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by **Jim Jamison** in **BEAD Initial Plan, Volume 1 Public Comment Form** id. 43962068

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Original Submission

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

Organizational affiliation (If applicable) **AT&T**

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/>

I am responding to comments related to the following Volume 1 requirements

Requirement 7: Detailed BEAD challenge process

Comments relating to Requirement 7: Detailed BEAD challenge process

AT&T Kansas offers the following comments for consideration on the Broadband Equity, Access, and Deployment Program (BEAD) Initial Proposal (BEAD-IP) Volume 1 proposed by the Kansas Office of Broadband Development (KOBD).

As an established broadband internet access provider in Kansas that is leading the nation's largest fiber build to homes in the U.S., we are keenly aware of the importance of broadband access to the economy, education, healthcare, and more. We share the State's interest in developing a program that fairly and rationally allocates the state's BEAD funding to maximize broadband connectivity throughout the state.

As outlined in the BEAD Notice of Funding Opportunity (NOFO), states are encouraged to develop a transparent, evidence-based, fair and expeditious challenge process under which a local government, nonprofit or broadband service provider can challenge the set of locations eligible for BEAD funding or locations considered as served as determined by the state in the BEAD-IP . States may elect to adopt the National Telecommunications and Information Administration (NTIA)'s Model Challenge Process to meet NTIA's requirements and expedite the approval process.

AT&T supports the fact that the State has adopted much of the guidance and requirements outlined in the Initial Proposal Guidance document for the BEAD-IP Volume 1 since most of it is derived from the NTIA BEAD Challenge Policy Notice and the NTIA BEAD Model Challenge Process. Utilizing the NTIA BEAD Model Challenge Process will provide the State with the necessary flexibility to adopt different modules for speed test and area challenge requirements and at the same time help the State in designing a robust and comprehensive challenge process. However, as noted in the NTIA Policy Notice, states are encouraged to consider adopting longer submission and rebuttal windows and NTIA strongly recommends keeping both the challenge submission window and rebuttal window open for at least 30 days . Based on that guidance, AT&T recommends that the timeline for the rebuttal phase be kept open for the maximum period of at least 30 days to allow providers sufficient time to submit their response. AT&T acknowledges the importance and complexity of the work the KOBD is undertaking to implement the BEAD Program in Kansas. We appreciate the opportunity to offer comments and recommendations and we look forward to continued opportunities to work collaboratively with KOBD to implement this critically important program to bring broadband to unserved and underserved Kansans.

James Jamison

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. 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.
