
Title **0015** 11/11/2023

by **Carlee Parker** in **Kansas BEAD Volume 2** id. 44669838

Public comment

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Original Submission 11/11/2023

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

Which organization are filing on behalf of? IdeaTek

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

IdeaTek has feedback regarding 2 points in Requirement 8; Subgrantee Selection Process of Kansas BEAD Initial Proposal, Vol. 2. First, we believe that technical feasibility self-certification, rather than PE certification, for companies with demonstrated proficiency, qualifications and experience in broadband deployment. Requiring PE certification shifts extreme burden onto the PE and significantly increases upfront costs for the service provider. Historically, there is no record of poorly performing fiber optic broadband networks by self-performing operators. Additionally, there are limited PE professionals with the requisite educational background, credentials, and technical subject matter experience and expertise, further contributing to increased costs. Notably, the KOBD has previously accepted language that allows a qualified agent of the awardee to verify the project design demonstrates adequate proficiency presumably without negative impact to grant performance. Changing the processes by which qualified broadband operators build networks only serves to increase program costs and increase the risk of unexpected consequences.

Second, we believe that the guidelines should allow for post-award premise true-up to correct any BSL anomalies. Because service providers have no control over BSL anomalies, the KOBD should provide a reasonable safe-harbor premise reduction quality of 10% before seeking a pro-rata reduction of applicant funding. Notably, ineligible premises are often random and do not typically reduce the total cost of construction. KOBD should amend its rules to address premise reductions beyond the safe harbor, but only on a pro-rata basis and without penalizing the awardee for not building to BSL's that do not contain a value premise. Furthermore, KOBD should not withhold final payment of any verified project expenses due to a BSL challenge process that is pending.

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

Carlee Parker

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Kansas Department
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