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Title **0030** 09/05/2023  
by **Stephen Duerst** in **BEAD Initial Plan, Volume 1 Public Comment Form** id. 43961223  
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## Original Submission 09/05/2023

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Please provide name **Stephen Duerst**

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Please provide address (Not required) n/a

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Please provide email **stephen@federicoduerst.com**

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Please provide phone number (not required) n/a

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

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Organizational affiliation (If applicable) **Kansas Cable Telecommunications Association (KCTA)**

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**The Kansas Office of Broadband Development (KOBD) is in the process of developing its BEAD Initial Proposal as required by the NTIA. This initial plan is divided into Volume 1 and Volume 2. Volume 1 includes initial identification of unserved and underserved locations, definition of community anchor institutions, proposed pre-challenge process location modifications, and the model challenge process. Please use this link to review the entire Initial Proposal Volume 1 document, and feedback on Volume 1 will be captured in the text boxes below. The comment portal will be open from August 1, 2023 through August 30, 2023. KOBD will then review all feedback and submit the Initial Proposal to the NTIA. To access a full copy of Volume 1 of the BEAD Initial Proposal along with accompanying documents, please use the links below:**  
**<https://www.kansascommerce.gov/officeofbroadbanddevelopment/broadband-equity-access-and-deployment/>**

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I am responding to comments related to the following Volume 1 requirements **Requirement 7: Detailed BEAD challenge process**

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Comments relating to  
Requirement 7:  
Detailed BEAD  
challenge process

**The Kansas Cable Telecommunications Association (KCTA) appreciates the opportunity to respond to the Vol. 1 changes already adopted by the Kansas Office of Broadband Development (KOBD). Since most of our feedback has yet to be addressed, KCTA would like to reiterate the targeted modifications recommended in our comments submitted on August 28th and urge KOBD to adopt the changes proposed therein.**

**Moreover, the KCTA strongly urges KOBD to reconsider its proposed decision to limit the rebuttal period to 14 days. This formal shortening of the rebuttal period will significantly hinder the ability of providers to respond to challenges, which as described in detail in KCTA's comments could lead to inaccuracies and inefficiencies in the program.**

**Additionally, if KOBD is going to follow the NTIA Challenge Process, we request that they incorporate the final version of the process.**

**These targeted changes are a necessary step towards ensuring Kansas' BEAD allocation is spent effectively.**

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**Stephen Duerst on behalf of the Kansas Cable Telecommunications Association (KCTA)**

By submitting the Public Comment Form (the "Form") 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](http://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.

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