

| | | |
|-------|--|--------------|
| Title | 0104 | 09/29/2022 |
| | by Leah Johnson in Capital Projects Fund (CPF) Broadband Infrastructure Program: Phase Two Applicant Response Form | id. 32691496 |
| | 120 E. Chestnut St. PO Box 250 Troy, Kansas 66087 United States 785-985-2235 leah.johnson@dpcountyks.com | |

| | |
|----------------------------|------------|
| Original Submission | 09/29/2022 |
|----------------------------|------------|

| | |
|---|---|
| Please provide your name: | Leah Johnson |
| Please provide your address: | 120 E. Chestnut PO Box 250 Troy KS 66087 US |
| Please provide a phone number: | +17859852235 |
| Please provide your email address: | economic.development@dpcountyks.com |
| I am providing response comments related to the following application (choose one): | DoniphanCounty_Area01 |
| I am responding to the concern that this project: | Other |
| Please describe: | AMG Technology Kansas (dba Nextlink) submitted a challenge to the DoniphanCounty_Area01 claiming CAF and RDOF reverse auction awards from the FCC for the proposed grant area. |
| Please provide your response to the public comments received in the text | Doniphan County submitted the Doniphan County Area 01 to the Kansas Broadband Office Capital Project Fund grant as part of a four-phase plan to expand fiber broadband technology throughout the entirety of Doniphan County. We have partnered with local ISP |

box below:

Rainbow Communications who already has proven quality fiber broadband service to more than a third of Doniphan County. We have also partnered with the Iowa Tribe of Kansas and Nebraska as they too want more area in Doniphan County to be covered with fiber broadband service to reach their tribal members' residences and businesses.

The public commit submitted by AMG/Nextlink to our grant application does not take into consideration the following facts: wireless solutions have been tried in this area before by local providers and previously awarded CAF and RDOF recipients with unreliable results; people in the proposed areas have stated via google surveys, written testimonials and Ookla data speed tests that they have subpar internet service and want fast reliable fiber service. This data collected by residents is in the areas FCC maps claim are served; however, the needs of this area would be best served by the tested and proven solutions that were proposed in our original grant submission.

Additionally, because AMG/Nextlink is not a local company, they truly do not understand the challenges of building broadband solutions in our area due to the rocky bluffs, hills and arboreous terrain that covers Doniphan County. It is hard to really understand on paper, but our terrain really inhibits wireless solutions from working here. Even if a ridiculously significant number of wireless towers were to be built here, due to the proximity of a national guard airport, agricultural value of the land, tree and hill obstructions and above average amounts of rainfall, they would still prove to be an inconsistent service on an oversubscribed network, let alone be financially wasteful, environmentally and technologically unsustainable and an unsightly burden on tourism.

Furthermore, AMG/Nextlink is proposing fixed wireless speeds of 100/20. Other wireless companies in the county already claim to have that kind of service available in the area and local testimonials by residents who pay for service from different companies are reporting via surveys and Ookla speed tests that they are in fact not receiving that service they are paying a premium for. Our grant is proposing fiber broadband technology with 10G XGS PON standard fiber to the premise. This technology is future proof providing Gigabit service to all proposed locations without limitations due to loop lengths. On the homepage of the Kansas Department of Commerce Office of Broadband's website the first sentence description of the Capital Project Fund: Broadband Infrastructure Program reads, "The Capital Project Fund program was developed to bring broadband infrastructure that will deliver speeds that meet or exceed symmetrical speeds of 100 Mbps to unserved areas across Kansas." AMG/Nextlink is not proposing to meet or exceed symmetrical speeds of 100Mbps. And in Doniphan County, only fiber broadband technology can accomplish that.

Finally, from attached maps from both our grant, AMG/Nextlink's challenge and our rebuttal comments, you can see there is not a

significant overlap. The minor overlapping is necessary to make available technology to eventually reach the other non-RDOF areas nearby because fiber broadband cannot “spot serve” as it needs to connect back to an established fiber network, for instance Rainbow Communications’ already existent infrastructure nearby.

We humbly ask you to consider all the documents submitted and to allow us, with our local partnerships, to expand fiber broadband technology to the proposed areas and eventually to the entirety of Doniphan County.

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

[Doniphan_County___CPF___Rebuttal_Comments.zip](#)

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.

Leah Johnson 9/29/22