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id. 32050463

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:	**+16203563211**
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:	**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**

Please provide your comments in the text box below:

Pioneer Communications 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 significant concerns about Cox Communications' proposal to use CPF grant funds to overbuild Pioneer Communications network in the Holcomb area (see exhibit 1). Pioneer Communications owns and operates a coaxial network in Holcomb, KS and has been providing service to the area since the mid-1990's. In 2019, the Holcomb network was upgraded to a DOCSIS 3.0 network bringing 500Mbps/ 25 Mbps capability. In April 2022, Pioneer Communications ordered equipment to upgrade the Holcomb network to a DOCSIS 3.1 network allowing speed capabilities of 1Gbps/ 1Gbps.

Based on the public maps available in the CPF application, it appears that Cox proposes to overbuild approximately 100 Holcomb locations that are currently served by Pioneer Communications and have current network capable of 500Mbps/25Mbps (see exhibits 2 & 3) with 1 Gbps/ 1 Gbps capability in October 2022 (see exhibit 4).

Attached is documentation showing the overlapping network areas, speed tests, technical data pertaining to the capabilities of the current network, as well as a summary of equipment currently installed and equipment to be installed in the next 45 days.

While Pioneer Communications respects Cox Communications' effort to provide service for residents of rural Southwest Kansas, we do not believe that overbuilding a current robust network meets the goals of the CPF grant program to serve the unserved are met by overbuilding existing infrastructure. 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 – Area of concern**
- **Exhibit 2 – Pioneer Communications network & overlap**
- **Exhibit 3– Proof of current 500/25Mbps capability**
- **Exhibit 4 – Proof of 1Gbps/ 1Gbps capability in the near future**
- **Exhibit 5 – Current services offered**

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

Cox_Holcomb_Pioneer_Communications_Comments.zip

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

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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.