Enclosed please find comments to questions #2, #5, #12 and #26 to the Broadband Opportunity Council Request For Comments.

2. How can the federal government best promote the coordination and use of federally-funded broadband assets?

While the previous broadband grants took the first step in the promotion to serve underserved rural communities, there still remains a very large gap in fully achieving that goal – that of stranded facilities. Where previous grants were awarded and did fund certain broadband networks/infrastructure deployment, many of those same communities are now broadband islands – their broadband infrastructure is not connected to other broadband networks beyond their island borders. This isolation does not permit the ability to use these facilities for joint use/shared opportunities whether with the individual state or across state boundaries. In addition, this build out/expansion of infrastructure will provide diversity route options and add a survivability capabilities layer against network disasters.

Applicants for grants through a federally funded broadband program should be targeted and with the express purpose to connect nearby isolated grant-funded broadband infrastructure.

5. How can the federal government best collaborate with stakeholders (state, local, and tribal governments, philanthropic entities, industry, trade associations, consumer organizations, etc.) to promote broadband adoption and deployment?

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Grants targeted with the express purpose to connect nearby, and yet miles away, isolated grant-funded broadband infrastructure is desperately needed to ensure that rural communities are connected to other rural communities to better serve their communities through joint shared opportunities.
12. How can communities/regions incentivize service providers to offer broadband services, either wired or wireless, in rural and remote areas? What can the federal government do to help encourage providers to serve rural areas?

While the previous broadband grants took the first step in the promotion to serve underserved rural communities, there still remains a very large gap in fully achieving that goal – that of stranded facilities. Where previous grants were awarded and did fund certain broadband networks/infrastructure deployment, many of those same communities are now broadband islands – their broadband infrastructure is not connected to other broadband networks beyond their island borders. This isolation does not permit the ability to use these facilities for joint use/shared opportunities whether with the individual state or across state boundaries. In addition, this build out/expansion of infrastructure will provide diversity route options and add a survivability capabilities layer against network disasters.

Targeted grants for the express purpose of connecting these isolated grant-funded broadband infrastructure stranded facilities can provide incentive to serve these otherwise hard to reach and high cost areas.

26. Because the predominant areas with limited or no broadband service tend to be rural, what specific provisions should Executive Branch agencies consider to facilitate broadband deployment and adoption in such rural areas?

While the previous broadband grants took the first step in the promotion to serve underserved rural communities, there still remains a very large gap in fully achieving that goal – that of stranded facilities. Where previous grants were awarded and did fund certain broadband networks/infrastructure deployment, many of those same communities are now broadband islands – their broadband infrastructure is not connected to other broadband networks beyond their island borders. This isolation does not permit the ability to use these facilities for joint use/shared opportunities whether with the individual state or across state boundaries. In addition, this build out/expansion of infrastructure will provide diversity route options and add a survivability capabilities layer against network disasters.

The process to apply and qualify for grants needs to be streamlined. Previous successful BTOP grant recipients should be awarded a preferred vendor status which permits a streamlined application/submission process. These successful past recipients are currently supporting the rural communities with the previously federal funded stranded facility isolation and are better prepared to offer and implement solutions. In addition, should any funding be outside of the NTIA organization, endorsements from NTIA would be very influential in successful deployment of broadband facilities.

Let me know if you have any questions, or wish to discuss. We look forward to hearing from you soon, and we thank you for the opportunity to contribute our thoughts and suggestions.

Regards,
Because success is all about good connections