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## **ARIZONA TELECOMMUNICATIONS AND INFORMATION COUNCIL**

April 13, 2009

To: [BTOP@nita.doc.gov](mailto:BTOP@nita.doc.gov)

### **Recommendations of Arizona Telecommunications and Information Council (ATIC) NTIA Broadband Technology Opportunities Program**

#### **DEPARTMENT OF COMMERCE**

**National Telecommunications and Information Administration (NTIA)**

#### **DEPARTMENT OF AGRICULTURE**

**Rural Utilities Service**

**Docket No. 090309298-9299-01**

#### **1. Purpose**

There needs to be coordination between and among all parties prior to determining how stimulus funds should be apportioned so that the areas most in need of broadband infrastructure can receive their fair share of available resources. Each state utilizing mapping as well as working with their own broadband development authorities in conjunction with public, private and public/private cooperative manner are best suited to implement and complete these programs.

#### **2. Role of States**

The states must take the lead role in establishing both short and long term needs which will fit into their statewide development plan and its implementation. These plans would be developed with all interested stakeholders and be defined to fit the needs of each state. For those states with no long range plans, NTIA, RUS and the FCC can consult with each state as the best and most expeditious way to proceed.

Each state must play a definitive role in coordinating all public, private, public/private non-profit and state entities on a non-discriminating basis to insure that the most comprehensive and high quality projects are implemented.

#### **3. Eligible Grant Recipients**

Each state will utilize its individual processes to determine eligibility as long as it falls within the guidelines established by the Broadband Technology Opportunities Program. This will give the Federal Grant and Loan process and the states the flexibility to determine which entities and

projects are most desirable and meet the needs of the communities that are being funded and that fit into the overall state needs. Grant applicants demonstrating active partnerships and/or participation of local community leaders, public service, educators, health providers, economic development (business) and other such stakeholders must be considered as equal partners in granting projects.

#### **4. Establishing Selection Criteria for Grant Awards**

Selection criteria should focus first on filling the gaps in the present infrastructure, developing middle mile and coordinating rural unserved and underserved areas. Non rural underserved areas should be priorities utilizing those with the most need. Bringing broadband to these unserved and underserved areas with the greatest need (numbers of addresses in a particular defined area with access) should be a primary goal. Each program should fit into the overall goals of the state development plan. The technology utilized for each project must be neutral but should fit into the overall development of the state plan. The price of service is always a factor especially in high cost rural areas as well as many underserved non-rural parts of the urban and suburban parts of the state. Care must be taken to recognize that high cost technology may not well serve low income and rural subscribers. Proposals demonstrating sustainability through public/private partnerships while also addressing greater community needs such as enhancement of connectivity to broadband for education, libraries, telemedicine, public safety and other public services should be given favorable consideration as they enhance the economic and social needs of the state infrastructure as well as economic developmental needs.

#### **5. Grant Mechanisms**

Sufficient time must be allocated to entities that apply for grants and loans under existing guidelines. In addition help needs to be afforded to those entities with limited resources to promptly apply for project funding.

#### **6. Grants for expanding Public Computer Center capacity**

Flexibility should be the key to expanding Public Computer Capacity. In addition to community colleges and public libraries, schools and other community institution should be included. This list is only a sample. Public schools, community centers, non-profit community organizations, senior centers, etc. should be in the mix.

#### **7. Grants for Innovative Programs**

Innovative programs are by definition unique to states or areas. The state authority coordinator should be the final arbiter of which innovative program best fits the need of state development and the needs of the community. The process must be collaborative with all stakeholders involved.

#### **8. Broadband Mapping**

1. NTIA should develop a standard easy to fill out form for use in each mapping program on a granular level. The maps should be constantly updated as new projects come on-line and infrastructure developed.
2. Granularity should be at the address level, which will indicate what is available and used at a particular address and whether the definition of broadband meets the criteria for speed, bandwidth, competition and price.

3. A distinction needs to be made concerning availability (can a subscriber get service at any price; that is can it be hooked up with additional outlay other than “normal?”). Does the subscriber have access to the Internet easily and at an affordable price? Availability does not always translate to accessibility in as many urban and high cost rural areas.

## **9. Financial Contributions**

The Recovery Act’s implantation must show flexibility in determining whether to implement the 80%-20% share for getting a grant or loan. The Act has a two-fold purpose – implement broadband development in underserved and urban and rural communities and increase economic development. This recession has proven the inability of many states and communities to fund critical human services. They therefore might not have the resources to adequately fund the 20% cash requirement. Other elements must be taken into consideration – in-kind contributions, long term loans, grants, etc. should be considered as matching contributions.

## **10. Timely Completion of Proposals**

Benchmarks should be established for each funded project requiring specific goals to be reached within a specific time allotment. These must be posted and be transparent as well as ensuring that the benchmarks are adhered to.

### **See 10 Above**

Arizona Telecommunications and Information Council (ATIC) is a 501(c)(6) non-profit organization. Its Vision is that all of Arizona’s citizens, businesses and organizations will have access to advanced telecommunications services and information technologies enabling them to participate in the global economy.

ATIC’s mission is to function as Arizona’s recognized and authoritative organization guiding technology policy development. ATIC develops, promotes and supports initiatives that encourage availability and deployment of telecommunication services and information technologies that are critical for community development and the health, safety, welfare, educational advancement and economic prosperity in Arizona communities.

ATIC has partnerships with large and small businesses, economic development organizations, educational institutions, libraries, consumer organizations, local and state government agencies, health care, the Arizona Legislature, the Arizona Corporation Commission, tribal communities, and information technology and telecommunications companies.

ATIC’s website is <http://www.arizonatele.com/atic/>



Oris Friesen, Vice Chair

Arizona Telecommunications and Information Council (ATIC)