

**Alaska Communications Systems
Comments to
The Department of Commerce
National Telecommunications and Information Administration
And
The Department of Agriculture Rural Utilities Service**

Executive Summary

Broadband investment in Alaska is challenged by the economics of deploying and maintaining facilities across a vast expanse of sparsely populated land. Private capital has already funded some efforts and broadband deployment, but substantial areas are unlikely to see broadband without significant public funding. With this in mind, Alaska Communications Systems offers these comments.

Assessing unserved and underserved populations in Alaska is uniquely different from most of the other states. The small and isolated communities in rural Alaska have little in common with rural agricultural communities in the rest of the country. Here, many of our communities have no roads connecting them and no reliable sources of commercial power – frequently there are no terrestrial or submarine communications links leaving large portions of the state reliant on expensive and spotty satellite service. Access to education and medical care is hampered by the limited availability of services and the extreme isolation. Broadband availability requires significant investment in both transport and last mile connectivity.

In determining which broadband investments best meet the public interest, we believe it is vital that such investment be productive and produce a return, rather than be a one-time expense. In the attached responses to your questions we have set forth our suggestions for awarding grants including principled selection criteria, the most important of these being:

Sustainability: critical to ensuring future availability of broadband services without additional public funding. Revenue opportunities and customer demand must be demonstrated to ensure operating expenses will be met. Existing infrastructure, such as roads and commercial power, should be leveraged wherever possible. Projects need to demonstrate not only immediate and tangible jobs, but long term sustainable employment opportunities.

Economic Development: must be furthered, regionally and nationally, by any investment in broadband expansion.

Expertise: all applicants, including private industry, government agencies and not-for-profit groups, must demonstrate the management and technical expertise necessary to execute on the proposed project. Private industry cannot be excluded, either as applicants or partners to applicants, as we bring the necessary expertise to ensure success.

Job Creation: including direct implementation and maintenance jobs and associated manufacturing and support services jobs created or saved.

Benefits to anchor community institutions: including improved education, health care and public safety services

We also believe that there are criteria that must be defined and assessed carefully to avoid market and industry consequences. Specifically, while we support nondiscriminatory access to facilities constructed with public funding, we feel that the public interest is maximized by ensuring reciprocal access to existing facilities of private parties that also want to take advantage of the facilities built with ARRA dollars.

Principled selection criteria appropriately weighted and applied consistently is the only practical method of ensuring the numerous grant applications are fairly reviewed and considered, the grant funds are awarded quickly, the public interest is protected and the benefits realized. Only the best projects, those projects that meet or exceed the principled selection criteria, should be funded to ensure viable projects that deliver lasting benefits.

NTIA and RUS questions and ACS' response

1. The Purposes of the Grant Program: Section 6001 of the Recovery Act establishes five purposes for the BTOP grant program:
 1. Provide access to broadband service to consumers residing in unserved areas of the United States;
 2. provide improved access to broadband service to consumers residing in underserved areas of the United States;
 3. provide broadband education, awareness, training, access, equipment, and support to--
 - a) Schools, libraries, medical and healthcare providers, community colleges, and other institutions of higher education, and other community support organizations and entities to facilitate greater use of broadband service by or through these organizations;
 - b) organizations and agencies that provide outreach, access, equipment, and support services to facilitate greater use of broadband service by low-income, unemployed, aged, and otherwise vulnerable populations; and
 - c) job-creating strategic facilities located within a State-designated economic zone, Economic Development District designated by the Department of Commerce, Renewal Community or Empowerment Zone designated by the Department of Housing and Urban Development, or Enterprise Community designated by the Department of Agriculture;
 4. improve access to, and use, of broadband service by public safety agencies; and
 5. stimulate the demand for broadband, economic growth, and job creation

a. Should a certain percentage of grant funds be apportioned to each category?

No. Each project/applicant should be evaluated on its own merits applying generally applicable evaluation criteria (GAEC) to be adopted by NTIA/RUS. Projects with the highest overall point totals should be the primary candidates for funding. The GAEC should assess the general criteria set out by Congress and apply to each application by the same standard. See recommended criteria at response 4a.

b. Should applicants be encouraged to address more than one purpose?

Yes, with appropriate weighting for the relevance of defined criteria. See recommended criteria at question 4a.

c. How should the BTOP leverage or respond to the other broadband-related portions of the Recovery Act, including the United States Department of Agriculture (USDA) grants and loans program as well as the portions of the Recovery Act that address smart grids, health information technology, education, and transportation infrastructure?

Award points should be included in the GAEC for projects that complement or otherwise leverage the impact of other aspects of ARRA, as well as other identifiable government

programs. Public/private partnerships and other forms of partnering to take advantage of efficiencies should be encouraged via the awarding of evaluation points.

2. The Role of the States: The Recovery Act states that NTIA may consult the States (including the District of Columbia, territories, and possessions) with respect to various aspects of the BTOP. The Recovery Act also requires that, to the extent practical, the BTOP award at least one grant to every State.

a. How should the grant program consider State priorities in awarding grants?

States should be invited to provide "consultative" input to the BTOP process. Given the incredibly tight timelines prescribed by ARRA, it is unreasonable to assume that states will have enough time to develop and implement a formalized project review process. Instead, states should offer principled recommendations regarding what areas are unserved and underserved; what economic development opportunities would be promoted by broadband expansion; and other such policy guidance for use by the evaluators. Given that States may be competitors for the same grant funds an inherent conflict of interest may exist. Consequently, State specific review of applications should not occur.

b. What is the appropriate role for States in selecting projects for funding?

See response at 2a.

c. How should NTIA resolve differences among groups or constituencies within a State in establishing priorities for funding?

Apply a standardized set of criteria and weighting and evaluate all applications on the same standard. See criteria recommendation at response 4a.

d. How should NTIA ensure that projects proposed by States are well-executed and produce worthwhile and measurable results?

Proposals from any party, including a State, should be evaluated on the same standardized set of criteria and weighting.

3. Eligible Grant Recipients: The Recovery Act establishes entities that are eligible for grant under the program. The Recovery Act requires NTIA to determine by rule whether it is in the public interest that entities other than those listed in Section 6001(3)(1)(A) and (B) should be eligible for grant awards.

a. What standard should NTIA apply to determine whether it is in the public interest that entities other than those described in Section 6001(e)(1)(A) and (B) should be eligible for grant awards?

Include criteria in the GAEC that represent the public interest. As recommended in 4a, evaluate the benefits to anchor community institutions such as education, healthcare and emergency services, to national defense and other national interests, to job creation and economic development opportunities, etc. These criteria all serve short and long term public interest. In evaluating the public interest, consideration should be given to the experience and proven ability to deliver broadband service by private companies, as applicants or partners to applicants, and find as a matter of law at the earliest possibly opportunity.

4. Establishing Selection Criteria for Grant Awards: The Recovery Act establishes several considerations for awarding grants under the BTOP. In addition to these considerations, NTIA may consider other priorities in selecting competitive grants.

a. *What factors should NTIA consider in establishing selection criteria for grant awards? How can NTIA determine that a Federal funding need exists and that private investment is not displaced? How should the long-term feasibility of the investment be judged?*

Generally applicable evaluation criteria (GAEC) should be established based on the purpose of ARRA, job creation and economic growth, and the broadband requirements set out by Congress. Following is a recommended GAEC for use in evaluating and awarding grants:

Sustainability –sufficient revenue from customers and other existing sources of revenue to support all operating expenses	15%
Economic development, regional and national – short and long-term	15%
Expertise - Applicants proven ability to implement, manage and operate the project	15%
Job creation – how many jobs will be created: short and long-term and where	10%
Benefits to community anchor institutions: education, health care, public safety, emergency responders, etc.	10%
Reaching vulnerable populations	5%
Unserved population to be covered by the project and how	5%
Underserved population to be covered by the project and how	5%
Extent of non-discriminatory access and interconnection to backbone infrastructure	5%
Benefits to National Security interests	5%
Other national, state or regional interests	5%
If proposal is for the construction of backbone infrastructure, what opportunities exist for future last mile connectivity and if for mobile broadband, what is the extent of access when roaming	3%
Complementary government grant projects – not limited to ARRA	2%

Require an attestation from an authorized representative of the applicant stating that private funding would not be available in the next two years. Long term feasibility should be judged through appropriate standardized and weighted criteria that demonstrate the project viability and compliance with ARRA as recommended above.

b. *What should the weighting of these criteria be in determining consideration for grant and loan awards?*

See response at 4a.

c. *How should the BTOP prioritize proposals that serve underserved or unserved areas? Should the BTOP consider USDA broadband grant awards and loans in establishing these priorities?*

Apply the GAEC as recommended in 4a., above, but do not focus unduly on any one factor, including unserved and underserved. Failure to consider all the criteria increases the risk that funds will be awarded to projects that do not deliver on the goals and objectives set out by Congress.

d. Should priority be given to proposals that leverage other Recovery Act projects?

Projects that leverage other government grants or funding sources (i.e. nonprofit grant awards) should receive a score but only as a criterion and only in accordance with the assigned weighting in the GAEC. Priority should not be given to any one criterion.

e. Should priority be given to proposals that address several purposes, serve several of the populations identified in the Recovery Act, or provide service to different types of areas?

Yes, within the scope of a well structured GAEC, these projects would naturally score higher.

f. What factors should be given priority in determining whether proposals will encourage sustainable adoption of broadband service?

Proposals that can deliver comparable pricing for comparable service in urban and rural areas will aid sustainable adoption; however, the primary consideration is making broadband relevant to consumers. In other words, identifying what is in it for the consumer. Consider the influence of the project on distance education, online employment or business development, regional economic development and access to services not locally available such as shopping or social groups. Additionally, consider how consumer affordability will be funded through anchor commercial customers that provide sufficient revenue to cover operating costs.

g. Should the fact that different technologies can provide different service characteristics, such as speed and use of dedicated or shared links, be considered given the statute's direction that, to the extent practicable, the purposes of the statute should be promoted in a technologically neutral fashion?

Mobility has advantages for consumers that fixed connections do not have and can contribute significantly to adoption as users realize the advantages of staying connected while on the move. The GAEC should consider the viability of a proposed mobile solution.

h. What role, if any, should retail price play in the grant program?

The government should not unduly distort the market. Projects that are calculated to produce services in rural areas comparable to services in urban areas for comparable prices should rate higher. Additionally, consider how consumer affordability will be funded through anchor commercial customers that provide sufficient revenue to cover operating costs.

5. Grant Mechanics: The Recovery Act requires all agencies to distribute funds efficiently and fund projects that would not receive investment otherwise.

a. What mechanisms for distributing stimulus funds should be used by NTIA and USDA in addition to traditional grant and loan programs?

The best approach is grants. Loans would require higher end user pricing to cover loan repayments and associated administration. In many of the target areas, price is an issue for the end user and affects adoption.

b. How would these mechanisms address shortcomings, if any, in traditional grant or loan mechanisms in the context of the Recovery Act?

The RUS should not give preference to previous applicants to the exclusion of other deserving and more viable projects.

6. Grants for Expanding Public Computer Center Capacity: The Recovery Act directs that not less than \$200,000,000 of the BTOP shall be awarded for grants that expand public computer center capacity, including at community colleges and public libraries.

a. *What selection criteria should be applied to ensure the success of this aspect of the program?*

No response.

b. *What additional institutions other than community colleges and public libraries should be considered as eligible recipients under this program?*

No response.

7. Grants for Innovative Programs to Encourage Sustainable Adoption of Broadband Service: The Recovery Act directs that not less than \$250,000,000 of the BTOP shall be awarded for grants for innovative programs to encourage sustainable adoption of broadband services.

a. *What selection criteria should be applied to ensure the success of this program?*

No response.

b. *What measures should be used to determine whether such innovative programs have succeeded in creating sustainable adoption of broadband services?*

No response.

8. Broadband Mapping: The Recovery Act directs NTIA to establish a comprehensive nationwide inventory map of existing broadband service capability and availability in the United States that depicts the geographic extent to which broadband service capability is deployed and available from a commercial provider or public provider throughout each State.

a. *What uses should such a map be capable of serving?*

A nationwide broadband map should aid the identification of future funding priorities and identify unserved and underserved areas.

b. *What specific information should the broadband map contain, and should the map provide different types of information to different users (e.g., consumers versus governmental entities)?*

Generally speaking, the map should include areas served, populations served, availability of various technologies, capability of technologies available and, if possible (given the comment above), general end user cost characteristics of services available. In addition to consumers and governmental entities, the map should reflect the business offers that are available. This last item will be a key driver of the derivative economic growth benefit associated with ARRA funding.

c. *At what level of geographic or other granularity should the broadband map provide information on broadband service?*

Mapping should focus on geographical communities – villages, towns, cities, counties, boroughs, etc. In major metropolitan areas, there may be a need to further subdivide the larger community into smaller components.

d. What other factors should NTIA take into consideration in fulfilling the requirements of the Broadband Data Improvement Act, Public Law 110-385 (2008)?

In consideration of affordability, evaluate the sustainability model for the project to ensure applicants aren't proposing rural service fees higher than urban areas for comparable services and that sufficient customer base exists, commercial and consumer, to fund operating expenses.

e. Are there State or other mapping programs that provide models for the statewide inventory grants?

The State of Alaska did conduct a preliminary inventory of broadband availability a few years ago, but it largely relied on written inputs from service providers. It did not result in an ongoing or periodically updated database.

f. Specifically what information should states collect as conditions of receiving statewide inventory grants?

States should collect the following broadband data:

- wireless or wireline
- mobile or fixed
- speeds available,
- number of providers in each service area
- availability of service in desired area

g. What technical specifications should be required of State grantees to ensure that statewide inventory maps can be efficiently rolled up into a searchable national broadband database to be made available on NTIA's Web site no later than February 2011?

Define a standard data set in a standard format to be followed by each state. Ensure states can work effectively with service providers to produce the required information in an efficient manner. States must be prepared to fund the cost of requesting the data set from the service providers.

h. Should other conditions attach to statewide inventory grants?

Provide funding to service providers to meet these standards: In considering the cost of mapping to state agencies, consideration must be given to the cost imposed on service providers to provide the data set and funding apportioned accordingly.

i. What information, other than statewide inventory information, should populate the comprehensive nationwide map?

Service provider names

j. The Recovery Act and the Broadband Data Improvement Act (BDIA) imposes duties on both NTIA and FCC concerning the collection of broadband data. Given the statutory requirements of the Recovery Act and the BDIA, how should NTIA and FCC best work together to meet these requirements?

Define a standard data set in a standard format and provide states and service providers the necessary funding to complete.

9. Financial Contributions by Grant Applicants: The Recovery Act requires that the Federal share of funding for any proposal may not exceed 80 percent of the total grant. The Recovery Act also

requires that applicants demonstrate that their proposals would not have been implemented during the grant period without Federal assistance. The Recovery Act allows for an increase in the Federal share beyond 80 percent if the applicant petitions NTIA and demonstrates financial need.

a. What factors should an applicant show to establish the "financial need" necessary to receive more than 80 percent of a project's cost in grant funds?

Applicants must have some level of their own investment to ensure that funds are not wasted and that projects are viable. To receive more than the 80% award, applicants should prove that the project is highly viable (i.e. 90% GAEC score or higher), that there are no better projects for the target unserved or underserved area(s) and financial need is clearly demonstrated.

b. What factors should the NTIA apply in deciding that a particular proposal should receive less than an 80 percent Federal share?

Applicants will typically assume an approved project will be funded at 80% and will be relying upon this assumption to prove sustainability in their applications. Unless the availability of alternative funding is obvious, NTIA/RUS should not consider funding at a level below 80%. If sufficient funding is not available in a single award period, consideration should be given to awarding funding in segments over two or three of the award periods.

c. What showing should be necessary to demonstrate that the proposal would not have been implemented without Federal assistance?

Require a written representation to this effect from a duly authorized representative of the applicant.

10. Timely Completion of Proposals: The Recovery Act states that NTIA shall establish the BTOP as expeditiously as practicable, ensure that all awards are made before the end of fiscal year 2010, and seek assurances from grantees that projects supported by the programs will be substantially completed within two (2) years following an award. The Recovery Act also requires that grant recipients report quarterly on the recipient's use of grant funds and the grant recipient's progress in fulfilling the objectives of the grant proposal. The Recovery Act permits NTIA to de-obligate awards to grant recipients that demonstrate an insufficient level of performance, or wasteful or fraudulent spending (as defined by NTIA in advance), and award these funds to new or existing applicants.

a. What is the most efficient, effective, and fair way to carry out the requirement that the BTOP be established expeditiously and that awards be made before the end of fiscal year 2010?

Define and weight the requirements based on the intent of the stimulus bill and the criteria defined by Congress; define the application process, and standardize the process across the agencies. Time should not be spent trying to define every term with consideration for the future implications as this will delay the application process and the award of funds. Instead set standards exclusive to the award of grants or loans under ARRA to manage the evaluation and award of funds.

b. What elements should be included in the application to ensure the projects can be completed within two (2) years (e.g., timelines, milestones, letters of agreement with partners)?

Require the applicant to make a written representation that the application meets the requirements; describe how they will meet the requirements through the engineering plans, project plans and business case. Require successful applicants to provide regular (i.e.

quarterly) progress reports during implementation and a certificate of completion executed by a duly authorized representative of the applicant.

11. Reporting and Deobligation: The Recovery Act also requires that grant recipients report quarterly on the recipient's use of grant funds and progress in fulfilling the objectives of the grant proposal. The Recovery Act permits NTIA to de-obligate funds for grant awards that demonstrate an insufficient level of performance, or wasteful or fraudulent spending (as defined by NTIA in advance), and award these funds to new or existing applicants.

a. How should NTIA define wasteful or fraudulent spending for purposes of the grant program?

Wasteful: unnecessary or unreasonably costly purchases of goods and services, including labor

Fraudulent: use of funds for activities, purchases or expenses not defined in the approved grant application and not reasonably associated with the project

b. How should NTIA determine that performance is at an "insufficient level?"

Review regular progress reports (see 10b) to identify any project that is substantially behind schedule or over budget without a reasonable recovery plan. Additionally, conduct random audits using the engineering and project plans, business case and budget to identify issues.

c. If such spending is detected, what actions should NTIA take to ensure effective use of investments made and remaining funding?

Require the organization to develop an acceptable recovery plan then conduct frequent audits to ensure compliance. If a reasonable recovery plan cannot be identified, withhold remaining funds and consider another party to complete the project or cancel the grant. Prosecute applicants for any fraudulent activities.

12. Coordination with USDA's Broadband Grant Program: The Recovery Act directs USDA's Rural Development Office to distribute \$2.5 billion dollars in loans, loan guarantees, and grants for broadband deployment. The stated focus of the USDA's program is economic development in rural areas. NTIA has broad authority in its grant program to award grants throughout the United States. Although the two programs have different statutory structures, the programs have many similar purposes, namely the promotion of economic development based on deployment of broadband service and technologies.

a. What specific programmatic elements should both agencies adopt to ensure that grant funds are utilized in the most effective and efficient manner?

Follow the defined selection criteria in the GAEC and standardize the performance criteria based on the selection criteria and the business case for the grant. Provide an expedient process for plan adjustments especially where an issue could not reasonably be identified in advance (i.e. delays due to extreme weather conditions or failure of a major supplier).

b. In cases where proposals encompass both rural and non-rural areas, what programmatic elements should the agencies establish to ensure that worthy projects are funded by one or both programs in the most cost effective manner without unjustly enriching the applicant(s)?

Interagency coordination will work to address this. Applicants should be free to submit the same project proposal to both agencies. Where both agencies approve a project, the agency that offers a grant (rather than a loan) should be given the first opportunity to fund the

program. In some cases, it may be necessary for projects to be separated into rural and non-rural components in order to maximize the coverage of the two programs. Where rural projects cannot be grant funded, they may still be eligible for RUS loans or loan guarantees. By automating the agencies' processes, it should be relatively easy to ensure that duplicate funding is not provided for the same project.

13. Definitions: The Conference Report on the Recovery Act states that NTIA should consult with the FCC on defining the terms "unserved area," "underserved area," and "broadband." \15\ The Recovery Act also requires that NTIA shall, in coordination with the FCC, publish nondiscrimination and network interconnection obligations that shall be contractual conditions of grant awards, including, at a minimum, adherence to the principles contained in the FCC's broadband policy statement (FCC 05-15, adopted August 5, 2005).

a. *For purposes of the BTOP, how should NTIA, in consultation with the FCC, define the terms "unserved area" and "underserved area?"*

Unserved: Any location or identifiable population with a year round sustainable or growing population that has data service with sustainable speeds less than 200kbps

Underserved: Any location or identifiable population with a year round sustainable or growing population that has sustainable data service speeds less than 1Mbps for mobile and 10Mbps for fixed.

b. *How should the BTOP define "broadband service?"*

(1) *Should the BTOP establish threshold transmission speeds for purposes of analyzing whether an area is "unserved" or "underserved" and prioritizing grant awards? Should thresholds be rigid or flexible?*

Threshold data speeds should not be established as an eligibility criterion for participation in ARRA or to define "broadband service". Data speeds as noted in 13a above, can contribute to the definition of "unserved" and "underserved". The ability to deliver varying levels of data speeds beyond those noted above can be an element of evaluation and point award in the GAEC. Priority (in the form of additional GAEC points) should be given to projects that seek to bring service to unserved areas or populations.

(2) *Should the BTOP establish different threshold speeds for different technology platforms?*

Yes for mobile versus fixed but for no other categories.

(3) *What should any such threshold speed(s) be, and how should they be measured and evaluated (e.g., advertised speed, average speed, typical speed, maximum speed)?*

See 13a., above. If threshold speeds are used as part of the "unserved" and "underserved" definitions, it should be clear that "speed" in this context refers to connect speed – the sustainable speed provided between the end user's device (PC, laptop, hand-held device, cell phone, etc.) and the first router to which such device connects. Given the large number of "choke points" along the path to an ultimate destination, it is not prudent to try to set and "end-to-end" speed standard.

(4) *Should the threshold speeds be symmetrical or asymmetrical?*

Market forces should dictate consumer preferences.

(5) *How should the BTOP consider the impacts of the use of shared facilities by service providers and of network congestion?*

NTIA/RUS should award points via the GAEC for proposals that not only offer improvement in connect speed, but also include configurations that improve throughput beyond the initial router (i.e. higher capacity backhaul, new technology, underlying facilities and interconnection arrangements, etc.). As previously noted, however, not all "choke points" can be controlled and periodic network congestion is inevitable. It would not be productive to set standards that purport to limit or eliminate all forms of network bottlenecks.

c. How should the BTOP define the nondiscrimination and network interconnection obligations that will be contractual conditions of grants awarded under Section 6001?

(1) In defining nondiscrimination obligations, what elements of network management techniques to be used by grantees, if any, should be described and permitted as a condition of any grant?

Distinguish Greenfield projects from incremental improvements to existing privately funded infrastructure. Non-discrimination and interconnection requirements should extend to existing infrastructure publicly funded under any other program. Extending these requirements to privately funded infrastructure would likely discourage efficient expansion of broadband capacity encouraging only new construction proposals and effectively reducing the funds available for expansion. That said, major rebuild of existing infrastructure should be subject to non-discrimination and interconnection requirements set out for these grant awards.

(2) Should the network interconnection obligation be based on existing statutory schemes? If not, what should the interconnection obligation be?

NTIA/RUS rules should create an environment of nondiscriminatory access. Where multiple facilities are present, reciprocal access and pricing should be the norm. To the extent that prior legislative directives were intended to be market-opening mechanisms (i.e. the Telecom Act of 1996), those provisions should not apply to ARRA-funded projects.

(3) Should there be different nondiscrimination and network interconnection standards for different technology platforms?

Yes, Greenfield wireline projects are different than wireless expansion projects. Towers, power plants and backhaul can be shared but switching and transmission equipment is difficult to share in an effective manner that will truly benefit consumers.

(4) Should failure to abide by whatever obligations are established result in de-obligation of fund awards?

Yes – assuming there is a demonstrable material, factual basis for the claim of noncompliance and procedural due process safeguards are honored.

(5) In the case of infrastructure paid for in whole or part by grant funds, should the obligations extend beyond the life of the grant and attach for the useable life of the infrastructure?

Yes but requirements should extend to reciprocal use of comparable facilities between providers.

d. Are there other terms in this section of the Recovery Act, such as "community anchor institutions," that NTIA should define to ensure the success of the grant program? If so, what are those terms and how should those terms be defined, given the stated purposes of the Recovery Act?

It might be useful to define these other terms in broad categorical ways in order to appropriately target the scope of coverage without become overly exclusionary. See response at 4a for examples.

e. What role, if any, should retail price play in these definitions?

Government funding should not unreasonably distort the market as this could diminish the ROI for private capital investments causing a disincentive to further expansion. The right target is urban to rural comparable prices for comparable service.

14. Measuring the Success of the BTOP: The Recovery Act permits NTIA to establish additional reporting and information requirements for any recipient of grant program funds.

a. What measurements can be used to determine whether an individual proposal has successfully complied with the statutory obligations and project timelines?

Require progress and completion reports on the basis of the selection criteria and project deliverables defined in the application plans. Require a certification of completion signed by an authorized representative of the applicant.

b. Should applicants be required to report on a set of common data elements so that the relative success of individual proposals may be measured? If so, what should those elements be?

Require progress and completion reports on the basis of the selection criteria and project deliverables defined in the application plans.

15. Please provide comment on any other issues that NTIA should consider in creating BTOP within the confines of the statutory structure established by the Recovery Act.

Please see the Executive Summary.