

**Before the  
DEPARTMENT OF AGRICULTURE, Rural Utilities Service  
and  
DEPARTMENT OF COMMERCE, National Telecommunications and Information  
Administration  
Washington, D.C.**

In the Matter of )  
 )  
Joint Request for Information ) Docket No. 0907141137-91375-05  
Broadband Initiatives Program (BIP) and )  
Broadband Technology Opportunities Program (BTOP) )

**COMMENTS OF  
PIONEER COMMUNICATIONS, INC.**

Pioneer Communications, Inc., (“Pioneer”)<sup>1</sup> respectfully submits these comments in response to the Rural Utilities Service and the National Telecommunications and Information Administration’s joint Request for Information (RFI) relating to the implementation of the Broadband Initiatives Program (BIP) and the Broadband Technology Opportunities Program (BTOP). The RFI seeks public comment in order to make informed revisions to the first Notice of Funds Availability (NOFA), improve the application procedures, and enhance the overall process of the Recovery Act broadband programs. The agencies’ decision to consolidate the final two rounds into one will afford more time for application preparation and review and enable all parties to benefit from lessons learned. Regardless of the procedures chosen to streamline and strengthen the next round of funding, Pioneer believes that existing service providers must be given the opportunity to respond to applications filed within their service area.

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<sup>1</sup> Pioneer Communications is a wireline telecommunications provider serving ten counties in western Kansas. Headquartered in Ulysses, Kansas, Pioneer has connected rural communities for more than five decades, and today delivers a full suite of services including telephone, cable television and high-speed Internet.

The agencies reportedly received approximately 2,200 applications for the first round of funding.<sup>2</sup> Although applicants researched the characteristics of their proposed funded service areas, Pioneer noticed applications were nevertheless filed in areas that were not underserved or unserved. This problem may be attributed to the fact that in many parts of the country broadband data is inaccurate, not sufficient, or not available. Applicants and more importantly the administering organizations are currently using state, local, and FCC maps to help determine an area's broadband availability and penetration rate in order to determine whether it falls within the Recovery Act's requirements.<sup>3</sup> The RFI asks whether the public notice process should be superseded where data becomes available through the State Broadband Data and Development Grant Program that may be used to verify unserved and underserved areas. Pioneer believes that even as more mapping data or other third-party data becomes available, existing service providers must be given the chance to respond to applications being filed within their service areas. First-hand data from existing service providers is often more reliable than data from maps or third parties because network upgrades, the implementation of new services, and the addition of new customers can change the characteristics of an area before an informational map can be revised. As reliable broadband data is made available through mapping programs, it should be considered along with responses from existing service providers, but not as a replacement. Continuing to allow responses from existing service providers will help ensure fairness and accuracy for all parties involved.

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<sup>2</sup> See Report to Congressional Committees, *Agencies are Addressing Broadband Program Challenges, but Actions are Needed to Improve Implementation*, Government Accountability Office (Nov. 2009)(GAO Report).

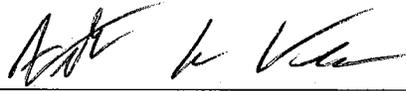
<sup>3</sup> "The agencies face challenges determining whether proposed service areas meet the requirements for underserved and unserved in order to effectively award funds [because of the lack of sufficient data]." GAO Report at 13.

Applicant support and outreach will also promote fairness and accuracy and will contribute to the successes of both programs. Pioneer supports providing informational programs for the second round, including workshops, seminars, and other methods.

Lessons learned from the first round of funding must be applied to the final, consolidated round. Regardless of the new procedures chosen, Pioneer stresses that existing service providers must be given the opportunity to respond to applications filed within their service area.

Respectfully submitted,

**PIONEER COMMUNICATIONS, INC.**

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