



November 30, 2009

Anthony Wilhelm, Deputy Associate Administrator  
Broadband Technology Opportunities Program  
National Telecommunications and Information Administration  
U.S. Department of Commerce  
HCHB Room 4887  
1401 Constitution Ave., NW  
Washington, DC 20230

Re: **Response to Request for Information**  
Broadband Technology Opportunities Program (BTOP)  
Docket Number 0907141137-91375-05

Dear Mr. Wilhelm:

The American Recovery and Reinvestment Act of 2009 (Recovery Act) offers opportunities to build high speed, broadband digital infrastructure that serves essential public purposes, promotes economic development, creates jobs, enhances sustainable use of broadband capacity in areas of a state that are unserved and underserved, and expands services to support vulnerable and isolated populations and promote public safety.

This letter outlines a suggested change within the Broadband Opportunities Technology Program (BTOP) that will allow development of grant applications that more efficiently and effectively meet the stated BTOP goals and more importantly increase the likelihood of bringing real and practical value to the citizenry of the State of Washington.

The suggested revision is targeted at the BTOP Round 2 Notice of Funding Availability (NOFA) and would explicitly allow applicants to bundle Public Computing Centers (PCC) and/or Sustainable Broadband Adoption with Infrastructure applications, both Middle and Last mile within one (1) grant application.

This change is important in enabling applicants to propose broader, integrated and more comprehensive solutions that would result in an increased probability that BTOP funding creates a positive and significant impact to citizens statewide. We request this change understanding that it affects not only NOFA policy and application process, but also requires changes within the application forms used for submittal, including hard copy and on-line forms.



The basis for our change uses Subsection A1 “Comprehensive Community Projects” in the RFI that focused on questions regarding Funding Priorities. Excerpts from the section pasted below for reference.

1. *Middle Mile “Comprehensive Community” Projects: Should Round 2 focus on projects that will deliver middle mile infrastructure facilities into a group of communities and connect key anchor institutions within those communities?*

We believe that development of middle mile infrastructure into community anchor institutions in and around unserved and underserved areas should encourage the integration of projects that create “Comprehensive Communities” by installing high capacity middle mile facilities to anchor institutions along with well planned and managed Public Computing Centers and Sustainable Broadband adoption programs that bring essential broadband services in government, health, safety, education, entertainment and cultural programs to citizens that they do not have today. Without having the explicit ability to bundle grant applications across the three BTOP funding areas we believe that there will be a reduction in quality, quantity and effectiveness of stand alone PCC and Sustainable Broadband Adoption programs when compared with a bundled approach.

In support of “Comprehensive Communities” as a key funding priority we also support the inclusion of benchmarks to measure future value and post project effectiveness of any Infrastructure application bundled with Public Computing and/or Sustainability programs. These “Benchmarks” would be requested of the applicant as part of their submittal for those applications that include the bundling of Infrastructure, PCC and/or Sustainable Broadband Adoption within one blanket application. These benchmarks should also be reported on throughout the project period to assure program execution meets or exceeds stated goals.

We believe these comments are fully consistent with spirit and purpose of the President’s broadband initiative, the letter of section 6001 of the Recovery Act, and the goals of the Washington State Governor’s Broadband Advisory Committee. We encourage your favorable consideration.

Sincerely,

Dave Spencer, COO NoaNet  
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