



# THE FLORIDA OFFICE OF Economic Recovery

The Capitol, Room 1604  
Tallahassee, Florida 32399

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Broadband Initiatives Program, U. S. Department of Agriculture (RIN: 0660-ZA2B)

Broadband Technologies Opportunities Program, National Telecommunications and Information Administration (Docket Number: 0907141137-91375-05)

The Florida Office of Economic Recovery respectfully submits the following comments in response to the Joint Request for Information. The Florida Office of Economic Recovery prefaces its comments with the caveat that Round 1 has not yet been completed and the total effects, both positive and negative, of the current program requirements are not yet known. However, we understand the tight timeframe that NTIA and RUS face with the September 30, 2010 deadline set in Public Law 111-5 and the need to collect comments at this time.

## I. The Application and Review Process

### A. Streamlining the Applications

We recommend that all applicants be required to prepare an executive summary that will be made available to the public and that all executive summaries follow a defined template to ensure consistency of the information included and where it is located in the summary. At a minimum, the summary should include who (identification of lead applicant and all partners), what (the end result of the project and the major activities undertaken to achieve those results) and where (cities and/or counties and state).

1. New Entities – For recently-created entities, we recommend that RUS and NTIA require balance sheets, at a minimum, if no historical financial statements are available. It is critical that every entity be able to prove it has the financial resources to not only meet match requirements but have sufficient contingency funding to be able to handle cost overruns that are common to construction and technology projects.

### B. Transparency and Confidentiality

The State of Florida has previously sent comments to NTIA regarding challenges in conducting the State's review of application because of the lack of information available (Winstead letter to Strickling, October 14, 2009).

We recommend that RUS and NTIA do everything possible to make additional information publicly available to build public confidence in the integrity of the process. If information cannot be made

publicly available during the evaluation of applications, can more documents be made available once the round is completed?

We support the RUS and NTIA's idea to require a publicly available executive summary for each application (see comments above on consistent template).

C. Outreach and Support.

The national workshops were informative but costly in terms of time and travel costs. We recommend that RUS and NTIA consider greater use of webinars when the next NOFA is released to educate applicants about changes from Round 1, new requirements, etc.

D. NTIA Expert Review Process – It is difficult to comment on this until Round 1 is completed. For transparency and public confidence, we recommend that NTIA, at the end of Round 1, publish the names and organizational affiliations of all reviewers.

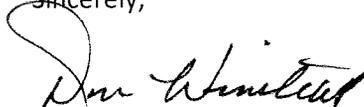
II. Policy Issues Addressed in the NOFA

1. Middle Mile "*Comprehensive Community*" Projects – We support RUS and NTIA's interest in Middle Mile projects when they provide needed infrastructure to anchor institutions that are critical to ARRA initiatives in health care, education and public safety. Any priority for such projects, however, should be within the context of whether the area is unserved or underserved, with priority to unserved areas. The degree of partnerships and commitments should also be a factor in evaluating competing projects for the same area.
2. Economic Development – As with the Middle Mile comment above, we support priority given to unserved areas over underserved areas, whether local or regional.
3. Targeted Populations – We recommend that RUS and NTIA continue to focus on the documented needs of unserved and underserved populations, based on subscription rates, access to computers, etc., rather than allocate a portion of the remaining funds to specific population groups.

For Public Computer Centers, we recommend that NTIA require applicants to provide service beyond normal business hours; such centers should be open weekends and evenings to meet the needs of those requiring these services. Centers open only Monday-Friday and during the day should not be eligible to apply.

F. Cost Effectiveness – We recommend that NTIA and RUS continue to assess the cost effectiveness or cost reasonableness of a particular project. However, since costs vary depending on the area being served, it is best to use it as a factor in evaluating competing applications for the same area.

Sincerely,



Don Winstead  
Special Adviser to the Governor