excessive delays in receiving management and financial information and receiving access to staff.

On May 2, 2025, LOIC staff submitted an initial data request to KSP.² Despite multiple follow-up communications, the response was not received until August 20, 2025.³ Executive branch data requests are typically received in 2 to 4 weeks, so this request took three times the typical response time. The resulting information was fairly limited and initially contained incorrect information, which was corrected shortly after. Similarly, LOIC staff requested access to a real property database on August 6, 2025 but had not received it by the writing of this report.⁴

Similar delays occurred when scheduling interviews. Following information that contracting responsibilities for SERVS were primarily associated with the Finance and Administration Cabinet, LOIC staff submitted a request on August 7, 2025 to meet with procurement staff.⁵ By September 16, 2025, the meeting had not been scheduled but was arranged after further communication by an LOIC supervisor.⁶

Major Conclusions

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- KSP does not appear to have violated any statutes or regulations but additional planning would have been beneficial for the project.
- KSP was unable to produce planning documents for SERVS. While a master plan is not required, large-scale infrastructure projects benefit from advance planning.
- As of the end of FY 2025, \$107.2 million (49.5 percent) of allocated funds remain unspent. A similar pattern exists for FY 2020 to FY 2024, where 27.4 percent (FY 2022) to 72.9 percent (FY 2021) of appropriated funds remain unspent.
- Information provided to the General Assembly and to LOIC has been unclear about the scope and progress of SERVS. In particular, the maps provided to staff and presented to the committee during meetings are not clear and should not be considered representative of project milestones without significant additional information and clarification.
- Acquisition of real property was identified as a significant barrier for the project. However, a contract to assist with land acquisition was not established until October 2024 despite known lengthy legal and titling processes.⁷
- There appears to be confusion over responsibility for the project. KSP representatives have indicated KSP has little influence in contracting beyond providing a scope of work, and that the Finance and Administration Cabinet is responsible for procurement. Multiple Finance and Administration Cabinet procurement officials indicated that the cabinet only supports user agencies, and that KSP would be responsible for the project and record keeping. When KSP representatives were asked to provide documentation, they directed LOIC staff to the Finance Cabinet.
- Extensive use of master agreements has resulted in minimal oversight and review of expenditures. It has also allowed Motorola to receive approximately \$72 million in funds without competition. Although the original multi-state contract for Motorola was competitively awarded, Kentucky heavily used the contract later with marginal supporting documentation. Optimally, there would have been a determination that master agreements were more appropriate than a competitive negotiation specifically for SERVS. Master agreements are a useful tool and are competitively negotiated when initially created, but it is not clear they were meant to be used for large-scale infrastructure projects with specific requirements and technical challenges.

- A sample of SERVS invoices found bills for Motorola may have been paid late. However, Motorola representatives did not share any concerns when contacted by LOIC staff. The Justice and Public Safety Cabinet and the Finance and Administration Cabinet indicated that payments were made on time, but there is insufficient documentation in the accounting system to verify the statement.
- Despite expecting first responders to be users of SERVS, communication with first responders beyond KSP appears to be limited. In a survey of first responder organizations, only about a quarter were aware of SERVS. Some respondents indicated they bought radios to use with SERVS because they thought SERVS would be available for use.
- A survey of first responders found that a system like SERVS would be useful to them. Some respondents familiar with SERVS were eager to use the system.

Structure Of This Report

Chapter 2 provides background on communications standards and the history of SERVS. It contains one recommendation

Chapter 2 provides information on SERVS. This includes the history of SERVS, its goals, the P25 communication standard, and implementation of similar projects in other states. It contains one recommendation for KSP.

Chapter 3 outlines financial and managerial issues associated with SERVS. It contains six recommendations and three matters for legislative consideration.

Chapter 3 outlines identified financial and managerial issues associated with SERVS. Large portions of appropriated funds remain unobligated or unspent, and much of the spending that has occurred has been concentrated among a few vendors through existing master agreements, limiting transparency and accountability. Key managerial issues include delayed and complicated land acquisition for tower sites; fragmented oversight between the Kentucky State Police, the Office of Procurement Services, and the Division of Real Properties; and the absence of a comprehensive project plan with measurable milestones, which have all contributed to delays in project progress and completion. The chapter contains six recommendations for KSP and the Finance and Administration Cabinet and three matters for legislative consideration.

Chapter 2

Kentucky Statewide Emergency Responder Voice System Background

The Kentucky Statewide Emergency Responder Voice System (SERVS) is Kentucky's solution to disparate first responder radio technology throughout the commonwealth.

The Kentucky Statewide Emergency Responder Voice System (SERVS) is designed to be Kentucky's solution to different first responder radio technology throughout the commonwealth. A national effort began more than 20 years ago to connect the country's first responders in the event of multi-jurisdictional emergency. Since then, at least 37 states have participated in the bottom-to-top approach for national interoperability by building their own statewide systems which can in turn hook into a larger, inter-state grid as needed.

Kentucky State Police (KSP) took over the planning and building of SERVS when upgrades to its own radio system became the solution to a lack of a statewide system.

Although Kentucky was among the first to assemble a team to oversee interoperability efforts, it is one of the last states without a statewide interoperable system. The Kentucky State Police (KSP) took over the planning and building of the project when the end-of-life upgrade to its own radio system became the solution to Kentucky's lack of a statewide system. KSP planned to upgrade their equipment and infrastructure while adding to the existing framework to make SERVS. Since KSP started the project in 2018, they have replaced mobile and portable radios for agency personnel, upgraded hardware and infrastructure around towers, and built four new towers. This chapter contains one recommendation for KSP to update a communications guide to account for SERVS.

Project 25 And Emergency Radio Standardization

Project 25 (P25) radio standards were created to align interoperable communication efforts. Use of these standards are not mandatory outside of receiving federal grants.

Advancements to radio technology at the end of the 20th century created the need for consistent interoperability standards. The Federal Communication Commission (FCC) adopted the Association of Public-Safety Communications Officials (APCO) and the National Association of State Telecommunications Directors (NASTD)'s standard known as Project 25. This group joins stakeholders and industry leaders to formulate user-friendly standards for public safety. The purpose of establishing these standards was to align interoperable communication efforts and guide agencies toward one system, but it is not mandatory aside from being necessary to receive federal grants.

Project 25 History

The Federal Communications Commission (FCC) designated a portion of the radio spectrum to interoperable communications, with the intent of establishing an interoperable radio standard.

In the 1980s and 1990s, the Federal Communications Commission mandated a migration of radio usage to narrow band frequency to make room for increasing radio traffic. The FCC also allocated the 700 MHz spectrum to public safety use since the higher frequency of the waves can pierce buildings.⁸ The FCC then designated a portion of this public safety spectrum to interoperable communications, with the intention of eventually establishing an interoperable radio standard.⁹

Before the P25 standards, agencies purchased equipment that was not necessarily capable of collaboration with other agencies.

In 1990, APCO and NASTD along with other federal and local agencies decided that national interoperability efforts required organization.^a This led to the creation of Project 25.^b The purpose of the project was to unify public safety radio communications and establish seamless connectivity across multiple agencies during emergencies. Before these standards, agencies purchased equipment that was compatible within their organization but was not necessarily capable of collaboration with other agencies.¹⁰

To establish P25 Standards, APCO and NASTD formed the Project 25 Steering Committee, which connects Project 25 members with the Telecommunications Industry Association (TIA), the agency that authors the technical standards as directed by the stakeholders. The collection of standards, known as the TIA-102, details the Project 25 specifications and is accredited through the American National Standards Institute which endorses voluntary standards across various industries.¹¹

P25 Standards

SERVS follows the P25 standards. It is a trunking system that automatically diverts users into talkgroups when they join a multi-agency response.

A Project 25 system can be composed of several interfaces, the standards of which are defined under TIA-102. The standards determine how a P25 system transmits data for voice services, data services, supplementary data services, security services, and location services. Interfaces act as a link between different parts of a system and allow P25 technology from different vendors to become compatible.¹² Due to the customizable and voluntary nature of P25, not every system includes every standardized interface.¹³ There are eight current interfaces defined by the TIA-102. SERVS is a Timed-Division Multiple Access Common Air Interface, technically known as P25 Phase II, which is a trunking system that is compatible with other P25 equipment but not

^a The APCO is the oldest public first responder communications group and the NASTD is a technology advocacy group for state governments.

^b Also known as the APCO/NASTD/FED Agreement.

conventional equipment. Conventional radio systems require the user to manually sync to the same channels as the receiving party.¹⁴ Conversely, a trunked system automatically diverts users onto channels after they select a talkgroup to join. Trunking can be crucial in an emergency situation since the dispatch mechanism is automatic and the frequency-efficient nature of the technology allows for more voice traffic.¹⁵

Federal Relationship With Project 25

The FCC adopted P25 as its interoperability standard in 2001.

Following the terrorist attacks on September 11, 2001, the Wireless Public Safety Interoperable Communications or Project SAFECOM was established as part of President George W. Bush's E-Government Strategy to usher the United States towards interoperability.¹⁶ The FCC adopted Project 25 as its interoperability standard in 2001 and SAFECOM was organized to establish guidelines and policy for the federal Project 25 initiative, as well as provide support and education to state and local authorities as they launch interoperable systems.¹⁷

SAFECOM's membership consists of stakeholders; first responder representatives from all levels of state, local, tribal, and territorial governments; and elected officials with the goal of making interoperability a collaborative effort.¹⁸ While SAFECOM adopted Project 25 as the United States' interoperability standard, it is not required for agencies to adhere to the standards when upgrading their technology. Instead, DHS communication grants require agencies purchase P25 equipment to incentivize implementation.¹⁹

Federal Grants

The Department of Homeland Security adopted the P25 standards as a major requirement for certain telecommunication grants. State, local, tribal, or territorial agencies can apply for these grants to purchase radios and radio equipment, and the materials must be approved before the money is awarded for the project.²⁰

In 2006, Congress mandated that the Department of Homeland Security develop a national emergency communications plan and follow a state developed plan that would lead to interoperability.

In 2006, Congress amended the Homeland Security Act to mandate that the Department of Homeland Security develop a National Emergency Communications Plan and to require DHS interoperability grant recipients to adhere to the guidelines within the plan.²¹ This mandate also required agencies to follow their respective state's Statewide Communications and Interoperability Plan (SCIP). The SCIP was to be approved by SAFECOM and would provide a customized and dynamic roadmap for individual states' paths to interoperability.²²

Previously, grant approval was accomplished through statewide interoperability oversight groups like the Kentucky Wireless Interoperability Executive Committee (KWIEC). A 2007 Government Accountability Office review found this process was confusing and ineffective due to the absence of clear standards, which resulted in manufacturers producing incompatible equipment that they believed was interoperable.²³

In response, DHS established the Compliance Assessment Program which consists of a series of lab-based testing. Through this voluntary program, manufacturers can submit their equipment through rigorous testing to confirm P25 standard compliance. If the technology passes the tests, the manufacturer creates a declaration of compliance which is added to DHS's list of approved equipment. Agencies intending to use federal grants for Land Mobile Radio (LMR) purchases must choose radios from this list.²⁴

Statewide Interoperability Coordinators oversee interoperability coordination. Kentucky's coordinator serves with KSP.

Statewide Interoperability Coordinators (SWICs) oversee interoperability coordination in their own states and support agencies as they make communications decisions and identify communications grants.^c They assist with the National Emergency Communications Plan (NECP) and ensure local plans align with their state's Statewide Communication Interoperability Plan (SCIP).²⁵

KSP Radio System Technical Information

KSP operates a P25 radio system first deployed in the 2000s. The network uses the Kentucky Emergency Warning System, which has more than one hundred tower sites across the state.

The Kentucky State Police (KSP) currently operate on a Project 25 (P25) digital conventional UHF radio system that was first deployed in the early 2000s.²⁶ The system is multicast in design, with each KSP Post transmitting across multiple UHF tower sites to maintain regional coverage. This network rides on the Kentucky Emergency Warning System (KEWS), a statewide microwave backbone with more than one hundred tower sites, which serves as the transport layer for state public safety communications.²⁷

KSP administers mutual-aid radio channels, which are governed by memoranda of understanding.

To ensure interoperability with local and regional responders, KSP also administers statewide mutual-aid conventional channels across VHF, UHF, and 800 MHz. These channels, governed by memoranda of understanding with participating agencies, can be patched by KSP dispatch to provide incident support when needed.²⁸

^c Kentucky's SWIC serves with KSP and has been responsible for managing SERVVS.

The Kentucky Field Operations Guide is the state reference manual for communications personnel. It outlines the principles of interoperable communications in Kentucky.

Kentucky Field Operations Guide. The Kentucky Field Operations Guide (KY-FOG) serves as a reference manual for communications personnel supporting emergency response and planned events across the commonwealth. The guide consolidates procedures, checklists, and technical data to ensure interoperability among agencies. It draws heavily from the Statewide Communications Interoperability Plan and provides practical tools for the Incident Command System, such as role descriptions for Communications Unit Leaders and templates for radio communications planning.²⁹

KY-FOG outlines the common principles of interoperable communications in Kentucky. These include the responsibilities of agencies during mutual-aid operations, the prioritization of interoperable resources, and the standardized use of VHF, UHF, and 800 MHz mutual-aid channels.³⁰ In addition to explaining how agencies can request and deploy communications assets, the guide offers forms and worksheets to support tactical planning, such as radio requirement sheets and incident communications plans.³¹

The Field Operations Guide predates SERVS. While the guide provides foundational guidance, it does not represent the new processes for SERVS. If it is not updated, communications personnel may rely on outdated information.

While comprehensive in its treatment of legacy systems, KY-FOG predates Kentucky's current push to modernize its statewide public safety communications infrastructure. The SERVS project represents a technological leap beyond the UHF conventional systems that KSP has historically relied upon. SERVS is designed to deliver a fully trunked, P25-compliant network operating primarily in the 700 MHz band.³² Its rollout includes the replacement of subscriber radios, installation of in-car repeaters, deployment of new dispatch consoles, and the construction of a geo-redundant core to provide resiliency across the system.³³

Despite these advancements, the KY-FOG continues to provide foundational guidance during the transition. Its emphasis on standardized procedures, channel planning, and interoperable mutual-aid operations ensures that agencies can continue working together effectively, even as legacy and modern systems operate in parallel. The guide's Incident Command System checklists and planning tools remain valuable for training, exercises, and real-world incident response, helping maintain continuity while new infrastructure comes online.³⁴ At the same time, SERVS highlights the need for KY-FOG to be updated so that it reflects the technical realities of trunked digital systems, encrypted communications, and new statewide talkgroup structures. Without such updates, communications personnel risk relying on outdated information that does not account for the capabilities and limitations of the modernized network.³⁵ After receiving a draft of this report, the

Justice and Public Safety Cabinet uploaded a December 2024 version of the guide.³⁶

Recommendation 2.1

Recommendation 2.1

The Kentucky State Police should ensure that the Kentucky Field Operations Guide is reviewed and updated to reflect the capabilities and requirements of the new Statewide Emergency Responder Voice System. The guide should account for features such as 700/800 MHz P25 trunked infrastructure, statewide talkgroup planning, encryption standards, and georedundant system cores.

Interoperability In Kentucky

Kentucky's state level communications partner with the federal government is the Kentucky Wireless Interoperability Executive Committee (KWIEC). It was established in 2003 to address interoperability issues.

Kentucky's state-level SAFECOM partner is the Kentucky Wireless Interoperability Executive Committee (KWIEC). The General Assembly established KRS 42.734 in 2003, which created KWIEC.³⁷ The purpose of this committee was to address interoperability issues that are unique to Kentucky by advising and making recommendations to the Executive Director of the Commonwealth Office of Technology (COT) regarding strategic wireless initiatives. The General Assembly created the KWIEC in response to SAFECOM's initiative to provide interoperability among disparate first responder agencies via state governed interoperability groups. These groups were created to establish a cohesive federal communication standard in accordance with SAFECOM's goals by tasking states with the construction of their individual communication systems and infrastructure that could become interoperable with other states' systems in instances of widespread emergency.³⁸ KWIEC's responsibilities include

- setting standards for and reviewing proposed state and local communication system upgrades;
- annual reporting on the status of Kentucky's interoperability to the Interim Joint Committee on Veterans, Military Affairs, and Public Protection and the Interim Joint Committee on State Government;^d
- providing a setting in which appointed individuals representing relevant agencies can collaborate to bring about and recommend the best standards for Kentucky's public safety communications; and

^d When this statute was implemented, the Interim Joint Committee on Veterans, Military Affairs, and Public Protection was named the Interim Joint Committee on Seniors, Veterans, Military Affairs, and Public Protections.

- developing and updating the Statewide Communication Interoperability Plan (SCIP) as goals are accomplished and new ones arise.³⁹

KWIEC’s status is unclear. It ceased publishing meeting minutes after August 2018. Legislative Oversight staff reached out to KWIEC on August 12, 2025, and received no response as of October 10, 2025.

The current statute administratively situates the KWIEC within the Commonwealth Office of Technology and dictates a composition of 20 committee members who hold their position by virtue of their office or who are gubernatorially appointed for 2-year terms.⁴⁰ Despite still being in statute, the current status of the KWIEC is unknown. KWIEC ceased publishing minutes after August 2018. Additionally, LOIC staff reached out to the group via the contact box on their website on August 12, 2025, and received no response.

Funding For The Kentucky Statewide Emergency Responder Voice System

SERVS has been appropriated \$216.4 million as of FY 2026. The Justice and Public Safety Cabinet has requested an additional \$107.4 million to finish the project.

The General Assembly has funded the creation of a P25-compliant, statewide, interoperable radio network for first responders. As of FY 2026, SERVS has been appropriated \$216.4 million. The Justice and Public Safety Cabinet has requested an additional \$107.4 million to finish the project.

SERVS Funding

SERVS first received funding in 2018 as part of House Bill 200.⁴¹ This bill allocated \$35,100,000 toward Phase I of replacing Kentucky’s emergency radio system. Each budget session following 2018, SERVS received subsequent funding in varying amounts.⁴² Table 2.1 details the funding allocated in each of those budget years.

**Table 2.1
 Kentucky State Police Funding Requests For SERVS
 2018 To 2024, 2026 Budget Appropriations**

Budget Bill	Biennium	Appropriations	Phase Funded
HB 200 RS 2018	2018-2020	\$35,100,000	Phase I
HB 352 RS 2020	2020-2022	52,450,000	Phase II
HB 1 RS 2022	2022-2024	80,909,000	Phase III
HB 6 RS 2024	2024-2026	47,900,000	N/A
2026 capital request	2027-2028	107,427,000	Closeout

Note: SERVS = Statewide Emergency Responder Voice System. N/A = phase not specified in bill. Kentucky State Police refer to it as Phase IIIA in future documents.

Sources: HB 200 RS 2018, HB 352 RS 2020, HB 1 RS 2022, and HB 6 RS 2024; Kentucky Justice and Public Safety Cabinet. “2026 – 2032 Capital Planning System Reports.” Presented at Capital Planning Advisory Board. Frankfort, May 21, 2025. Testimony.

Each budget bill also indicates which phase of the Emergency Radio System Replacement project the awarded bond funds are intended to be used on. The most recent budget bill does not have that language, however. To date, the Emergency Radio System Replacement project has been awarded \$216,359,000 in bond funds.

In 2024, HB 6 authorized KSP to directly acquire any land required for tower sites related to the SERVS or the Kentucky Emergency Warning System.

In 2024, the General Assembly passed House Bill 6 which also authorized KSP to directly acquire any land required for tower sites related to the Kentucky Emergency Warning System or the Emergency Radio System Replacement project.

Kentucky SERVS

In 2015, KSP assumed responsibility for the statewide radio system when its own system required updating.

Kentucky's early solution to interoperability was the mutual aid program. This was a temporary fix while KWIEC agreed on an approach to build a statewide system. In 2015, KSP assumed responsibility for the project when its own system required upgrading. SERVS would replace KSP's legacy statewide system and incorporate state assets like the KEWS network.

Scope And Goals

With SERVS not being completed, a mutual aid program was organized in the interim. It requires three separate channels that can be used after signing a memorandum of understanding. KWIEC first made a statewide interoperable system a goal in January 2007.

Despite being involved in interoperability planning since 2003 with the inception of the KWIEC, Kentucky has not completed its own statewide system. A mutual aid program was organized in the interim, requiring three separate channels with which first responders could be patched together regardless of disparate technology after signing a memorandum of understanding.⁴³ The state received \$724,000 from the Kentucky Office of Homeland Security (OHS) to fund the Mutual Aid program which was not a permanent solution to the interoperability issue.⁴⁴ The KWIEC first made planning for a statewide voice interoperable system a committee goal in January 2007.⁴⁵ The cost and conflicting opinions concerning how to go about constructing this massive system delayed Kentucky's statewide system.⁴⁶

In 2015, KSP proposed a statewide trunked system using the P25 standard.

In 2015, KSP proposed a statewide trunked P25 system once it was clear their conventional P25 450 MHz UHF network was quickly approaching the end of its life. KWIEC decided that this was an opportunity to build out a trunked statewide interoperable system that would be available to any of Kentucky's public safety agencies. This new project, now known as SERVS, would utilize the KEWS network as KSP's previous system had, but would

require the construction of additional towers to supplement the existing coverage.^{47 e}

SERVS was broken into phases, which included purchases of radios and computer cores, upgrades of tower sites, construction of sites, and acquisition of real property.

Due to the magnitude of the project, SERVS was broken into phases that were funded during different budget cycles from 2018 to present. Figure 2.A presents a summary of money allocated for each phase during Regular Sessions 2018–2024, a brief description of each phase, and a list of what the project managers reportedly purchased and planned during these timeframes. The last phase, referred to as the Closeout Phase, includes projected budget requests and plans for the 2026 Regular Session.

Most funds requested for SERVS were for the development of existing sites or the acquisition and construction of new sites. Existing sites were those with towers, either through the KEWS network or leases with tower owners to install radio equipment. For example, KSP were able to repurpose a National Guard tower at the Wendell H. Ford Regional Training Center.⁴⁸ New sites required site identification, property acquisition, right-of-way agreements, equipment for the towers, and construction.

Individual budget requests indicate the proposed number of sites but there is not a total number of expected sites. The total number of sites may be difficult to estimate until closer to the end of the project. If KSP's preferred site for a location cannot be acquired, it may need to shift tower positions and consider alternative sites.⁴⁹ Having an updated count of total sites, including counts of existing and new sites, would have assisted legislators with understanding the scope and progress of the project.

^e The original digital KSP system utilized 127 KEWS tower sites.

Figure 2.A
Phases And Summary Of Budget Expenses For SERVS
By Regular Session Years 2018 To 2026

Phase I	
RS 2018 \$35,100,000	Development of SERVS tower sites and construction at KSP Posts 1 and 2; Phases 1A, 1B, and 1C
Phase IA, 2018 (Completed)	
<ul style="list-style-type: none"> • Purchase of 690 mobile radios • Purchase of 1,200 portable radios 	
Phase IB, 2019 (Completed)	
<ul style="list-style-type: none"> • Salaries and expenses for 70 contracted radio dispatch positions • Purchase and installation of two radio cores at Frankfort and Elizabethtown 	
Phase IC, 2020	
<ul style="list-style-type: none"> • Upgrade of 18 tower sites (antennas, cabling, DC power plants) • Construction (structural improvements, generator installations, equipment shelter installations/replacements, site acquisition/construction) 	
Phase II (Ongoing)	
RS 2020 \$52,450,00	Development of SERVS tower sites and construction at KSP Posts 3, 4, 5, 6, 7, 12, 15, and 16
<ul style="list-style-type: none"> • Equipment installations at 47 existing sites • Acquisition and construction of 17 tower sites (ongoing) • Structural improvements to existing sites • Generator installations to existing sites • Equipment shelter installations/replacements to existing sites 	
Phase III (Ongoing)	
RS 2022 \$80,909,000	Replacement of KEWS networking equipment and replacement of microwave infrastructure

Phase III (Continued)

- Replacement of network switches
- Router installations at 130 sites
- 57 additional router installations upon construction of new sites
- 7 router installations in conjunction with microwave hardware replacement

- 56 sites currently upgraded
- 76 additional sites to be completed by the end of 2026
- 60 upgrades to coincide with new site construction

Phase IIIA (Ongoing)

RS 2024

\$47,900,000

Upgrade existing tower sites and construction of new SERVS tower sites in Eastern Kentucky

- Purchase and installation of two additional radio cores in Frankfort and Hazard
- New radio infrastructure for 24 existing sites to be completed by end of 2026
- DC power plants for 24 existing sites to be completed by end of 2026
- Radio infrastructure and DC power plants for 18 sites to coincide with new site construction
- Structural improvements of towers, generator installations, and equipment shelter installations/replacements

Closeout Phase

RS 2026

**Requested
 \$107,427,000**

Progress on existing sites and construction of new SERVS tower sites in Eastern Kentucky

- Construction of 25 tower sites (\$2,010,000 each)
- Motorola radio installation at 25 new sites
- Motorola radio installation at 16 existing sites
- Contracted salaries and expenses for 5 employees

Note: SERVS stands for Statewide Emergency Responder Voice System. “Existing” sites refer to towers that are already constructed and only require new radio equipment while new sites require acquisition of land and construction.

Sources: Kentucky. Justice and Public Safety Cabinet. “2026-2032 Capital Plan Proposed Capital Project.” June 27, 2025; Kentucky State Police. “Emergency Radio System Replacement Executive Summary.” Presented at the November 16, 2021 meeting of the Budget Review Subcommittee on Justice and Judiciary. Web.

SERVS Compared To Other States' Programs

As of 2022, there are at least 42 states with P25 statewide systems.

As of 2022, there are at least 42 states with P25-compatible statewide systems.⁵⁰ While each state presents its own unique set of challenges, most other states either have implemented or are actively developing their own statewide emergency radio system.

Many states have already allowed emergency responders to use their systems. Examples can be seen in states like Ohio, Minnesota, and Utah.

While radio coverage varies, many states' systems are already accessible to the emergency responders who apply to be certified as a user. For example, Ohio's Multi-Agency Radio Communication System (MARCS) is a 700/800 MHz, trunked radio network.⁵¹ Not only does this system operate within Ohio at 99.71% aggregate voice coverage, it also operates within a ten-mile radius outside of Ohio. State agencies that wish to become MARCS subscribers may do so by reviewing and submitting an application with the Ohio Department of Administrative Services.⁵²

Other states have opened their system to multiple state agencies and have an application process. For example, Minnesota has plans with differing levels of participation available to its state agencies.⁵³ Agencies in Minnesota can enter into full participation plans where the agency is fully integrated into that system and use it for primary voice communications. The limited participation plan offers a temporary solution for entities as they migrate from legacy radio systems to the new system. The other plan Minnesota offers is an "interoperability participation" plan. This allows outside entities to gain access to the Allied Radio Matrix for Emergency Response (ARMER) system via subscriber equipment. Those entities include federal entities working in Minnesota, or emergency responders from neighboring states that may need temporary access to ARMER, but not full-time access.⁵⁴

Other states have developed temporary solution to gaps in coverage that may exist during emergency conditions. Ohio's MARCS system also utilizes Towers on Wheels (TOWs) for incidents within Ohio that require interoperable communications.⁵⁵ These TOWs are 80-foot, diesel-operated towers that can be self-sufficient for 2-3 days. They can be deployed for large events, or emergencies, increasing the coverage and capacity for the affected areas.

The timelines for developing these systems may differ for each state because each state presents its own unique challenges to implementing a new radio network for first responders. Utah recently entered into a contract with L3Harris Communications

(L3H) in late June 2021 to provide a new P25 system for the state.⁵⁶ As part of the rollout of the new system, Utah has issued an interactive P25 project timeline with expected completion dates and estimated completion percentages, a P25 site expansion tracker, a P25 final project cutover schedule, and a P25 programming location schedule with exact site locations listed.⁵⁷

Of the statewide systems with known vendors, Motorola appeared to be the most common provider followed by L3Harris.

As mentioned above, Utah contracted with L3H which is one of the vendors that provide services for the development of radio infrastructure. Multiple states use L3H, but Motorola Solutions seems to be the most commonly used vendor based on a sample of states listed in Table 2.2 below.

**Table 2.2
Statewide P25 Radio Systems By Vendor
As Of October 1, 2025**

State - System	Prime Vendor
Colorado – DTRS	Motorola Solutions
Florida – SLERS/SLERS-2	L3Harris
Kansas – KSICS	Motorola Solutions
Iowa – ISICS	Motorola Solutions
Louisiana – LWIN	Motorola Solutions
Maryland – MD FiRST	Motorola Solutions
Minnesota – ARMER	Motorola Solutions
North Carolina – VIPER	Motorola Solutions
Oregon – State Radio Project	Harris*
Pennsylvania – PA-STARNet	Motorola Solutions
South Carolina – Palmetto 800	Motorola Solutions
Wisconsin – WISCOM	Originally EF Johnson; upgraded to L3Harris
Virginia – STARS	Motorola Solutions

*Harris is now known as L3Harris.

Sources: Colorado. *Public Safety Radio System-Wide Business Plan Report*. June 30, 2015. Web; Federal Engineering. “Federal Engineering Wins Contract To Support State Of Florida Implementation Of Statewide Radio System Upgrade.” May 30, 2022. Web; Deb Gruver. “Kansas Gives Motorola \$50 Million Contract, Based On Bids From 1991.” *GovTech*. Mar. 28, 2014. Web; Iowa. Statewide Interoperable Communications System Board. “Report To The Iowa Legislature On The Status Of The Iowa Statewide Interoperable Communications System Board, Calendar Year 2019.” Dec. 12, 2019. Web; Louisiana. Governor’s Office of Homeland Security and Emergency Preparedness. “Louisiana Wireless Information Network Ethernet Upgrade Overview.” nd. Web; Maryland General Assembly. “Analysis Of The FY 2026 Maryland Executive Budget, 2025. FB04 – Department Of Information Technology – Capital.” nd. Web; TUSA Consulting Services II. “Land Mobile Radio Lifecycle Sustainment Final Report.” Dec. 2020. Web; StateTech. “Radio Communication’s Role In An Era Of Climate Instability.” Nov. 5, 2024. Web; Firefighter Nation. “Harris Corporation Awarded \$50 Million Contract By The Oregon Department Of Transportation For Statewide Radio Project.” Sept. 13, 2011. Web; Pennsylvania Statewide Radio Network. “PA-STARNet: Overview And Fact Sheet.” Sept. 1, 2021. Web; South Carolina. Department of Administration. “Palmetto 800.” nd. Web; L3Harris. “L3Harris Wins \$153 Million Contract To Provide Wisconsin Statewide Interoperable Communications.” June 20, 2024. Web; Graham Moomaw. “Virginia Got Just One Bidder For A \$100M+ Radio Project. A Key Legislator Wasn’t Happy About It.” Oct. 23, 2020. *Virginia Radio*. Web.

Other states, like West Virginia, have created statewide oversight programs for their systems.

While some states use these timelines to guide the project, there are other states that have higher degrees of oversight for their radio expansion projects. West Virginia, for example, created a Statewide Interoperable Executive Committee (SIEC) to oversee the development of the state's Statewide Interoperable Radio Network (SIRN).⁵⁸ The SIEC was created by statute and has monthly meeting requirements. At these meetings, the members discuss current SIRN issues, monitor SIRN system status and implementation, and provide guidance for the betterment of the system. SIRN uses more than 85 radio tower sites across the state, with new sites being built each year.⁵⁹

Chapter 3

Project Management Issues

This chapter provides an overview of decisions and actions that led to issues with the Statewide Emergency Responder Voice System (SERVS). Generally, management did not conflict with statutes or regulations, but decisions led to a slower process.

This chapter provides an overview of the decisions and actions that likely led to issues with the Statewide Emergency Responder Voice System (SERVS). Generally, the management of SERVS did not conflict with statutes or regulations; however, the decisions made by management resulted in SERVS not encountering any oversight mechanism that could have assisted with accelerating the process. This chapter contains three matters for legislative consideration and six recommendations for agencies.

Budget And Planning Issues

Significant appropriations for SERVS have gone unspent across multiple budget cycles, revealing a disconnect between funding and implementation. The absence of a strategic plan has left no clear milestones to guide progress or measure results.

A central concern in the review of SERVS lies in the disconnect between appropriations, spending, and long-term planning. While tens of millions of dollars have been appropriated as bond funding across multiple biennia, large portions of these funds have remained unspent, with nearly half of the money in two of the three budget cycles left unexpended before the next budget was enacted. Where expenditures have been recorded, they often lag behind the fiscal year in which they were appropriated, suggesting a lack of alignment between financial planning and project implementation. The absence of a strategic or master plan compounds these problems, leaving no clear milestones against which to measure progress or allocate funds efficiently. This fragmented approach creates uncertainty for policymakers and stakeholders and obscures the true pace of project development.

Appropriations And Expenditures Over Time

As of FY 2025, just over half of SERVS appropriations had been spent, with most funds used for radios and related equipment. Construction activity began two years into the project and surged in the most recent fiscal year.

KSP provided expenditures for the SERVS project, but the data did not show expenditures by year. To show trends over time, the statewide accounting system was queried for all transactions associated with Fund C93G, which is a designated fund for SERVS. Table 3.1 provides the resulting expenditures. As of the end of FY 2025, 50.4 percent of appropriations had been spent with 81.9 percent of expenditures paying for special mobile equipment.^a This category includes purchases of radios and

^a The Justice and Public Safety Cabinet and the Finance and Administration Cabinet confirmed that, as of October 28, 2025, approximately 61.0 percent of project funds have been expended.

consoles and has been used throughout the project timeline. Construction work began in FY 2022, 2 years after the start of the program, but approximately 43.6 percent of construction expenditures occurred in the most recent fiscal year.

Several categories have no transactions recorded until fairly late in the overall project implementation. Land and right of way acquisitions have been relatively rare, appearing in FY 2021 and FY 2025. Some categories have few transactions. There were only two transactions related to computer equipment, and only five transactions related to land or right of way, two of which were likely duplicates or modifications to other transactions.⁶⁰

Many SERVS spending categories show little or no activity until late in the project. Land acquisition and IT development began several years after project initiation, with project management contracts shifting from MISICOM to Harvey Nash in FY 2024.

The IT application development category includes contracts for project management partners, which change over time. The first expenditure for project management occurs about halfway through FY 2022, and all payments for this category are given to MISICOM, Inc. Payments are given to the same five contracting employees through MISICOM until the second month of FY 2024, at which point the partner switches to Harvey Nash Inc.

Table 3.1
SERVS Appropriations And Total Expenditures
In Millions Of Dollars
FY 2020 To FY 2025

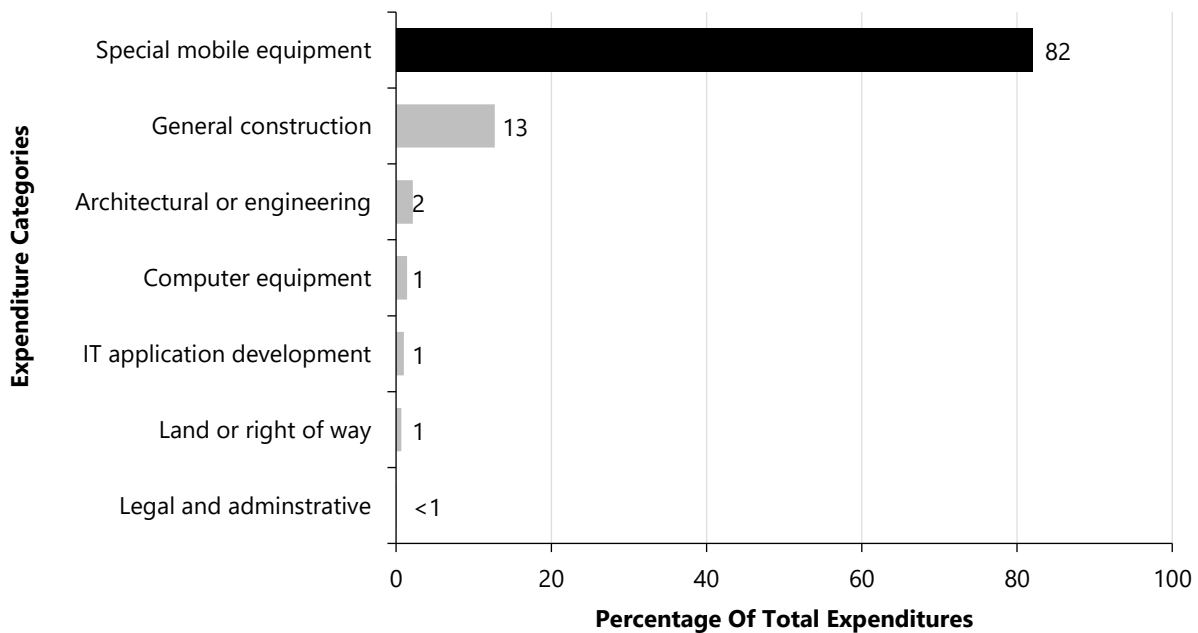
Appropriations And Expenditures	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024	FY 2025	Total
Appropriations	\$35.1	\$52.5	-	\$52.9	\$28.0	\$47.9	\$216.4
Total expenditures	18.1	4.7	40.7	13.8	12.3	19.6	109.2
Special mobile equipment	18.1	3.9	38.1	10.7	6.4	12.2	89.4
General construction	-	-	2.2	2.1	3.6	6.1	13.9
Architectural or engineering	-	0.1	0.2	0.1	0.6	0.8	2.4
Computer equipment	-	-	-	-	1.4	0.2	1.5
IT application development	-	-	0.2	<0.1	0.3	0.3	1.1
Land or right of way	-	0.7	-	-	-	0.1	0.7
Legal and administrative	-	<0.1	<0.1	-	<0.1	<0.1	0.1

Sources: Staff analysis of eMARS expenditure data associated with Fund C93G, which is designated for SERVS; Kentucky 2018 Acts of the General Assembly, Chapter 169, p. 1347; Kentucky 2020 Acts of the General Assembly, Chapter 92, p. 908; Kentucky 2022 Acts of the General Assembly, Chapter 199, p. 1715; and Kentucky 2024 Acts of the General Assembly, Chapter 175, p. 1897.

SERVS funding has heavily favored radio equipment, with limited investment in infrastructure. Buying hardware before tower sites are secured or ready for use raises concerns about planning, sequencing, and long-term value.

To date, more money has been spent on special mobile equipment than on any other category by a wide margin, and this category has also received the largest appropriations overall. This pattern indicates that the procurement of radios, consoles, and other communication hardware was a top priority for project managers from the outset. While securing operational equipment is a necessary component of the SERVS project, the decision to prioritize the purchase of hardware with finite technological life cycles and potentially limited warranty periods, ahead of acquiring land or designing tower installations, raises concerns about project planning and sequencing. Without a complete understanding of site acquisition timelines and construction readiness, investing heavily in equipment introduces the risk that much of it could age in storage, depreciate in value, or fall out of warranty before being placed into service. Figure 3.A illustrates that 82 percent of current spending has gone to the purchase of special mobile radio equipment.

**Figure 3.A
Percentage Of Total Expenditure
For SERVS By Category
FY 2020 To FY 2025**

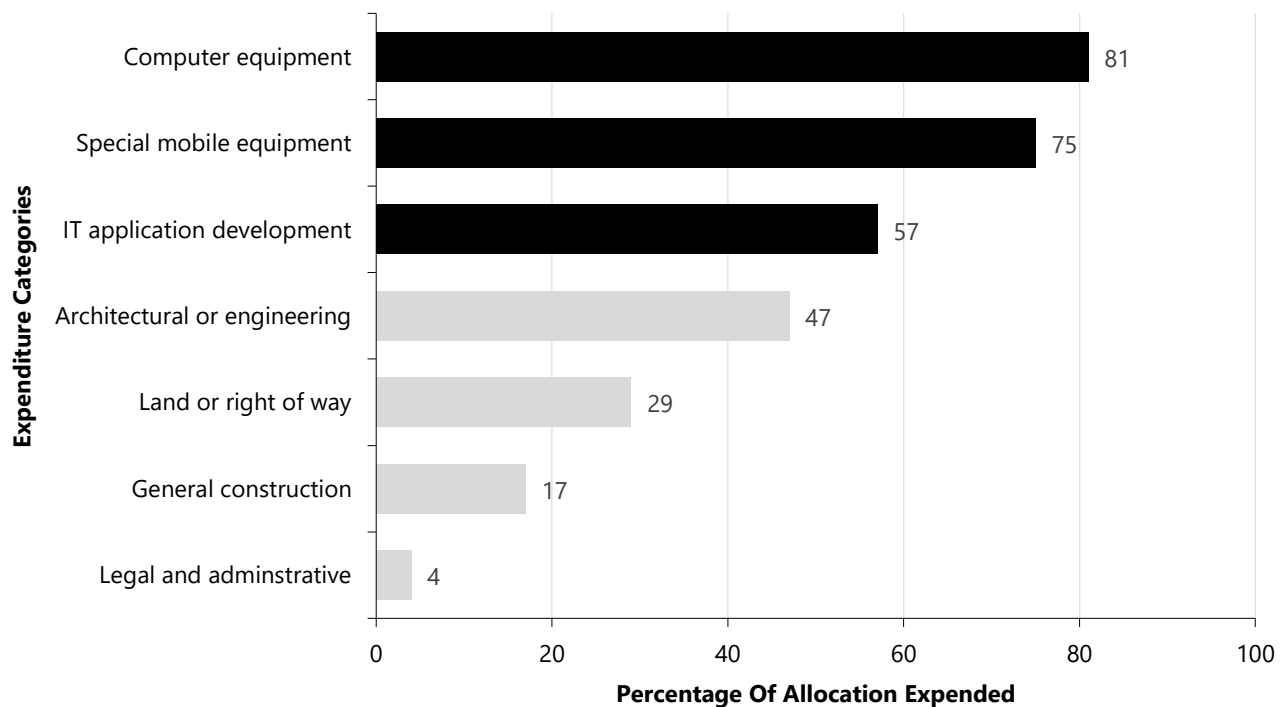


Source: Staff analysis of eMARS expenditure data associated with Fund C93G, which is designated for SERVS.

As of FY 2025, KSP has spent 75 percent of its equipment funds but far less of its land and construction funds. Persistent underspending in these categories points to ongoing challenges in site acquisition and tower development.

To better understand spending on the SERVS project, Figure 3.B shows total spending by category as a percentage of KSP’s allocations to each category. Three expenditure categories have used more than 50 percent of their total allocations as of FY 2025. While special mobile equipment has been the largest source of expenditures so far, KSP has spent about 75 percent of the funds allocated to that category. Despite the relatively low spending on land, KSP has spent about 30 percent of its \$2.5 million allocation. In materials provided to LOIC for its September 11, 2025 meeting, KSP characterized IT application development as “Project Management” and legal and administrative costs as “Site Acquisition.”⁶¹ The lower percentages spent on legal and administrative costs, general construction, and land indicate that land acquisition and subsequent building of towers are a persistent issue with the SERVS project.

**Figure 3.B
 SERVS Expenditures As A Percentage
 Of Each Category Allocation
 FY 2020 To FY 2025**



Sources: Staff analysis of eMARS expenditure data associated with Fund C93G, which is designated for SERVS; Natalie Burikhanov, legislative director, Kentucky Justice and Public Safety Cabinet. Email to Joel Thomas, September 20, 2025.

Four vendors account for 81 percent of SERVS spending, with one vendor alone receiving two-thirds of total funds. Combined with high unspent balances and no central authority, this concentration on vendors heightens oversight and performance risks.

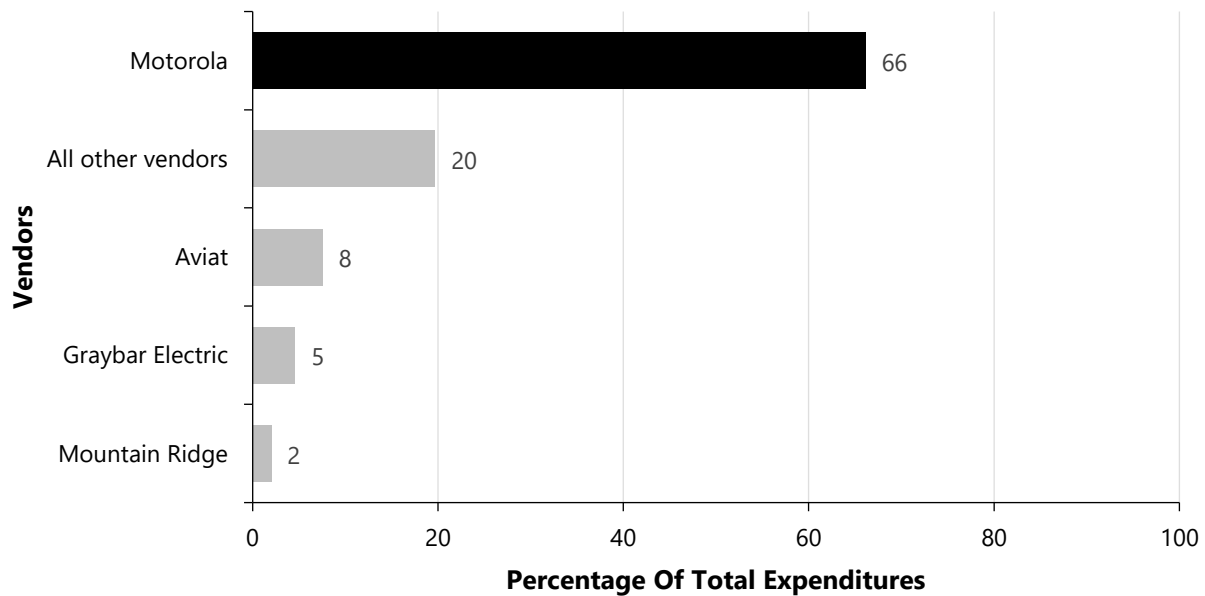
Project Spending Is Concentrated In A Single Vendor. The distribution of project spending is highly concentrated among a small number of vendors. A single vendor is responsible for 66 percent of total spending, with the top four vendors accounting for 81 percent of all project expenditures.

The combination of a high level of unspent balances and concentrated vendor spending magnifies risk in two ways, especially alongside the absence of a central project authority or manager. First, there are large amounts of remaining appropriated funds from previous biennia. When there continues to be requests for additional funds despite existing funds, it is not clear if there is a strong plan for use. Second, a small number of vendors dominate the share of funds actually spent; reliance on so few providers makes project success disproportionately dependent on their performance, while the lack of a central authority means no single entity is positioned to ensure that vendor performance aligns with statewide objectives.

Motorola dominates SERVS spending, accounting for most project funds and nearly all equipment purchases. Its \$72 million share underscores the project's heavy dependence on a single vendor.

Motorola has received approximately two-thirds of the funds expended on SERVS. Figure 3.C shows the relative amount of SERVS funding paid to the four vendors with the greatest expenditures. With \$72 million of expenditures, Motorola received more funds than all other vendors combined. Most of the work (96.1 percent) was for special mobile equipment; Motorola also received \$2.5 million for construction and \$315,884 for application development services.

Figure 3.C
Percentage Of Total Expenditure
For SERVS By Vendor
FY 2020 To FY 2025



Note: Transactions in eMARS were associated with 60 vendor codes, but one of these codes indicated the vendor was not entered.

Source: Staff analysis of eMARS expenditure data associated with Fund C93G, which is designated for SERVS.

By relying on preexisting master agreements, the state bypassed a project-specific competition for SERVS. Given the scale of funding, this raises concerns about missed opportunities for cost savings, transparency, and tailored contract terms.

Motorola has received a significant amount of funds from the General Assembly. While the original master agreements used for the SERVS project were established through a competitive bidding process, the decision to procure SERVS-related goods and services under those existing agreements only required a procedural justification for bypassing a new competitive solicitation or negotiation process. Although current procurement laws do not prohibit the use of master agreements in place of new solicitations, the scale of the expenditures associated with SERVS raises legitimate concerns about transparency and accountability. Given the amount of funds involved, the state may have been able to negotiate better rates or attract interest from other providers. Further, the lack of a project-specific competitive procurement process may have limited the state's ability to negotiate project terms tailored to the unique needs of SERVS.

Policies for the Finance and Administration Cabinet do allow exceptions from competitive negotiation for goods or services that can be provided from only one vendor, but the user must provide clear written justification. The policy foresees exceptions for purchase like instructional material, patented equipment, or proprietary goods.⁶²

A review of Motorola payments found \$44.9 million in invoices paid an average of 65 days late, with one payment delayed 261 days. Late payments not only affect vendor relations but may also incur penalties under state law.

Some Motorola Payments May Have Been Late.

There are over 800 transactions under the C93G code in eMARS, making analysis of all payments difficult. Instead, all payments to Motorola were reviewed because the vendor received over half of all funding for SERVS and received some of the largest individual payments. This sampling found that KSP may have issued late payments for \$44,928,612 worth of invoices. These payments may have been late by an average of 65 days, with the latest payment being 261 days behind the due date. While late payments harm the reputation of the state, there is also a statute that allows for penalties due to late payments.

The Justice and Public Safety Cabinet and the Finance and Administration Cabinet indicated these payments were not late, stating that invoices were used to ensure prices match delivery orders. KRS 45.453 mandates “All bills shall be paid within thirty (30) working days of receipt of goods and services or a vendor's invoice except when the purchasing agency has transmitted a rejection notice to the vendor.”⁶³ The invoices in the accounting system had due dates but did not have indications of when work was completed, preventing verification of whether payments were made on time.

Thirteen of 21 Motorola payments (totaling \$44 million) were at least 35 days late. State law requires agencies to pay vendors within 30 working days or risk owing interest penalties.

While the invoices matched all 21 purchase amounts, the payment dates were frequently after the due dates. Table 3.2 shows all payments made to Motorola, the number of days late, and the potential interest owed to vendors as a result. Of the 21 payments, 13 payments accounting for \$44 million were at least 35 days past the invoice date.

Table 3.2
Motorola Payments By Number Of Days Late
2019 To 2024

Invoice Date	Payment Date	Days Late	Expenditure	Potential Interest
Nov. 08, 2019	Aug. 25, 2020	261	\$473,350	\$41,181
June 12, 2019	Feb. 24, 2020	227	446,016	33,749
Nov. 17, 2022	July 24, 2023	219	5,568	406
Apr. 04, 2024	Oct. 21, 2024	173	315,884	18,216
Dec. 12, 2024	May 28, 2025	137	8,126,121	371,093
July 02, 2021	Nov. 22, 2021	113	1,876,163	70,669
July 02, 2021	Nov. 16, 2021	107	6,053,139	215,895
June 09, 2021	Sep. 13, 2021	66	5,190,635	114,194
June 25, 2020	Aug. 24, 2020	30	2,162,765	21,628
Aug. 19, 2022	Nov. 13, 2022	25	865,106	7,209
June 06, 2019	July 11, 2019	5	11,827,176	19,712
June 06, 2019	July 11, 2019	5	5,260,069	8,767
Nov. 10, 2021	Dec. 15, 2021	5	2,326,620	3,878
Nov. 23, 2021	Dec. 07, 2021	0	14,527,533	0
Nov. 23, 2021	Dec. 20, 2021	0	4,502,790	0
Jan. 06, 2022	Jan. 11, 2022	0	2,360,280	0
Dec. 21, 2023	Jan. 04, 2024	0	740,329	0
Nov. 10, 2021	Nov. 29, 2021	0	460,512	0
July 08, 2023	July 24, 2023	0	411,686	0
Sep. 21, 2020	Oct. 05, 2020	0	105,480	0
Nov. 18, 2020	Dec. 01, 2020	0	63,720	0
Total			\$68,100,942	\$926,597

Source: Staff analysis of C936 fund expenditures paid to Motorola, FY 2020 to FY 2024.

KSP appears not to have paid required late fees under Kentucky law, despite significant payment delays. If penalties were enforced, interest owed to Motorola alone could approach \$1 million.

KRS 45.454 states “[a]n interest penalty of one percent (1%) of any amount approved and unpaid shall be added to the amount approved for each month or fraction thereof after the thirty (30) working days which followed receipt of the goods or services or vendor's invoice by a purchasing agency.”⁶⁴ The purchase order amounts match the transaction and invoice amounts and there are no other smaller amounts disconnected from an invoice, so it does not appear that KSP or the Finance Cabinet ever paid this penalty. If the statute were to be invoked, KSP would owe Motorola almost \$1 million in late fees. However, this was a sample of the most used vendor. There may be other payments that were also late.

While there is a possibility that the receipt of goods and services occurred later than receipt of the invoice, that does not appear to have happened here. First, the invoices from Motorola explicitly state a due date. Congruent with KRS 45.454, it is 30 days after the date of the invoice. Second, email records from Motorola to KSP show requests about how to pay for past due invoices.⁶⁵

Frequent late payments undermine KSP's reputation and future contracting prospects. Establishing a payment-tracking system, in consultation with the Finance and Administration Cabinet, could reduce delays and improve accountability.

Given the frequency of late payments on large purchases, KSP may wish to create a system to minimize late payments in the future. These late payments could harm the reputation of KSP and make vendors less likely to be interested in cooperating on future procurements. The Finance and Administration Cabinet would likely be a good source of advice on creating such a system due to the frequency of payments that go through the cabinet.

Recommendation 3.1

Recommendation 3.1

Kentucky State Police should review its payment processing system and establish any internal controls necessary to ensure payments are made on time.

State law requires Fish and Wildlife to reimburse 5 percent of the debt service for the State Police radio system each year. KSP reports SERVS is funded entirely through state appropriations, raising questions about whether these payments are being made.

Debt Service Payments. KRS 150.021(2) requires the Finance and Administration Cabinet to assess the Department of Fish and Wildlife Resources each fiscal year an amount equal to 5 percent of the debt service associated with all phases of the capital project for “the two-way radio system utilized by the Department of Kentucky State Police.” The fee shall continue until all debt for the system is retired. However, KSP’s August 20 response to a data request indicated that SERVS was funded solely through appropriated state funds.⁶⁶ The Finance and Administration Cabinet later confirmed that the Department of Fish and Wildlife has been making the yearly payments.⁶⁷

Inconsistent Requests For Funding

SERVS planning documents contain inconsistent cost estimates and unclear timelines, suggesting weak financial planning. References to 10-year funding may have given legislators the impression that no additional appropriations would be required.

Planning documents for SERVS present inconsistent estimates of the total funding needed to complete the system, reflecting uncertainty and a lack of clear financial planning. In multiple instances, capital plans requested funding and then indicated that the funding would cover the next 10 years. While this phrasing may have referred to specific portions of SERVS, it may also have misled legislators into thinking additional funding would not be needed.

On June 3, 2019, the Capital Planning Advisory Board received the 2020-2026 Agency Capital Plan for the Justice and Public Safety Cabinet. Page 3 requests \$52,450,000 for the 2022-2024 biennium and states SERVS “will have a life that extends over a 10-year master agreement. The cost will be divided over this 10-year period.” It stated the project was planned to start July 2019.⁶⁸

While early capital plans projected \$55.4 million would complete SERVVS, internal DECA documents from early 2022 anticipated additional costs of at least \$33.9 million. This contrast shows that higher project costs were expected even as official plans suggested full funding.

On September 15, 2021, the Capital Planning Advisory Board received information technology project descriptions for the Justice and Public Safety Cabinet. Page 3 requests \$55,440,000 for the next biennium and states SERVVS “will have a life that extends over a 10-year master agreement. The cost will be divided over this 10-year period.”⁶⁹ The 2022–2028 Statewide Capital Improvements Plan projected that the \$55.4 million would complete the project.⁷⁰

By early 2022, however, documents from the Division of Engineering and Contract Administration (DECA) already suggested that additional funding would be necessary. A January 2022 Request for Proposals (RFP) for emergency tower replacements stated on page 6 that there was “potential additional project budget of [\$33.9 million] East Region.”⁷¹ The following page further noted that the project included the Central Region and could extend into the Eastern Region “as further funding is appropriated.”⁷² This language demonstrates that, at the same time official plans were citing \$55 million as sufficient, DECA anticipated substantially higher costs to address statewide needs.

In 2025, the Justice and Public Safety Cabinet requested an additional \$107.4 million to complete SERVVS, despite earlier plans suggesting prior funding was sufficient. Conflicting projections across years point to insufficient communication and long-term financial planning.

On May 21, 2025, the Capital Planning Advisory Board received the 2026-2032 Capital Planning System Report for the Justice and Public Safety Cabinet. Page 6 requests an additional \$107,427,000 to complete the final phase of the project in east Kentucky.⁷³

The Kentucky Statewide Interoperability Coordinator (SWIC) later characterized funding shifts as reallocations that had not been foreseen.⁷⁴ Yet, by early 2022, DECA clearly recognized that more money would be required to expand beyond the initially defined regions.⁷⁵ The inconsistency among the Capital Improvements Plan, agency projections, and subsequent procurement documents highlights gaps in communication and long-term financial planning. This inconsistency may make understanding the project more difficult for the General Assembly when determining whether to provide future funding. It may be beneficial for the General Assembly to add requirements for future distribution of funds, such as regular reports to a legislative committee or projections of future financial needs.

Matter For Legislative Consideration 3.A

Matter For Legislative Consideration 3.A

The General Assembly may wish to consider adding additional requirements as a condition for Kentucky State Police to receive funding for the Statewide Emergency Responder Voice System.

SERVS Funding And Expenditure Distribution

KSP's SERVS financial data are accurate but presented in ways that obscure key spending trends. As of June 2025, \$107.2 million in appropriated funds remained unspent, limiting visibility into project progress.

KSP's accounting of SERVS appropriations and expenditures appears to be accurate but the manner in which the information is presented to legislators tends to obscure trends in spending. Following an LOIC request, KSP provided an update of funding and spending as of June 10, 2025.⁷⁶ LOIC staff were able to verify the accuracy of the data provided by KSP, but the obscuring of underlying trends and nuances prevents legislators and the public from better understanding project progress.

When KSP provided an update to LOIC during its September 11, 2025 meeting, it provided the budget as seen in Table 3.3. Grouping project funding strictly by biennium, while understandable from a budgeting perspective, further obscures the reality of project spending. This table gives the appearance that the various phases of the project were discrete components of the overall plan, and that each phase was relegated to a particular budget cycle.

**Table 3.3
 Kentucky State Police Summary Of SERVS
 Provided On September 11, 2025**

Biennium	Phase Name	Budgeted	Phase Status
2018-2020	Phase I	\$35,100,000	Completed
2020-2022	Phase II	52,450,000	Partially Completed
2022-2024	Phase III	80,909,000	Partially Completed
2024-2026	Phase IIIA	47,900,000	Partially Completed
Total current appropriations		216,239,000	
2026-2028	Closeout Phase Request	107,427,000	
Total appropriations with request		\$323,786,000	

Source: Natalie Burikhanov, legislative director, Kentucky Justice and Public Safety Cabinet. Email from Kentucky State Police to William Spears, Sept. 11, 2025.

Table 3.4, shows the appropriations for SERVS each biennium, along with the current spent and unspent amounts.^b The expenditure data for SERVS illustrates an imbalance between what has been appropriated and what has been put to use. Significant resources—\$107.2 million—had not yet been put to active use as of June 30, 2025.

Table 3.4
SERVS Budget And Amounts Spent
By Biennium As Of June 30, 2025

Biennium	Appropriated	Expended	% Spent
2018-2020	\$35,100,000	\$18,114,160	51.6%
2020-2022	52,450,000	45,444,889	86.6
2022-2024	80,909,000	25,974,629	32.1
2024-2026*	47,900,000	19,620,248	41.0
Total	\$216,359,000	\$109,153,927	50.5%

*Ongoing budget cycle

Source: LOIC staff analysis of Kentucky State Police data.

LOIC analysis found that in two of the three biennia, about half of SERVS appropriations went unspent before the next budget cycle. This pattern suggests recurring delays in putting authorized funds to use.

The initial amounts reported for the SERVS project reflect only the appropriations that the General Assembly authorized in each biennial budget. To gain a more accurate picture, LOIC staff independently calculated the actual spending and the percent of funds spent.^c For two of the three biennia, roughly half of the appropriated funds were not spent before the next budget cycle began.

Although SERVS funding was grouped by phase and budget cycle, implementation overlapped across all four phases. This presentation overstates early progress and raises questions about the need for \$107.4 million in new funding while half of prior allocations remain unspent.

While funding may theoretically be tied from budget cycle to phase, the reality of implementation was different. Phase I was not completed until after the 2018-2020 biennium, and all four current phases overlapped in implementation by the latest date in the project.⁷⁷ The number given in the table above for Phase I, along with the “completed” label, and the grouping of the entire phase as a biennial period rather than as fiscal year, makes it seem like more work occurred early on in the project than actually occurred. It is also unclear why an additional \$107.4 million is needed when approximately half of currently appropriated funds have not been spent.

^b Data are current as of June 11, 2025.

^c Data was taken from the statewide accounting system (eMARS), using the C93G funding code designated for SERVS.

Procurement And Contracting Issues

SERVS procurement relied almost entirely on existing master agreements rather than project-specific bids. While this expedited purchasing, it reduced transparency and made tracking expenditures against contracts more difficult.

LOIC's initial request to KSP for purchasing and contract records indicated that the SERVS project relied almost exclusively on master agreements for procurement. This suggested that project managers avoided project-specific competitive bidding, instead placing delivery orders against pre-existing agreements. Such an approach can expedite purchasing, but it also reduces transparency and complicates oversight because the connection between project expenditures and contractual authorizations is less direct.

Use Of Master Agreements

Using master agreements for SERVS purchases is consistent with state policy and can improve efficiency. However, missing documentation and minimal project-level tracking obscure how procurement decisions align with project goals.

Master agreement (MAs) are contracts for goods and non-professional services established by the Finance and Administration Cabinet to utilize the state's purchasing power for the best possible pricing through consolidation of agency or state volume.⁷⁸ The use of existing master agreements to procure goods and services for SERVS is not problematic in itself. Master agreements are a common procurement tool that can provide efficiency and leverage pre-negotiated terms, and the state procurement manual states agencies should use MAs to fulfill their needs before using other methods.⁷⁹ However, the lack of supporting documentation and project-level organization reduces transparency. Without clear records linking delivery orders, invoices, and payments back to project objectives, it becomes difficult to verify why procurement decisions were made or whether they achieved the best value for the project.

Contracts typically require a determination and findings that establish why they are used. The determination and findings for the Motorola contract stated, "It has been determined to be in the best interest of the Commonwealth to enter into a participating addendum through NASPO to award a master agreement with Motorola for Public Safety Radios."⁸⁰ That determination and findings was not sufficient to justify using Motorola for a large-scale project. As a comparison, federal regulations state that agency heads should establish greater formality when acquisitions are more complex and costly.⁸¹ Given the size and complexity of SERVS, along with potential risks, it would have been appropriate to consider whether the master agreement was the most appropriate vehicle or if a dedicated solicitation would have better fit the state's needs.

The limited documentation for SERVS procurement creates the appearance that decisions were based on assumptions rather than analysis. The issue lies not in the use of master agreements but in the lack of records and oversight ensuring transparency.

This absence of documentation creates the potential perception that decisions may have been based on assumptions about vendor capacity or pricing under the master agreements, rather than on demonstrable analysis or competitive considerations specific to SERVS. Alternative procurement methods, such as competitive sealed bidding or requests for proposals, have clearly delineated processes that require multiple steps for the requesting party to complete. Completing those additional steps may have allowed a higher level of transparency which is not present now. In practice, the issue is less about the procurement method used and more about the failure to maintain sufficient records and oversight to ensure transparency and accountability in how those methods were applied to the project.

In effect, SERVS is being implemented as a collection of individual transactions and contracts rather than as a centrally managed capital project. Although dollar thresholds are important in procurement oversight, the nature of the project should drive the level of management structure required. Large-scale, outcome-driven projects like SERVS demand comprehensive contract management frameworks that align procurement activities with project goals, ensure accountability, and allow for clear evaluations of activities.⁸² Contract management frameworks also allow for easier transitions due to staff changes.

SERVS operates as a series of independent transactions rather than a coordinated capital project. Extensive use of master agreements also bypassed Government Contract Review Committee oversight, allowing major spending to occur without external review.

In addition, the extensive use of MAs allowed SERVS to avoid review by the Government Contract Review Committee. KRS 45A.705 establishes the committee to review personal service contracts, tax incentives, and memoranda of agreement. MAs are not considered to be any of those agreements and are not reported to the committee, meaning hundreds of millions of dollars can be spent on SERVS without review while smaller projects are reviewed by the committee.

Although most SERVS purchases relied on master agreements, at least two contracts were competitively bid through DECA. However, financial data remain fragmented across agencies, preventing a complete accounting of project funds.

While master agreements were the prevailing procurement vehicle, competitive bidding was not entirely absent. A response to a data request provided by the Finance and Administration Cabinet (FAC) revealed at least two procurements that were competitively bid and awarded specifically for the SERVS project through the Division of Engineering and Contract Administration (DECA).⁸³

At present, staff do not have the conclusive financial evidence to conduct a full financial audit of SERVS. The challenge lies in information being scattered across multiple agencies, organized inconsistently, and maintained without a centralized ledger or

reporting structure. Originally, KSP representatives told LOIC staff that any specific solicitations, bidding documentation, contracts, and performance evaluations would need to be requested through the Finance and Administration Cabinet.⁸⁴

Disorganized and incomplete records make it difficult to trace SERVS decisions and spending, increasing transparency issues and efficiency risks. A dedicated audit is needed to confirm that funds (especially bond proceeds) were used appropriately.

The lack of centralized planning and documentation has made it difficult to trace decisions and expenditures, reducing transparency and increasing the risk of inefficiency or misallocation. Although a comprehensive financial audit is not feasible at this time, the scattered information points to a high likelihood that financial risks exist. A dedicated audit of project expenditures would be necessary to ensure that SERVS funds—particularly bond proceeds—were used appropriately and in compliance with state law and capital project restrictions.

Matter For Legislative Consideration 3.B

Matter For Legislative Consideration 3.B

The General Assembly may wish to engage the Auditor of Public Accounts to conduct a full financial audit of the SERVS project, including a compilation of project spending that ties together appropriations, procurement actions, and payments.

Vendor Performance Evaluation

Kentucky's Model Procurement Code does not mandate formal vendor performance evaluations, but best practices call for them. Systematic performance monitoring is key to ensuring accountability and improving future contracting decisions.

Kentucky's Model Procurement Code does not explicitly require that performance monitoring be documented through formal evaluations. However, procurement best practices—and audit oversight expectations—stress that systematic vendor performance evaluation is essential for ensuring quality, accountability, and decision-making in contracting.⁸⁵ Performance measurement systems help capture whether vendors met contract obligations and support future procurement decisions; these systems are recognized across both private-sector and public-sector procurement frameworks.⁸⁶

SERVS vendor evaluations provide little insight, consisting mostly of identical boilerplate statements with no narrative feedback. In contrast, evaluations from other projects include meaningful descriptions of billing accuracy and vendor responsiveness.

Although performance evaluation documents exist for some SERVS-related contracts, their usefulness is limited. The documents tend to be basic with little detail, offering only boilerplate statements of satisfactory completion rather than meaningful assessments of vendor performance.⁸⁷ Performance evaluation documents exist for some vendors that provide services via master agreements, but they do not contain useful information. For example, the vendor performance evaluation documents provided by FAC all contain the same rankings for criteria and do not include any descriptions. The description field for each document still contains the boilerplate guidelines for how to

respond to that field, as seen in Figure 3.D. By comparison, an example of a performance evaluation for a different project (PE 758 220000279) has a billing description that details the state was billed appropriately and to specifications and a responsiveness description that indicates the vendor attempted to rectify issues with the service.

By contrast, the Federal Acquisition Regulation are much more stringent than Kentucky’s standards. They require Quality Assurance Surveillance Plans on all performance-based acquisitions (FAR 37.604). Agencies must perform contract administration functions such as post-award orientation, inspections, surveillance, and monitoring of the financial condition (Ibid.). Federal agencies also must maintain formal performance evaluation systems. For most agencies this is housed in the Contractor Performance Assessment Reporting System (CPARS), and they must prepare evaluations at least annually and at the time the work is completed (Far 42.1502-42.1503). When evaluating bids or proposals on future projects, federal agencies use the mandatory evaluations of past projects to determine vendor reliability (FAR 15.304).

Figure 3.D
Vendor Performance Evaluation Example
For SERVS Services

PERFORMANCE MONITORING				
Report Type	Report Date	Reported By	Description of Vendor Performance	Resolution Information

PROCEDURES SUMMARY			
Procedure Completed	Procedure Name	Procedure Required	Completion Date
No	Delivery Statistics Review	No	
No	Shipping Statistics Review	No	
No	Billing Statistics Review	No	

CRITERIA SUMMARY		
Criteria Name	Rank	Description
BILLING	4 - Good	Were items billed accurately? "Bill to" proper agency/customer, billing reflects accurate discounts if applicable, and invoice discrepancies resolved in a timely manner?
DELIVERY	4 - Good	Were items delivered within the time indicated in the contract terms?
QUALITY	4 - Good	Comment on technical accuracy, appropriate and thoroughness of analysis, other aspects of deliverable quality:
RESPONSIVENESS	4 - Good	Comment on contractor’s responsiveness to Contracting Officer, communication links at project and technical levels, response to work scope changes, response to special requests, ability to address and resolve problems, other aspects of responsiveness
SPECIFICATIONS MET	4 - Good	Were items to the specifications as detailed in the contract description?

Placeholder text left by evaluator

Source: PE 758 2200001900 in eMARS.

This lack of vendor performance depth is problematic for two reasons. First, it reduces the ability of evaluators or oversight bodies to determine whether contractors met expectations beyond simply delivering goods or services. Elements such as timeliness, adherence to budget, quality of work, or responsiveness to project challenges are not addressed in any substantive way. Second, when evaluation forms are completed in a routine manner, they do little to inform future procurement decisions.

KEWS And SERVS

SERVS includes modernization of the Kentucky Emergency Warning System (KEWS), whose infrastructure underpins statewide communications. Because KEWS and SERVS contracts overlap, related expenditures and records are often intermingled, complicating financial tracking.

Although the SERVS project is intended to provide a new, unified statewide P25 trunked radio system, the existing Kentucky Emergency Warning System (KEWS) is being modernized and integrated as part of that effort.⁸⁸ KEWS historically provided microwave backbone and communications infrastructure for state agencies. As a result, contracts and capital expenditures associated with updating KEWS overlap with those tied to SERVS. From a contracting and procurement standpoint, this creates a challenge because KEWS upgrades require a different level of work compared to SERVS sites, especially new SERVS sites. KEWS sites appear on SERVS maps as if they are sites specifically for SERVS.

Lack Of Central Project Management

Fragmented recordkeeping prevents a unified view of SERVS. With planning housed at KSP and procurement managed by FAC, the absence of an integrated project ledger obscures total spending and weakens oversight.

While contracting and purchasing activities are formally routed through the FAC, there is no single authority charged with maintaining a complete record of project activities. Instead, information related to SERVS is scattered across multiple agencies.

For example, contracting records are managed by the FAC, but there is no project-specific ledger or code that ties contract awards, delivery orders, and payments together in a way that isolates SERVS. LOIC staff used fund code C93G to isolate SERVS contracting records, but it may not represent the total project. Financial records exist within eMARS but are structured by agency, document type, or fund source, not by project. As a result, it is not possible to view all SERVS expenditures in one place. Planning and operational oversight appear to reside largely with the KSP, but these functions have not been integrated with procurement and financial tracking.

KSP reported holding periodic meetings with the Finance and Administration Cabinet to monitor SERVS, but no agendas or minutes were provided. The absence of documentation leaves no evidence of structured oversight or issue tracking.

KSP representatives indicated it met periodically with the Finance and Administration Cabinet to monitor the progress of SERVS during its deployment.⁸⁹ However, no documentation of those meetings was produced in response to requests for project records. Even the most basic records, such as agendas or meeting minutes, are absent. Without this evidence, there is no way to demonstrate that senior officials maintained structured oversight of the project or that potential recurring problems—such as delays in site acquisition, vendor performance concerns, or financial reporting gaps—were addressed in a systematic way.

Without centralized management, no single agency is accountable for SERVS's financial and operational integrity. Fragmented records heighten the risk of errors and make it difficult for legislators and oversight bodies to see the full project picture.

The lack of centralized management has several consequences. It weakens accountability; because no single entity maintains a consolidated record, it is difficult to identify which agency is responsible for ensuring the project's financial and operational integrity. This fragmentation increases the risk of errors, duplicate payments, or undocumented expenditures and makes it difficult to assess progress against appropriations or project milestones. It also means that legislators, performance evaluators, and other oversight bodies cannot obtain a comprehensive picture of SERVS without reconstructing it piecemeal from scattered data sources.

Lack Of Master Plan And Project Milestones

Despite significant appropriations, SERVS lacks a master plan or strategic plan. Milestones, phasing schedules, or a central timeline could not be produced by KSP.

Although significant funding has been appropriated for SERVS, the project lacks a comprehensive master plan or strategic plan to guide implementation. Despite requests by LOIC staff, no set of milestones, phasing schedules, or central timeline has been produced by KSP to measure progress. The explanation offered by project managers is that the project's inherent complexity makes it too difficult to generate a formal plan with milestones. From an auditing perspective, this rationale differs from general standards. For example, Federal Acquisition Regulation Subpart 7.1 requires agency heads to establish when greater formality in plans is needed "as the acquisition becomes more complex and costly," indicating that greater planning is needed as complexity increases.⁹⁰ At the state level, Utah developed an interactive timeline with expected completion dates.⁹¹

The Kentucky Procurement Manual and Contract Management Guide, which has statutory authority under KRS 45A, requires the use and submission of three templates for multi-year or complex procurements: Preliminary Annual Procurement Plan, a Contract Management Plan, and a Project Status Report. However, unlike the federal system, these are only required at the beginning and

focus much more on the evaluation of bids or proposals. The Procurement Manual recommends the use of a Contract Administration Plan as a best practice, but does not require it.⁹²

Without defined milestones, there is no objective way to assess SERVS program or spending. The absence of a project schedule makes it impossible to explain why large portions of funding remain unspent.

Best practice in managing large, complex infrastructure projects is not to dispense with planning but to adopt phased approaches that allow for incremental monitoring and accountability. Kentucky's state budget director stated that capital projects typically follow a plan, including a programming phase, preliminary design phase, and a construction phase.⁹³ The absence of a documented plan for SERVS creates an oversight gap. Without milestones, there is no objective way for management, oversight bodies, or external reviewers to evaluate whether SERVS is proceeding on schedule, within budget, and toward its intended outcomes. This gap also impedes the ability to explain the large unexpended and unobligated balances that currently remain, since those figures cannot be tested against an established project schedule or deliverables.

Other states with similarly complex radio projects created phased plans with measurable milestones, unlike SERVS. The early purchase of 1,740 radios, made years before the system became operational, shows the risks of moving forward without a coordinated project plan.

Complexity Of SERVS Project. The argument that the complexity of SERVS prevents comprehensive planning is not consistent with how other states have approached similar projects. Systems such as Minnesota's ARMER or Pennsylvania's STARNet were also highly complex, multi-year deployments and system upgrades. Yet both developed phased project plans that allowed legislators, auditors, and the public to assess progress at defined intervals. Complexity in those cases justified more detailed planning, not less.⁹⁴

An early purchase of 1,740 radios in the SERVS project demonstrates the issue of not having plans for a complex project. By October 2025, these radios will have been available for 6 years and could be due for replacements or could be outdated in the near future.

On September 4, 2018, the chief engineer for KSP placed a request for 1,200 portable radios, 290 mobile radios, and an additional 250 different mobile radios for a total of \$11.8 million. The letter said the radios would be assigned to personnel and KSP vehicles and is "critical to replenish the agencies existing inventory, but will also serve as essential transitional hardware, being capable operating on both the old radio system infrastructure and the new radio system infrastructure." The payment document indicates the transaction was closed on August 2, 2019.

In the original request, the chief engineer indicates that the new radios will replace equipment “which has failed, is non-supported, and is no longer repairable.” This is a reasonable justification for purchasing the equipment, but the appropriation was intended to buy radios to use on the new system. Purchasing radios for a portion of the state at the start of the project while there is still significant infrastructure work to be completed could potentially result in outdated equipment, depending on the evolution of radio technology.

Land Acquisition Challenges

Land acquisition has been a significant obstacle for SERVS, but a contract to assist with it was not issued until nearly 6 years after the start of the project.

Land acquisition has proven to be a significant obstacle for the SERVS project. Notably, the Division of Real Properties did not solicit a contractor to assist with land acquisition until 2024, nearly 6 years after the project was launched.⁹⁵ The state’s topography, combined with issues of access and the legal complexities of property transactions, makes securing appropriate sites particularly challenging.

KSP appears to have initially concentrated on western Kentucky, where deployment was more tractable due to the greater availability of existing sites that could be used for SERVS.⁹⁶ In one case, KSP was able to use a tower owned by the National Guard for SERVS.⁹⁷ While this strategy facilitated early progress, it did not contribute to a comprehensive plan for the rest of the state, in particular eastern Kentucky. Its mountainous terrain, more fragmented property ownership patterns, and lack of existing infrastructure present more complex land acquisition problems.

Delays in tower siting and construction were inevitable because planning for these challenges does not appear to have been developed or was underestimated. The absence of early, coordinated involvement from the Division of Real Properties highlights a critical gap in project planning and suggests that land acquisition risks were neither fully assessed nor effectively mitigated at the outset of SERVS deployment.

Neither the Kentucky State Police nor the Division of Real Properties alone had the depth of expertise to anticipate the challenges associated with land acquisition for a project like SERVS, so engagement came too late to fully mitigate delays. Early engagement could have prepared for scenarios like having a large number of small, geographically dispersed or remote tower sites. A regulatory requirement for early coordination would help

ensure that land acquisition risks are identified, assessed, and planned for at the earliest stage of capital project development.

Recommendation 3.2

Recommendation 3.2

The Finance and Administration Cabinet should promulgate administrative regulations under the Model Procurement Code to require agencies to formally consult the Division of Real Properties at the outset of any capital project that involves land acquisition outside of typical office building projects.

Land acquisition for SERVS was delayed, with Real Properties not securing contract support until late 2024. Both KSP and Real Properties acknowledged challenges and limited capacity in managing complex property acquisitions.

While the Division of Real Properties has been actively assisting with property acquisition, it waited a significant time to acquire additional assistance through contracts. The director of the division was unsure of when KSP first contacted the office regarding site procurement but estimated the two began working together in 2020.⁹⁸ The contract for property acquisition was effective on October 15, 2024.⁹⁹ During August 29, 2025 testimony, the state budget director said there was a learning curve in the land procurement and that KSP should not attempt to acquire land because it was not in KSP's skill set.¹⁰⁰ There appeared to be an understanding that neither KSP or Real Properties were well suited to land acquisition for SERVS. If future projects require similarly unusual acquisitions, those projects may experience similar delays unless the division reconsiders its capacity.

Recommendation 3.3

Recommendation 3.3

When initially contacted on future projects, the Division of Real Properties should consider whether the project will exceed its capacity and require contracted assistance.

Without a strategic plan, SERVS lacks clear oversight and accountability. A formal plan would help align funding with results and allow legislators to monitor progress more effectively.

Lack Of A Master Plan Increases Financial And Project Outcome Risks. The lack of a strategic plan for SERVS increases the risk that financial resources will be underutilized or misaligned, that project delays will go unnoticed until they are severe, and that accountability for project outcomes will be diffuse. From an auditing standpoint, this condition reflects deficiencies in project management and weak oversight structures. A formal plan, even if periodically revised, would provide the necessary framework for monitoring progress, aligning funding with deliverables, and holding implementing agencies accountable for results. To prevent unneeded barriers for smaller projects, the General Assembly may wish to consult with the Finance and Administration Cabinet for a reasonable threshold to require formal plans.

Matter For Legislative Consideration 3.C

Matter For Legislative Consideration 3.C

The General Assembly may wish to amend KRS Chapter 45A (Kentucky Model Procurement Code) and related administrative regulations to require that any capital project above a specific appropriation threshold have an approved strategic or master plan before solicitation, award, or use of capital funds. The General Assembly may also wish to require that capital projects that require a plan include an evaluation of potential project risks.

Communication And Oversight Issues

SERVS Maps Introduce Confusion

Maps presented by KSP show SERVS site locations but lack clear legends or status indicators. Without distinguishing proposed, active, or completed sites, the maps provide little insight into actual project progress.

Throughout the study, the Kentucky State Police (KSP) regularly presented maps showing the location of SERVS sites. Although these maps likely draw on accurate data, their presentation has caused confusion about project progress. They lack a legend and do not clearly distinguish between proposed, in-progress, and operational sites. As a result, the maps offer limited value as stand-alone records and fail to show where deployment is complete, ongoing, or yet to begin.

When asked, during the July 2025 LOIC committee meeting, a KSP official provided verbally the following key to read the maps:

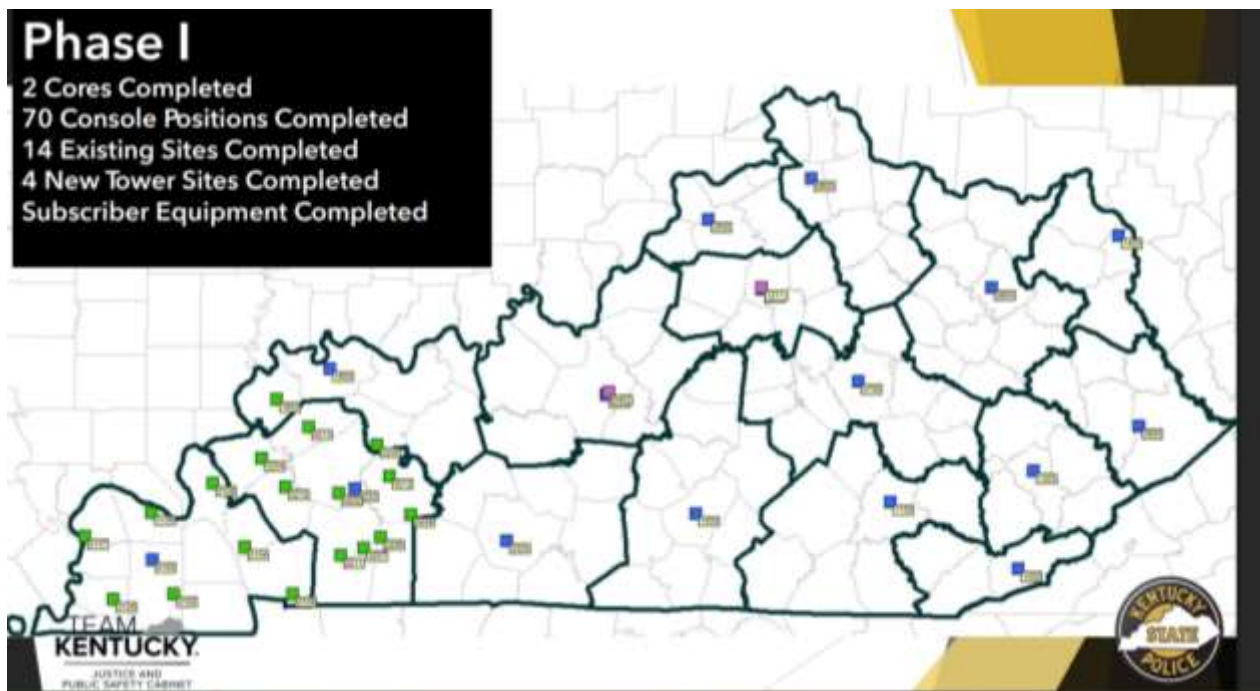
- Magenta are server core locations.
- Green are existing sites.
- Yellow are identified greenfield sites that require a tower.
- Blue are sites that need to be completed.¹⁰¹

KSP's Phase I map is the clearest available but remains incomplete and inconsistently coded, limiting its value as a progress record. Only four new towers were built in Phase I, and just two more are under construction, accounting for about 4.8 percent of the total planned.

Of the maps presented by KSP, the Phase I map is the clearest, showing 2 completed core sites and 14 existing sites across western Kentucky. However, it remains incomplete and inconsistently coded even with the knowledge of what the colors represent. Console positions and subscriber equipment, while mentioned in the legend, are not identified on the map. Four new tower sites are labeled as “completed” but do not receive different colors, obscuring the difference between new construction and upgrades. These omissions make it difficult to determine the timing, scope, and distribution of work, limiting the map's usefulness as a record of SERVS progress.

It is notable that Phase I of the SERVS project required only four new towers to be built, while the remaining phases call for the construction of an additional 78. At the LOIC meeting in July 2025, a Kentucky State Police official reported that only two towers were currently under construction for other phases.¹⁰² In the 7 years since funding began, only 4.8 percent of the planned new towers have been completed. At this pace, full buildout would take more than 30 years, by which time the technology would likely be outdated and require replacement.

Figure 3.E
Map Of SERVS Progress In Western Kentucky
As of September 11, 2025



Source: Brandon Marshall, statewide interoperability coordinator, Kentucky State Police. Meeting of the Legislative Oversight and Investigations Committee. Frankfort, Sept. 11, 2025. Testimony.

SERVS maps do not distinguish between completed and planned sites or show which locations have been acquired. Without timelines or progress data, legislators lack a clear view of construction sequencing and resource use.

Similar issues underpin the maps for remaining phases. None of the maps clearly separate completed new towers from those still under development, nor do they indicate which sites the state has already acquired versus those it still intends to acquire. The lack of this distinction makes it difficult to track progress in real time and leaves legislators and reviewers without an accurate picture of where resources are being allocated.

Additionally, the maps do not display or reference the timeline for any of the project phases. Without timelines, it is impossible to understand the sequencing of construction or to gauge whether work is ahead of or behind schedule. Providing an updated site list with progress with the maps would provide legislators a better understanding of progress on SERVS.

Recommendation 3.4

Recommendation 3.4

When Kentucky State Police provide updates on SERVS to the General Assembly, it should include a list of sites with information on progress toward procurement or construction along with whether the site was a preexisting state government site or was acquired from a private owner.

Resources Unavailable Or Not Utilized

Insufficient internal and external communications have impeded potential assistance. In interviews and data submissions discussing the SERVS land procurement process, there was no indication that KSP attempted to acquire additional assistance with property acquisition until the 2024 contracts, 4 years after initial contact with Division of Real Properties. KSP staff stated that it and the Finance Cabinet “discuss the project status and continue to look for opportunities to improve this process.” They also indicated that KSP and the Finance Cabinet meet weekly to discuss the project.¹⁰³ The agency could not provide documentation of these meetings, so there is no indication that these meetings were a sufficient resource to overcome the property acquisition issue.

The Kentucky Wireless Interoperability Executive Committee could have served as a resource or oversight, but it no longer appears active.

In theory, the Kentucky Wireless Interoperability Executive Committee (KWIEC) could have served as a resource or provided oversight of the project. KWIEC was “created to address communications interoperability” and to advise and make “recommendations regarding strategic wireless initiatives.”¹⁰⁴ The KWIEC chair, who is also the state chief information officer, and the Public Safety Working Group subcommittee is to provide resources and guidance as requested.¹⁰⁵ KWIEC’s membership also includes members of multiple cabinets and local groups, such as the League of Cities or Association of Counties, that could have provided advice or located resources.¹⁰⁶ In practice, the board does not appear to be active, with meeting minutes not being updated since 2018.¹⁰⁷ LOIC staff submitted a request to talk with KWIEC staff through its website in September 2025 but had not received a response as of October 9, 2025. KSP stated that KWIEC does not provide oversight of the project. The Justice and Public Safety

Cabinet stated that the Kentucky State Police has been in contact with KWIEC regarding the status of the project but provided no example documentation of the interactions.¹⁰⁸

Without a process to obtain additional assistance or a group to perform oversight, KSP risks encountering another obstacle to SERVS that could stall progress in the future. During the July 10, 2025 meeting of LOIC, KSP representatives indicated SERVS would need continual work for upgrades and maintenance after completion.¹⁰⁹ A process to resolve persistent roadblocks or a group that could identify resolutions may prevent future delays in service.

Recommendation 3.5

Recommendation 3.5

Kentucky State Police should develop a policy to seek additional help or resources when significant roadblocks prevent progress with SERVS.

Matter For Legislative Consideration 3.D

Matter For Legislative Consideration 3.D

The General Assembly may wish to consider designating a group to oversee SERVS, such as an existing legislative committee or a group of stakeholders and subject matter experts that could provide advice and resources.

As of late 2025, few local agencies were using SERVS because the required MOU was only recently finalized. The agreement sets equipment training and coordination requirements that may delay participation even where network infrastructure is complete.

SERVS Agreement Not Used Until September 2025. First responders must sign a memorandum of understanding (MOU) to use SERVS. As of August 20, 2025, the document was unofficial and in the process of legal review. By the end of September 2025, the MOU had been completed and sent to a county for review. KSP intended to add the county sheriff, police department, fire department, and emergency medical services to SERVS.¹¹⁰ Although the network has been completed in parts of the state, local first responder agencies are not using it. The MOU also has multiple requirements to use SERVS, so waiting to initiate the MOU will make agencies wait more time before they can use the system.

The MOU has an initial term of 5 years and is automatically renewed for additional 5-year terms unless one party decides not to renew the agreement. It also requires KSP to establish an authorized list of equipment that will be compatible with SERVS and to provide network management, including monitoring, maintenance, and repair of the system. KSP states that it will use reasonable efforts to maintain SERVS in good working order, and

will investigate and provide solutions in response to reports of system issues. The local agency is responsible for upgrading equipment to P25 compliant devices within 36 months of SERVS initiating operation. Local jurisdictions establish a communication liaison officer that coordinates access to the system, provides data to KSP for record keeping, provides after-hour emergency numbers, and attends advisory board meetings. Local jurisdictions cannot allow employees or volunteers to use the system until they have received adequate SERVS user training.

SERVS Survey Results Analysis

A statewide survey found strong interest in an interoperable system like SERVS, but limited communication between KSP and local agencies. LOIC received 160 responses from first responder representatives across Kentucky.

To gain a clearer understanding of the interest and knowledge of the Statewide Emergency Responder Voice System (SERVS), LOIC staff conducted a survey of multiple agencies across the state.^d The survey included questions about the SERVS project, concerns affected agencies might have with this project, and their current utilization of and need for an interoperable communication system. Generally, the survey showed that agencies are interested in a system like SERVS, but few agencies are communicating with KSP about the system.

Staff received 160 responses from individuals representing first responder agencies in Kentucky. Table 3.5 shows the makeup of the responses by agency type. The responses that chose *other* were asked to specify the agency or professional capacity in which they were affected by SERVS. The responses included retired, coroner, EMS/EMA director, corrections, county constable, regional hospital with EMS, and state EMS board.

^d The survey was distributed to agency heads through professional organizations: the Kentucky State Fraternal Order of Police, Kentucky Association of Chiefs of Police, Kentucky Sheriffs Association, Kentucky Fire Commission, and Kentucky Board of Emergency Medical Services.

Table 3.5
Agency Responses To Survey
August 18, 2025 To September 5, 2025

Agency Type	Number Of Responses
Law enforcement	64
Fire department	58
Emergency medical services	56
Emergency/incident management	10
Search and rescue	7
All others	10
Total agencies responding	160

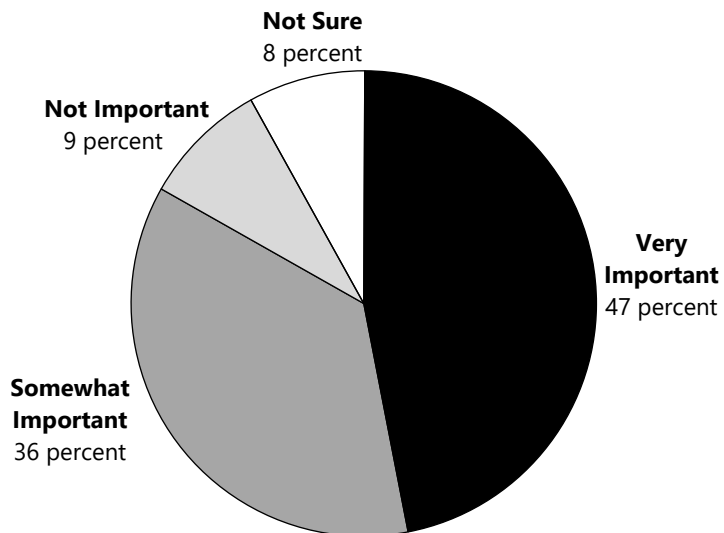
Note: Forty-six individuals answered for multiple types of agencies. Five responses were removed because they were incomplete or duplicates. Source: Analysis of 160 agency responses to Legislative Oversight staff survey that was open from August 18, 2025 to September 5, 2025.

Surveyed Agencies Are Interested In A System Like SERVS

Eighty-three percent of first responders surveyed said an interoperable radio system is important, yet few than one-third were aware of SERVS. This gap highlights limited outreach despite strong statewide interest.

Based on survey results, first responders are interested in an interoperable system like SERVS, but many are not aware of SERVS. Figure 3.F shows that almost half of respondents identified an interoperable radio system as being very important while another third of respondents believed it was somewhat important, for a total of 83 percent. Only 9 percent of respondents stated such a system was not important. Despite the interest, only 46 of the 160 respondents were aware of SERVS.

Figure 3.F
Agency Interest In An Interoperable Radio System



Source: Analysis of 160 agency responses to Legislative Oversight staff survey that was open from August 18, 2025 to September 5, 2025.

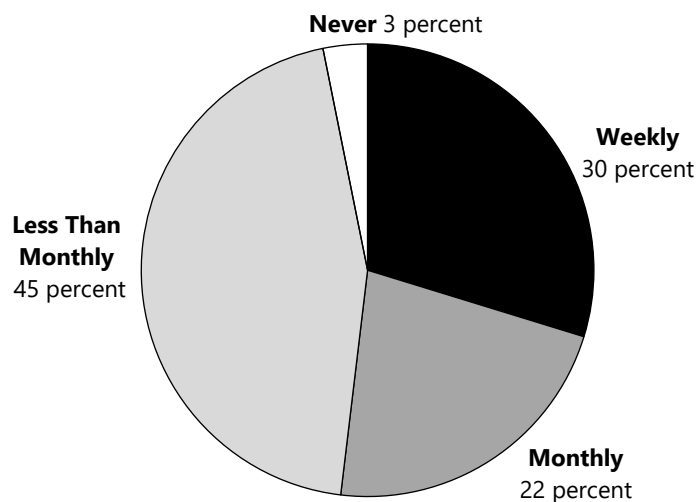
Of the 46 agencies aware of SERVS, few had engaged with KSP, but many wanted to be involved in planning. Most respondents believed SERVS could improve communication during multi-jurisdictional incidents, though several remained uncertain.

Of those 46, only 12 agencies indicated they were involved in discussions with KSP about the system; however, 23 of those agencies stated they wanted to be active participants in planning activities for SERVS. When asked if they would be interested in participating in SERVS, 22 representatives said they would be interested and 2 said they already participate, with an additional 18 stating they may be interested. When asked about whether they thought SERVS would improve their ability to communicate during multi-jurisdictional incidents, 14 agencies said they were very confident and 10 said they were somewhat confident. Only 4 agencies said they were not confident, with 11 agencies stating they were unsure and 7 agencies not responding to the question.

About half of surveyed agencies reported taking part in multi-agency responses weekly or monthly, showing frequent need for interoperable communication. Only a few agencies said they never participate, citing incompatible equipment or lack of coordination.

Surveyed agencies generally indicated they would use an interoperable radio system on a regular basis. Agencies were asked about how often they currently participate in multi-agency response incidents requiring interoperable communications. Figure 3.G illustrates the responses received. About half of respondents indicated they were involved in multi-agency responses weekly (30 percent) or monthly (22 percent). Only 3 percent of responses said they were never involved in multi-agency responses. Of the 5 responses that were never in that situation, one response stated that surrounding counties do not have radios compatible with their system while another said they were never invited to multi-agency responses and did not think local agencies could communicate on a single channel.

**Figure 3.G
 Current Frequency Of Multi-Agency Response Incidents
 Requiring Interoperable Communications**

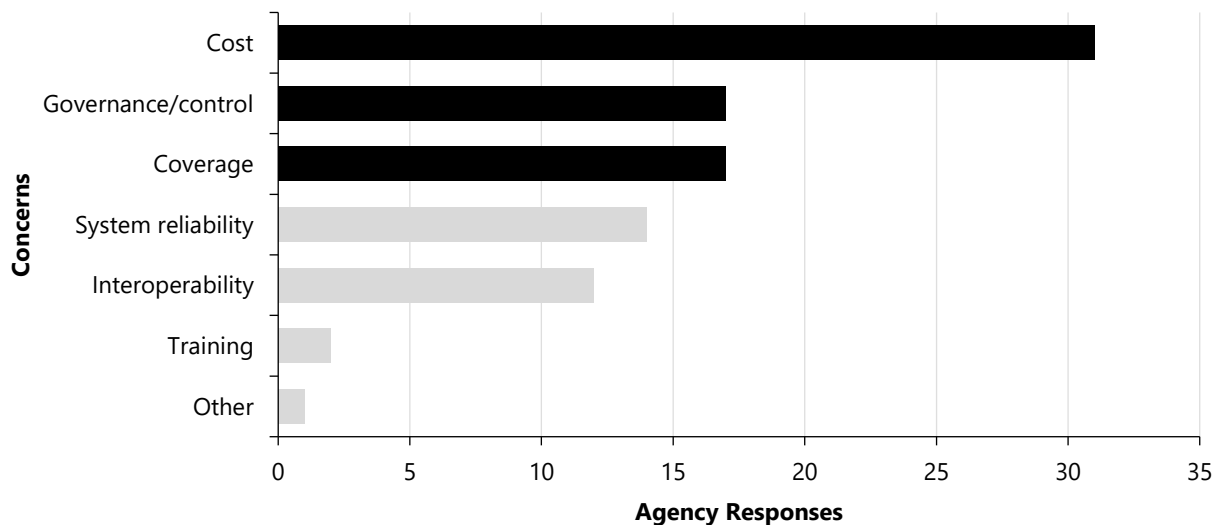


Source: Analysis of 160 agency responses to Legislative Oversight staff survey that was open from August 18, 2025 to September 5, 2025.

When asked about their main concerns with SERVS, most agencies cited cost, coverage, and governance or control. Only one respondent selected "other," noting concern about keeping their current system operational.

Agencies were also asked about their main concerns regarding the SERVS project. The survey allowed respondents to select up to three concerns among cost, coverage, training, interoperability, system reliability, governance/control, and other which they were asked to specify. Figure 3.H shows the distribution of responses. The main three concerns were cost, coverage, and governance or control. There was only one respondent who selected other, indicating they were concerned with ensuring the current system is operational.

Figure 3.H
Agencies' Main Concerns With SERVS



Note: Agencies could select up to three concerns.

Source: Analysis of 46 responses from agencies aware of SERVS, part of a larger set of 160 agency responses to Legislative Oversight staff survey that was open from August 18, 2025 to September 5, 2025.

Survey feedback shows that local agencies want more information and collaboration on SERVS. Many cited funding limits, lack of communication, and delays in access as barriers to participation.

Agencies were also given the opportunity to provide commentary on what is needed for SERVS to be successful. Of the 46 agencies aware of SERVS, 6 responses indicated that funding was going to be an issue with one agency stating that smaller first responder agencies do not have access to funds to purchase radios. Four agencies mentioned that more collaboration was needed, with one agency stating that their jail and fire department had received no information about SERVS. Four additional agencies said they wanted the system to be made available for use.

All respondents were allowed to indicate whether they had additional comments; 12 respondents provided information. Three

respondents complained about the amount of time needed to access the system, with one of these individuals stating they were told they could access the system 3 years ago and their radios are now out of warranty. Another individual said there were “too many rumors” regarding the system. Other comments involved the importance of a communication system, current systems having gaps in coverage, concerns about a narrower bandwidth, and concerns about increases in costs.

Given the results of the survey, KSP would likely benefit from greater communication with local first responders. Many agencies are active in multi-jurisdictional incidents or are actively interested in SERVS. Early communication with local first responders would allow them to provide feedback on how SERVS operates. Establishing a rapport with local agencies would also increase the likelihood that they will use SERVS and increase the value of the system. Lower levels of communication risks agencies creating their own networks and causing duplication, as well as agencies being less interested in the system due to concerns about operations.

Recommendation 3.6

Recommendation 3.6

As Kentucky State Police expand the SERVS network throughout Kentucky, it should communicate with more first responders to obtain feedback on procedures and generate interest in participating.

Appendix

Agency Responses To Report

Andy Beshear,
GOVERNOR



Keith L. Jackson,
SECRETARY

JUSTICE AND PUBLIC SAFETY CABINET

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Frankfort, Kentucky 40601 Phone:
(502) 564-7554 Fax: (502)
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October 28, 2025
Joel Thomas
Legislative Oversight and Investigations Committee
Legislative Research Commission
Capitol Annex, Room 462
Frankfort, KY 40601

Dear Mr. Thomas:

The draft Legislative Investigations & Oversight Committee (LOIC) report was received on the Statewide Emergency Responder Voice System (SERVS) capital project. You solicited agency feedback on any factual, technical, or contextual matters that may require clarification or correction prior to finalizing the draft for the committee. The following is a joint response from the Justice and Public Safety Cabinet and the Finance and Administration Cabinet.

Items to Be Corrected

Recommendation 3.1 and the information regarding prompt payments to a vendor and debt service payments - Pages ix and 26

There were no payments to the vendor that did not comply with the Commonwealth's prompt payment requirement. The draft report stated that some payments were 35 days past the invoice date. When the Kentucky State Police (KSP) initiates a Delivery Order (DO), Motorola responds with an invoice to ensure the invoice pricing matches the pricing on the DO and then initiates the delivery of goods or services. Per F AP 11-45-00, a penalty is only considered if an agency pays a vendor more than 30 working days after receipt of both satisfactory goods and services and satisfactory invoice. KSP processes a payment after final receipt of the products and services are confirmed.

The draft LOIC report questioned whether KRS 150.021(2) was implemented, where the Finance and Administration Cabinet assesses the Department of Fish and Wildlife Resources each fiscal year equal to 5 percent of the debt service. Those actions have taken place every year. These payments are processed between the Finance and Administration Cabinet and the Department of Fish and Wildlife Resources with assistance from the Office of the State Budget Director. The Office of the State Budget Director incorporates that assessment when budgeting for debt service payments.

Budget and Planning Issues - Page 19

The draft LOIC report stated that money from past budget cycles were "left idle." That is incorrect. The Commonwealth applies bond proceeds, which is the financing source budgeted for the SERVS project,

after expenditures have taken place. No bond funds have been left idle for this bond-funded project. That has been a longstanding fiscally responsible practice.

Comments on Payments -Page 20

This statement is incorrect. There are contracts and payments to other IT application vendors dating back to FY 2020, including NIT Data and the Commonwealth Office of Technology. Also, regarding the timing of land and right-of-way acquisitions, there have been payments to title attorneys, county clerk's offices, and valuation vendors dating back to FY 2020, and also occurring in 2021, 2022, 2024, and 2025.

Requests Without a Defined Plan for Use -Page 23

The draft LOIC report states, "... nearly half of appropriated funds remain unspent without a defined plan for use." That is incorrect. KSP included a specific plan for use of the requested funds for the SERVS project in each biennial budget capital project request. In each biennium, the Governor recommended the amounts, and the General Assembly enacted those requested amounts from the specific plans put forth by KSP.

Information and Responsibility across multiple agencies -Pages 31 and viii

The LOIC draft report states that information on contracts and expenditures is scattered across multiple agencies and maintained without a centralized ledger. The draft report also states that "There appears to be confusion over responsibility for the project." These statements reflect the lack of understanding in the draft LOIC report of the Commonwealth's method of accounting for capital projects. All of the project expenditures are recorded through a single capital fund account. The allotments for the capital project are subdivided into certain project components with responsibility allocated to the project's actors. There is no confusion over the responsibility for the project. The project is KSP's. The Finance and Administration Cabinet assists state agencies in providing certain services associated with hundreds of capital projects. For the SER VS project, the planning, purchase, and installation of equipment is performed by KSP, as well as the implementation of the new system, including testing, monitoring, and onboarding of users. The design and construction of towers, land acquisition and property lease administration, is performed by the Finance and Administration Cabinet, in service to KSP's specified needs. Each of the two agencies maintain the appropriate documentation regarding contracts, purchases, and payments.

KEWS and SERVS -Page 34

The draft LOIC report correctly states that the Kentucky Early Warning System (KEWS) is being modernized "as part of that effort," referring to the SER VS project. The report then goes on to say that the necessary intermingling of the two components of the project creates a challenge. The two components are part of the same capital project; they are not separate projects.

Complexity of SERVS Project -Page 37

The draft LOIC report states that the purchase of radios from the project established a delay between their purchase and their active use of the system. That is incorrect. The radios are currently in use for Phase I of the SERVS project and are compatible with the current system. They are not obsolete, nor were they purchased prematurely. The radio replacements were intended to be a part of the capital project's use.

Kentucky Wireless Interoperability Executive Committee- Pages xi and 41-42

The draft LOIC report states that the Committee "appears to be inactive." This is incorrect. KSP has been in contact with the Committee on the status of the project. Additionally, KSP regularly updates the Public Safety Working Group, the technical working group of the Committee that meets monthly.

Recommendation 3.A

Within the draft LOIC report's narrative for item 3.A, it states that, "it is also unclear why KSP is requesting additional funding in the next budget cycle and how it will spend the \$107 million that still remains." The KSP capital plan for 2026-2032, submitted in May 2025 to the Legislative Research Commission's Capital Planning Advisory Board includes four pages of specific information about what is being requested in this final phase of funding. This project was discussed at the Board's May 2025 meeting. The Board's staff summarized the provided information for the Board members reflecting the items being funded and the geographic region associated.

Clarification Items

Recommendation 2.1 - Kentucky Field Operations Guide

The draft LOIC report states that KSP should ensure that the Kentucky Field Operations Guide is reviewed and updated. The Guide was updated in December 2024 (version 2.0) but was not published to the Committee's website in a timely manner. That has been corrected.

Updated Count of Existing and New Sites - Page 13

The draft LOIC report states that "having an updated count...would have assisted legislators with understanding the scope and progress of the project". We agree this is useful and has been provided in documents to LOIC staff and the Committee members. The number of existing and new sites have been provided through testimony and presentations. KSP has provided the chart below in recent LOIC updates.

Project Tracking Items	Funded-Completed	Funded-In Process	Funded-Not Yet In Process	26-28 Request Items	All Items	Refer To SERVS Maps
Router/Switches/Network Upgrades	130		57		187	Phase III
DC Power Plants	18	24	62	45	149	Phase I, II, IIIA, & Closeout
Microwave Replacement	56	76	60		192	Phase III
Radio System Installation	65	24	35	41	165	Phase I, II, IIIA, & Closeout
Tower Construction	4	2	33	25	64	Phase I, II, IIIA & Closeout
Site Acquisition	10	54			64	Phase I, II, IIIA
Cores	2		2		4	Phase I & IIIA
Radio Dispatch Positions	70				70	Phase I
Mobile/Portable Radios	1890				1890	Phase 1

*As of 6,13,25

Budget and Planning Issues - Page 19 and Major Conclusion bullet 3, Page vii

The draft LOIC report states that there was a disconnect between appropriations, spending and long-term planning. KSP has presented regularly to legislative committees on this project. Additionally, site maps were included in most presentations, with one prior example being from a 2021 committee meeting (link to LRC website below), indicating that the phases of the project are geographic in nature, moving from west to east across the state, and different components of each phase may be in progress simultaneously. Current maps have been provided to LOIC in monthly updates. There are multiple components to this complex capital project. Those components have been described in testimony and portrayed in KSP's capital plans and capital budget requests.

[Nov 16 2021 KSP Erner Radio System Repl Update-Exec Summary.pdf](#)

Below is a chart showing the various components of the project, the current project budget, expenditures to-date by component and the elements comprising the 2026-28 budget request amounts. Approximately 61% of the project funds have been expended, instead of the 49.5% figure included in the draft.

	Current Project Budget 216,359,000	ITD Expenditures thru 10.22.25 131,069,663	Current Project Budget Less Expenditures 85,289,337	Capital Plan Request 26-28 107,427,000	Total Project Budget With Requested 323,786,000
B210	Project Budget Categories				
E701	Consulting, Architectural, Engineering \$	5,021,000	2,436,787	2,584,213	8,270,000
E703	General Construction \$	84,108,590	15,593,717	68,514,873	139,454,590
E710	Computer Equipment \$	1,905,598	1,533,267	372,332	1,905,598
E713	Land/Right Of Way \$	2,542,000	740,000	1,802,000	2,542,000
E718	Site Acquisition \$	2,121,700	89,886	2,031,814	2,121,700
E724	Special Mobile Equipment \$	118,716,435	109,480,238	9,236,197	166,810,435
E812	Project Management \$	1,943,677	1,195,768	747,909	2,664,677
	Total	216,359,000	131,069,663	85,289,337	323,786,000

Major Conclusion - Bullet 4, Page vii

The draft LOIC report states that information to the legislature has been unclear about the scope and progress of the SERVS project. Information provided by KSP was intended to fully describe the scope and progress of the project, and KSP has endeavored to better explain this complex project. The statement that "There does not appear to be intentional duplicity..." is a back-handed compliment that does not belong in this professional report and is not supported by specific evidence.

Major Conclusion - Bullet 5, Page vii

The draft LOIC report accurately states that acquisition of real property is a significant barrier for the project, but it points only to a contract to assist with the land acquisition in 2025. The KSP and the Finance and Administration Cabinet's Division of Real Property have collaborated since 2020 on this component of the project. We do expect the contract to speed up the process of identifying tower sites, their landowners, and all of the associated work necessary to engage in either acquisition or leasing.

An attached Exhibit is provided showing a timeline of key milestones in this area.

Major Conclusion - Bullet 7, Pages viii, ix, and part of 3.A

The draft LOIC report states that "Extensive use of master agreements has resulted in minimal oversight and review of expenditures." The draft LOIC report also states on page ix that, "Having a multi-million-dollar infrastructure project entirely done through master agreements results in lower oversight and prevents potential negotiations that can be associated with larger projects." On page x, "...but a difficult procurement process opens opportunities for funds to be inadvertently wasted or incorrectly tracked."

We do not agree with these statements. Master Agreements are competitively procured and meet all KRS 45A Model Procurement Code requirements. These requirements are designed to provide the appropriate controls. The Finance and Administration Cabinet's Office of Procurement Services (OPS) ensures that any Master Agreement meets the statute's high standards. The use of Master Agreements is an efficient and effective method of procuring goods and services.



The National Association of State Procurement Officials (NASPO), with Washington serving as the lead state, issued RFP #00318 - Public Safety Communication Products, Services, and Solutions on November 16, 2020, with 43 competing companies covering 12 different areas. Awards were finalized in 2021.

NASPO-derived contracts, including these Master Agreements, meet KRS 45A Model Procurement Code requirements. The Kentucky Master Agreement with Motorola was established under this competitively bid NASPO contract. These Master Agreements were competitively solicited at the national level, with multiple states participating to ensure cost efficiency and reduced administrative overhead. Because the RFP process was completed through NASPO, Kentucky was able to leverage the results to achieve favorable pricing and terms without conducting a separate solicitation. OPS encourages all Executive Branch Cabinets to issue delivery orders under existing Master Agreements to ensure proper documentation for audit purposes.

The draft LOIC report statement that "...a difficult procurement process opens opportunities for funds to be inadvertently wasted or incorrectly tracked." is included without any basis. The procurement process in use for the SERVS project is the same rigorous process applied to all projects. Describing it as "difficult" may reflect a misunderstanding of the standard procedures rather than an inherent flaw in the process itself. In other words, the process is designed to ensure accountability and proper tracking of funds, and it is not the source of any potential waste. We believe it is important to focus on accurate understanding of these procedures rather than assumptions about their complexity.

Recommendation 3.2 - Regulations to Consult with the Division of Real Properties Acknowledging the unique nature of the SERVS project, the Division of Real Properties worked with KSP on a customized approach tailored to this project. Almost all other capital projects are site specific and do not have to contend with multiple site acquisitions or leases. No new regulations are needed.

In conclusion, we appreciate the efforts made in preparing this draft LOIC report and the opportunity to identify items that are in error, to clarify with additional information, and to express our stance on specific items in the report.

If you need further information, please contact our Offices.

Sincerely,



Keith Jackson, Secretary
Justice and Public Safety Cabinet



Holly Johnson, Secretary
Finance and Administration Cabinet

Exhibit Reflecting Collaboration with the Division of Real Property (DRP)

2020

- KSP began discussions with DRP regarding tower site leases in Webster, Ballard, Trigg, and Muhlenberg Counties.
- By the end of the year, DRP executed agreements for all four sites.
- In August, DRP issued a delegation of authority for KSP to collect property information.

2021

- Final leases for the four tower sites were completed.
- In August, DRP sent letters to property owners using updated contact information.
- Several lessors questioned compensation, but funds were unavailable.

2022

- Discussions began with Hart County officials regarding a privately owned tower site.
- DRP assisted in drafting a Memorandum of Agreement.

2023

- In October, DRP provided KSP with a comprehensive list of state-owned property from DRP.
- Discussions and collaborations were held with KYTC, KDFWR, and COT to evaluate potential locations and compile GIS data.
- Interagency lease agreements were successfully established with the Department of Parks for sites at Barren River and Dale Hollow State Parks.
- KSP and DRP discussed creating an RFP for vendor assistance due to extensive workload for both agencies.

2024

- In May, a formal RFP was issued for qualified vendors to assist with property identification and acquisition.
- DRP established a workflow system for vendor tasks. Vendors began contacting property owners and proposing primary and alternate greenfield sites.
- KSP and DRP jointly developed additional background criteria for site selection.
- In December, a contract was signed for the purchase of the Hart County tower site from the County.

2025

- In the spring, the purchase of the Hart County tower site was finalized.
- KSP continues to work with KYTC to secure additional sites.
- KDFWR indicated its properties are unsuitable due to restrictions.
- KSP and DRP continue to collaborate to refine the process and manage the volume of site information.
- KSP has access to vendor bids and documentation.

Ongoing

- Vendors assist in collecting data and contacting property owners for new greenfield sites. After a site is selected by KSP, the Vendors are contracted to proceed with acquisition steps.
- Vendors are contract to complete steps for lease renewal sites, including negotiating lease renewals.
- KSP and DRP collaborate on managing vendor submissions and refining the process.

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