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id. 32047109

by **Kasey Krueger** in **Capital Projects Fund (CPF) Broadband Infrastructure Program: Phase Two Public Comment Form**

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Original Submission

09/08/2022

Please provide name:	**Kasey Krueger**
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Please provide your phone number:	**+16203567162**
Please provide your email contact:	**kasey.krueger@pioncomm.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:	**PGB Fiber, LLC dba Pioneer Communications**
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):	**Cox Communications_Finney G23**
I am submitting comments to express:	**Concerns regarding a project**
I am sharing concerns about 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:

PGB Fiber, LLC hereby respectfully submits public comments to portions of Cox Communications "Finney County G23" project proposal for the Kansas Broadband Capital Projects Fund grant.

We have several concerns with Cox Communications' proposal using CPF grant funding to construct a fiber network in and around Garden City, specifically on east HWY 50 (see supporting document Exhibit 1). Based on the public maps available, their proposed route includes over 10 miles of mainline for only a handful of locations passed. The argument can be made that Cox is utilizing the CPF grant to extend their mainline network, which is not in accordance with the CPF grant goals.

A large portion of Cox's proposed route along east HWY 50 duplicates and overlaps a network previously built by PGB Fiber with CARES CERG funding (see supporting document Exhibit 2, 3, & 5). Cox's proposal would provide redundant service to the existing PGB Fiber network which is currently capable of 1Gbps/1Gbps speeds with scalability to 10 Gbps/ 10 Gbps speeds in the future.

In addition, Cox's proposal includes a portion of a 1.5 mi route on S Old HWY 83 built by PGB Fiber using ARPA funding that connected a new law enforcement training facility for the City of Garden City completed in March of 2022. Once again, their request is a duplication of public dollars spent (see exhibit 4 & 7). PGB Fiber has completed the mainline and connection to the law enforcement training facility and is currently in the staking phase of connecting all inhabitable locations passed along this route. A contractor has been secured and we plan to have this area connected to a 1Gbps/ 1Gbps network scalable to 10Gbps/ 10Gbps in early 2023.

While PGB Fiber respects Cox Communications' effort to provide service for residents of rural Southwest Kansas, we do not believe that the goals of the CPF grant program to serve the unserved are met by overbuilding existing infrastructure already funded by taxpayer dollars. Please do not hesitate to contact us should you have any questions or require any additional supporting documentation.

Attached are supporting documents for your evaluation that include:
- **Exhibit 1 – Areas of concern**
- **Exhibit 2, 3, 5, & 6 – Cox/ PGB Fiber overlap map; E HWY 50**
- **Exhibit 4 & 7 – Cox/ PGB Fiber overlap map; S Old HWY 83**

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

PGB_Fiber_CoxFinney_Documents.zip

By submitting the Public Comment Form (the "Form")

Kasey Krueger 9/8/2022

and any supporting evidence, you attest 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, you acknowledge, authorize, and consent to this Public Comment Privacy & Acknowledgments.