
Title **0068** 02/01/2021

by **Abby Stockebrand** in **Public Comment** id. 19082647

111 Old Mill Lane
P.O. Box
Buhler, Kansas
67522
Kansas
United States
6204740618
abbys@ideatek.com

Original Submission 02/01/2021

Please provide your name: **Jade Piros de Carvalho**

Please provide your address: **P.O. Box 407
Buhler
Kansas
67522
US**

Please provide a phone number: **620-200-1167**

Please provide your email contact: **jadepiros@ideatek.com**

Are you responding on behalf of an organization? **Yes**

Please provide the name of the organization and address for which you are submitting comments: **IdeaTek Telcom, 111 Old Mill Ln, Buhler, KS 67522**

Which of the following best describes you?
(Check all that apply) **Internet provider in proposed service area**

I am providing comments related to the following application (choose one):

KwiKom Communications - Reno County

I am submitting comments to express

Concerns regarding a project

I am sharing concerns the project:

**Proposes to serve an area that already has service
Proposes service to an area in which construction is already underway**

Please provide your comments in the text box below.

IdeaTek submits the attached information in response to KwiKom's Reno County proposal to the January 2021 Broadband Acceleration Grant. This application should be fully rejected due to its duplicative funding status. Included in the packet is proprietary mapping and we request it remain confidential.

Please provide supporting documents relative to your comments. Please submit multiple files as a ZIP file.

[CONFIDENTIAL-_KS_BAG_Public_Comment_-_KwiKom_Reno_Co..zip](#)

Abby Stockebrand

By submitting this form for public comment and evidence to support your comment, you are accepting responsibility for the accuracy of the information submitted and that it is true and correct to the best of your knowledge. You agree to be contacted by the Kansas Office of Broadband Development, Kansas Department of Commerce should the need arise. Furthermore, by making this submission, you understand that Kansas Department of Commerce and the Office of Broadband Development reserve the right to publicly publish your comment and evidence provided. Falsification of information will result in rejection of future public comment submissions and could result legal action. Please type your name and today's date in the text box below.

Title **0029** 01/25/2021
by **Troy Smith** in **Public Comment** id. 19000201
109 N Christian
Moundridge, Kansas
67107
Kansas
United States
6203452831
tsmith@mtelco.net

Original Submission 01/25/2021

Please provide your name: **Troy Smith**

Please provide your address: **109 N Christian
Moundridge
Kansas
67107
US**

Please provide a phone number: **6203452831**

Please provide your email contact: **tsmith@mtelco.net**

Are you responding on behalf of an organization? **Yes**

Please provide the name of the organization and address for which you are submitting comments: **Moundridge Telephone Co.**

Which of the following best describes you?
(Check all that apply) **Internet provider in proposed service area**

I am providing comments related to the following application (choose one): **KwiKom Communications - Reno County**

I am submitting
comments to express

Concerns regarding a project

I am sharing
concerns the project:

Proposes to serve an area that already has service
Proposes to serve an area likely to be served without grant funds because plans are in place to serve this area, although construction has not yet begun

Please provide your
comments in the text
box below.

Moundridge Telephone Co. is an ILEC serving the cities of Moundridge, Goessel, and rural areas in McPherson, Harvey, and Marion Counties. The area in question for grant applicant KwiKom Communications shows wireless coverage within the Western portion of the exchange boundary of Moundridge Telephone. Moundridge Telephone elected to participate in the ACAM program, which is a federally subsidized program. The information below is from the USAC website giving a brief overview of the ACAM program:

ACAM

Established by the 2016 Rate-of-Return Reform Order, the Alternative Connect America Cost Model (ACAM) provides funding to rate-of-return carriers that voluntarily elected to transition to a new cost model for calculating High Cost support in exchange for meeting defined broadband build-out obligations. (Carriers that elected ACAM support following the 2016 order, but did not elect the new Revised ACAM offer, continue to participate in the original ACAM program, or ACAM I.) ACAM models the forward-looking economic costs of deploying a high-speed network and delivering broadband service. Carriers that elected this option receive predictable monthly payments to provide voice and broadband service to all funded locations over the program's 10-year support term (2017-2026).

Service Requirements

Carriers that elected ACAM funding must meet the deployment obligations published in the Public Notice authorizing them to receive A-CAM support. These deployment obligations are based on the following service requirements:

Maintain existing voice and broadband service and offer broadband speeds of at least 10 Mbps downstream/1 Mbps upstream (10/1 Mbps) to a number of eligible locations equal to the number of fully-funded locations (locations for which the carrier receives support for the full cost of build-out)

Offer broadband speeds of at least 25/3 Mbps to a number of eligible locations equal to a certain percentage of fully funded locations depending on the population density of the carrier's service area. For a density threshold of 10 or more locations per square mile, offer speeds of at least 25/3 Mbps to a number of eligible locations equal to at least 75 percent of fully-funded locations by the end of 2026

Deployment Requirements

Carriers must offer at least one commercial voice and one commercial broadband service that meet the relevant service requirements, and must meet the following broadband deployment

milestones:

Deploy at least 10/1 Mbps service to the number of eligible locations equal to at least 40 percent of fully funded locations by the end of year 4 (2020)

Deploy at least 10/1 Mbps service to the number of eligible locations equal to at least 50 percent of fully funded locations by the end of year 5 (2021)

Deploy at least 10/1 Mbps service to the number of eligible locations equal to at least 60 percent of fully funded locations by the end of year 6 (2022)

Deploy at least 10/1 Mbps service to the number of eligible locations equal to at least 70 percent of fully funded locations by the end of year 7 (2023)

Deploy at least 10/1 Mbps service to the number of eligible locations equal to at least 80 percent of fully funded locations by the end of year 8 (2024)

Deploy at least 10/1 Mbps service to the number of eligible locations equal to at least 90 percent of fully funded locations by the end of year 9 (2025)

Deploy at least 10/1 Mbps service to the number of eligible locations equal to at least 100 percent of fully funded locations, in addition to meeting final deployment obligations to deploy 25/3 Mbps and 4/1 Mbps by the end of year 10 (2026)

Due to the fact that Moundridge Telephone receives federal funding to deploy 25/3 speeds within their exchange, the grant proposed by KwiKom should be excluded from all areas within the Moundridge Telephone exchange boundary. Otherwise, KwiKom would be duplicating “overbuilding with grant funding” areas that are already receiving service or are committed and/or contracted for ACAM locations. Also note, areas that are noted in the red outlined areas in the attached documents area have been built or will be completed by 2021. Moundridge Telephone has submitted a grant proposal to exceed the 25/3 speeds for "edge out" building while we are constructing the 2021 build. This grant proposal is outside of our exchange boundary, and therefore not eligible for ACAM federal funding.

Please provide supporting documents relative to your comments. Please submit multiple files as a ZIP file.

[KwiKom_western_Moundridge_Telephone_boundary.png.docx](#)

Troy Smith 1.25.2021

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