

Title **0003** 10/30/2023  
by **Jill Kuehny** in **Kansas BEAD Volume 2 Public comment** id. 44547521  
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## Original Submission 10/30/2023

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Are you filing a comment on behalf of an organization? No

Please indicate which sections of volume 2 you are responding to: Requirement 8: Subgrantee Selection process

Please provide your response to Requirement 8: Subgrantee Selection Process  
The large amount of unlicensed fixed wireless that has been built in Kansas since 2001 could be a consideration if/when areas do not receive a bid to deploy fiber. It doesn't "exist" or show up on the map due to the licensed vs unlicensed spectrum. Yet, it is everywhere. Disruption to industry is typically brought on by innovation, but this was not. Currently, RDOF caused even more carriers to build duplicate existing networks, causing interference issues with customer experience. If no one bids a high cost, rural area in BEAD, and the network exists but is unlicensed, it may be easier to find options for local providers to license the spectrum rather than fund duplicative replicas of existing networks as a Plan B or C.  
  
When many of the rural FW networks were kicked off their unlicensed spectrum a couple of years ago to auction those spectrums off to

nationwide cellular carriers for unexpected record highs of \$85B, the cost to move bands was enormous on the small companies who are still recovering these costs while at the same time, RDOF awarded even more fixed wireless to be built to serve the same areas with the same equipment, sharing space on the same towers. It is still a terrible situation as tower rents have increased, interference has increased, grants awarding fiber deployment decrease the number of customers on towers, yet the 5-year tower lease is still contractual. It is truly a conundrum. More customers are suffering, or their tower connection has been shut down, due to a federally subsidized RDOF awarded company who has yet to provide service to these customers. It's unsustainable for the existing small businesses who served the area for 20 year to continue to operate these towers. The same small businesses were the competing RDOF bidders down to the 30% level, with plans to build fiber to these customers. Timely that this is the Halloween season because RDOF is a horror show for rural customers that continues to find terrible consequences. Now the federal plan is to duplicate again to bring fiber to these areas, which is what the community providers intended to do with RDOF. Trust has not been regained yet to ensure these customers will be treated as humans and not just dots on an always-incomplete and always-changing map. Trying to generalize rural areas in a federal scope has not and will not be a solution in these areas 10 miles away from a wire center in the nearest town. Like RDOF, the community providers at first felt BEAD was a great opportunity to convert all of neighboring towns to fiber optic, since their legacy telephone provider chose not to invest in these communities 10 years ago, causing the wound that would be exposed during COVID.

If broadband is considered essential and universal connectivity is to be ensured to every home, business, farm, and CAI, do not cheapen this very complicated, expensive problem. Reverse auctions should only be considered in highly dense urban areas, and never applicable in rural areas. It is insulting this wasn't thought through in how upside-down that decision was. It made sense until you think about it. Which means, no one thought it through to serve the highest cost areas with the least. When federal theory meets rural realities, it creates RDOF-like disasters that devalue rural life which opposes the KOBD goal to prioritize rural locations and mitigate local barriers. Rural areas with less population are not to be considered lesser than. It is where all of our food, fuel and fiber comes from. Please watch for federal blanket application that may make sense until you think about it.

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Jill Kuehny, Oct 30, 2023

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