



ASSOCIATION OF COMMUNICATION ENGINEERS

www.ace-engineers.com

Joel Williams, President

Mid-States Consultants, Inc.
3901 Rose Lake Drive
Charlotte, NC 28217
Tel. 704-357-0004
Fax. 704-357-0025
jowilliams@mscon.com

Tom Fulton, VP/President-Elect

Fulton Engineering, Inc.
P.O. Box 1920
1710 Dogwood Court
Broomfield, CO 80020
Tel. 303-905-3009
FAX 303-410-6616
tom@fultonengineering.com

Gregory Rise, Secretary/Treasurer

Compass Consultants, Inc.
150 2nd St. SW
Perham, MN 56573
Tel. 218-346-3600
Fax. 218-346-3610
greg.rise@trustcompass.com

Member Firms

ACRS 2000 Corp. Inc.
CBW Communications
Engineers, Inc.
CC&I Engineering Inc.
CCG Consulting, Inc.
CHR Solutions, Inc.
Communication Network
Engineers, Inc.
Communications Engineers, Inc.
Design South Professionals, Inc.
Engineering Associates, Inc.
Finley Engineering Company, Inc.
Fulton Engineering, Inc.
Geotech, Inc.
Gillespie, Prudhon
and Associates, Inc.
Heberly and Associates
HunTel Engineering
Joseph D. Fail Engineering
Company, Inc.
Kadrmass, Lee & Jackson, Inc.
Ladd Engineering
Associates, Inc.
Martin Group, Inc.
McCall-Thomas Engineering
Company, Inc.
Mid-State Consultants, Inc.
Milford Engineering Corp.
Mitchell Engineering
Monte R. Lee & Company
N-Com Inc.
Palmetto Engineering and
Consulting, LLC
RVW, Inc.
Vantage Point Solutions, Inc.

November 27, 2009

Mr. Lawrence E. Strickling
Assistant Secretary for Communications and Information
U.S. Department of Commerce/NTIA
1401 Constitution Avenue, N.W.
Washington, D.C. 20230

Mr. Jonathan Adelstein
Adminstrator, Rural Utilities Service
U.S. Department of Agriculture Room 5135-S
1400 Independence Ave SW, Stop 1510
Washington, DC 20250-0747

RE: Response to Joint Request for Information, published Nov. 16, 2009
Broadband Technology Opportunities Program/Broadband Initiatives Program
Professional Engineer Certification Language

Dear Mr. Strickling and Mr. Adelstein;

The Association of Communications Engineers (ACE) is a non-profit organization composed of Professional Engineers serving the telecommunications industry. Our members have been integral to the construction and deployment of advanced telecommunications technologies for over 50 years.

As a part of the Notice of Funds Availability for the Broadband Technology Opportunities Program and the Broadband Initiatives Program, applicants with proposals for Broadband Infrastructure project budgets exceeding \$1,000,000 were required to provide a certification (Addendum "D" to the application) signed by a professional engineer. Our members, while striving to support the program and the applications of their clients, have expressed concerns about the form and intent of this certification. Attached to this letter you will find recommendations that we believe will relieve the uncertainty and will improve the usefulness of the certification to the NTIA and RUS during the second and final round of the programs.

We encourage you to implement these recommendations. If you have any questions, or if you would like to discuss any of these points, please call me at (704) 357-0004

Sincerely,

Joel Williams

Joel Williams
President
Association of Communications Engineers

C: Mr. Mark Seifert, NTIA
Mr. David Villano, RUS
Mr. Lawrence A. Jacobson, NSPE
Mr. David A. Raymond, ACEC