

Title **0194** 09/08/2022

by **Eric Ryker** in **Capital Projects Fund (CPF)** id. 32046081
Broadband Infrastructure Program: Phase Two
Public Comment Form

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Original Submission 09/08/2022

Please provide name: **Eric Ryker**

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Please provide your phone number: **+16209301000**

Please provide your email contact: **eryker@sctelcom.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: **SCTELCOM**

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
(comments must be
filed individually for
each project):

SCTELCOM_HarperCo_CPF

I am submitting
comments to
express:

Support for a project

Please provide your comments in the text box below:

On August 31, 2022 the FCC announced that they are “Ready to Authorize” various RDOF awards including AMG/NextLink’s application for a wireless deployment in Harper County. It is unfortunate that the FCC made this announcement 21 months after the 904 auction closed and after the Capital Project Fund application submission window closed. It is also unfortunate that the technology proposed, and in this case already deployed, by the awardee for Harper County is an inferior product that will provide an inferior customer experience.

SCTELCOM in coordination with KanOkla Networks submitted Capital Project Fund (CPF) applications to overbuild the remainder of the AT&T exchanges in Harper County (Anthony, Attica, and Harper) with fiber-to-the-premise technology. Below are several reasons why we feel that the Kansas Department of Commerce should support the applications of SCTELCOM and KanOkla Networks and all other applicants who are in a similar situation with plans to deploy fiber-to-the-premise technology.

- 1) NextLink’s maximum service level offering in Harper County is 100/10Mbps, which does not meet the minimal service level requirement of the CPF program. Please see the attached documentation supporting this statement.**
- 2) SCTELCOM’s initial service offering for its CPF customers will be 2.5/2.5Mbps. SCTELCOM does not feel that 100/10Mbps is sufficient for today’s users, especially if we experience another pandemic shutdown and education and business is conducted remotely.**
- 3) Wireless is not a viable and scalable long-term technology due to line-of-sight requirements, its tendency to fail in inclement weather, and the limited amount of spectrum available for this purpose.**
- 4) Fiber is a future safe network infrastructure that is readily scalable and capable of practically unlimited bandwidth.**
- 5) The FCC’s approval of wireless technology for RDOF awards is short-sighted, especially after having witnessed wirelesses inadequacies during the pandemic shutdowns of 2020.**
- 6) Finally, it would be imprudent to take on a project of this scope with this level of rurality without financial assistance available from programs like CPF.**

We appreciate every consideration the Office of Broadband Development gives to this appeal and the applications of SCTELCOM and KanOkla Networks.

Upload supporting documentation - multiple files should be submitted as a .ZIP file.

[SCTELCOM_HarperCo_CPF_-_Nextlink_Service_Research.xlsx](#)

[SCTELCOM_HarperCo_CPF_Nextlink_Service_Pics.zip](#)

By submitting the Public Comment Form (the "Form") and any supporting evidence, you attest

Eric Ryker - September 8, 2022

that all information furnished is true and accurate to the best of your knowledge and that any attachments are free of malware or viruses. You also acknowledge that falsifying any information could result in legal action against you and will bar you from submitting public comments to this web site in the future. You authorize the Kansas Office of Broadband Development, Kansas Department of Commerce (KOBD) to contact you if further information is needed. You expressly acknowledge and consent to some personal information, including your name, address, phone, e-mail, organization you represent, and comments, being posted for public view on the Kansas Department of Commerce web site at www.kansascommerce.gov. The KOBD will use its best efforts to redact any personal identifiable information outside of the above that is not considered in the public domain. By typing your name and date and by submitting the Form,

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