
Title **0002** 10/30/2023
by **Jill Kuehny** in **Kansas BEAD Volume 2 Public comment** id. 44545339
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Are you filing a comment on behalf of an organization? Yes

Which organization are filing on behalf of? KanOkla Networks

Please indicate which sections of volume 2 you are responding to:
Requirement 1: Objectives
Requirement 8: Subgrantee Selection process
Requirement 15: Climate assessment
Requirement 9: Non-Deployment Activities

Please provide your response to Requirement 1: Objectives

Objective 1: The two goals of prioritizing unserved, high-cost, and rural locations and understanding and mitigating the localized barriers to deployment are at odds with the Affordability section. Prioritizing unserved, rural areas which are sparser which makes them high cost, which makes them difficult for a business plan to work, is why BEAD was created. For these higher cost areas, either the price point will need to also be higher or the grant will need to be higher to make sense. These areas would have been served with fiber 10 years ago if it weren't for these 2 issues. The Affordability prices are too low and do not reconcile with the goal of serving 100% of the high cost, rural, unserved areas and prioritizing fiber optic. \$90 for a symmetric gig favors nationwide carriers with high numbers of subscribers to spread a lower price point over. The nationwide carriers are who served these areas 10 years ago and chose not to invest in improved infrastructure. To favor these nationwide carriers in these goals prevents the neighboring community-based providers from participating. This is in direct opposition to the goal of mitigating the localized barriers to deployment.

Objective 4: Bravo! Where you live is should not be a determinant of how you participate in the digital economy. 98 of 105 counties are considered rural. There is a reason they are not served. Fiber is a priority, costly up front, but lower cost than other technologies over 30-40 years. However Objective 2 to allocate 25% to non-fiber technologies does not support the overall goal of innovative solutions and "future proof" technologies. The cost of fixed wireless over 20 years is higher annual costs and higher maintenance expense which causes rates to be higher than fiber optic. The Affordability pricing for Fixed Wireless does not make line up with these facts. We will be shortchanging up to 25% of our state by not finding a way to bring fiber to every location.

Please provide your response to Requirement 8: Subgrantee Selection Process

Defining the Project Funding Areas with school districts may solve the issue of awarding nationwide carriers grant dollars to serve "rural" areas that are a 1 mile extension around the city limits of Kansas City and Wichita. It may also solve the problem of carving out the most difficult and expensive to serve "rural rural" areas between the towns.

Priority Broadband Projects: Normally, it is natural to assume the lowest cost projects should win the award, which is done by either serving very large areas that have some density to offset the high-cost sparse areas, or by paying a higher match. Both of these conditions favor nationwide carriers that can leverage much larger proposed service areas, can easily put 25% Letter of Credit dollars aside, and can pay a higher match to win the award, which will be prioritized by KOBD. This puts the smaller community providers at a disadvantage. There is a reason these nationwide carriers left the high cost areas and caused our unserved areas to become unserved over the past decade, as the FCC continually updated the definition of the minimum speed for broadband. To create grant criteria to attract these same companies back due to a historical federal grant bias to award very large companies must be considered in these historic times. To take a big city solution and shrink it down to fit a state made up mostly of smaller towns and farmland doesn't work. A percentage of points should not be allocated to higher average costs per location. High cost locations are the reason BEAD was created. It is too easy to fall back to these lowest cost/higher match conditions because that is how the brain works in normal situations. This is not a normal situation. It was created due to a very abnormal time of an upside down world. Higher costs will be the normal. Everything has increase in price since BEAD was announced: equipment, labor, benefits, fuel, vehicles, engineering, auditors, tower rent, electricity, interest rates, everything. YET, broadband rates are expected to decrease? Why? How is this justified? What is the \$89.99 top point price based on? Is it based on a "nationwide average" which doesn't exist just as a nationwide cost per passing cannot exist? This favors nationwide providers and does not incent small businesses to compete. This may be addressed in the Waiver of Matching Funds, but it requires a lot more work.

Other Last Mile Broadband Deployment Projects: Determining affordability pricing based on initial investment cost to deploy is a mistake. A 20 year look should be considered for a better side-by-side comparison of fiber deployment vs fixed wireless. The cost of service should be higher for fixed wireless than for fiber.

Please provide your response to Requirement 9: Non-Deployment Activities

In under no circumstances should a reverse auction be considered. RDOF was a terrible federal level decision that is the opposite of how to solve rural broadband deployment.

Please provide your response to Requirement 15: Climate Assessment

Fiber optic should be buried to mitigate climate issues in Kansas. With continuous wind, lightning, ice, fire, and other weather on the open plains, the cost to replace and repair towers will cause higher, inefficient ongoing annual costs. Bury it and all ongoing maintenance costs go down. It aligns with a long-range climate considerate solution in Kansas.

Jill Kuehny Oct 29, 2023

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

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