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Public comment

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Please provide your first and last name Gabriel Moran

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Please provide your address (not required)

Are you filing a comment on behalf of an organization? Yes

Which organization are filing on behalf of? Tarana Wireless, Inc.

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 Tarana Wireless is pleased to see the Kansas Office of Broadband Development (KOBD) implement a flexible approach that allows for providers to bid for project areas with proposals that utilize hybrid technologies. We believe that this approach will allow Kansas to maximize the amount of fiber to be deployed while ensuring the most hard-to-reach (and therefore expensive) broadband serviceable locations (BSLs) do not dissuade a bidder from participating in the process. The initial concept behind BEAD areas was that an area should consist entirely of either fiber or other technologies. However, this approach poses significant challenges in practice, as there are often cases where a group of BSLs (broadband serviceable locations) that wouldn't typically justify fiber deployment is

grouped with a set of BSLs that can easily be served with fiber. To address this issue and enhance capital efficiency, we propose allowing a percentage of locations below the Extremely High Cost Per Location Threshold fiber areas to be non-fiber.

To maintain a preference for fiber, we suggest implementing limits on the number of non-fiber locations allowed per area, along with a minimum performance threshold to ensure that the entire area receives "fiber-like" service quality. While 100/20 Mbps is the FCC floor, bids that utilize a mix of technologies should be assigned additional points to non-fiber technologies able to achieve speeds above the federal minimum. We suggest the below tiers:

- > 200/50 Mbps
- > 400/100 Mbps
- > 1 Gbps/250 Mbps

For example, one possible rule could permit up to 20% of the BSLs in an area to be served with reliable non-fiber infrastructure, provided that these locations achieve performance levels exceeding 200/50Mbps or even 400/100Mbps. This approach would likely increase the number of bidders per area while ensuring that resources are not wasted on serving extremely challenging locations within an area, thus allowing for a more efficient extension of overall coverage and ensuring resources can be devoted to Digital Equity initiatives.

Speed Tiers: Following fiber, the BEAD Notice of Funding Opportunity provides preference to alternate technologies utilizing licensed spectrum but lacks further guidance on how to evaluate wireless bids. High-frequency wireless technology offers high speeds but covers relatively shorter distances, resulting in significantly higher costs. Unlicensed frequency bands are often considered unreliable due to potential interference that may impact performance over time. However, mobile networks in licensed spectrum also face resource contention, albeit in a different, more managed manner. Given the addition of next-generation Fixed Wireless Access to the already diverse range of wireless technologies, it becomes imperative to assess non-fiber options using objective criteria.

Tarana Wireless would recommend the following performance tiers for Kansas:

- >200/50 Mbps
- >400/100 Mbps
- >1 Gbps/250 Mbps

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

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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 &

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