

**From:** [Nick Guy](#)  
**To:** [BOCrfc2015](#)  
**Subject:** Broadband Opportunity Council Seeks Comment on Ways to Further Expand and Promote Broadband Deployment, Adoption and Competition  
**Date:** Monday, June 08, 2015 5:27:35 PM

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To Whom it May Concern,

My name is Nick Guy. I am the Executive Director of a company called Noel Communications. We provide rural broadband services in the Pacific Northwest. Our customer base includes schools, regional ISP's and small to medium business in predominantly rural areas. We are based in the city of Yakima in Washington state. We directly compete with Northwest Open Access Network, (NoaNet) and share a lot of the same general footprint.

We would love to respond to two of the questions:

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

Our answer to this is to make said assets available to other businesses that need the resources to allow for effective competition. By restricting access to these resources to the organizations that were BTOP awardees has allowed said organizations to essentially corner markets and stymie the very competition that the grants were supposed to encourage. For example, have specifically asked NoaNet to provide access to unused dark fiber capacity connecting Walla Walla, Washington and Clarkston, Washington so that we could competitively serve these communities and the small towns along the route. It would be a simple matter to mandate that unused physical infrastructure be made accessible to facilitate competition. Recipients should be audited to determine capacity. The fact that it is not available is a waste of money and deprives rural America the competitive landscape available in some urban areas.

**How can communities and regions incentivize service providers to offer broadband services, either wired or wireless, in rural and remote areas?**

This is a great question. As a provider in said rural and remote areas we feel qualified to comment in this arena. Local communities and regions could help in the following ways. If they had access to licensed spectrum they could partner with local providers to use said spectrum to provide broadband. As mentioned in our response to question 1 making sure that Federally funded entities are sharing resources is paramount and this also applies to wireless frequencies. Localities and regions could greatly help smaller broadband providers by easing access to utility poles and conduit that are controlled by them. State governments need to restructure their networks to distribute resources less centrally and provide more local connectivity reducing backhaul costs. An example would be two schools in the same town having to have connectivity to the state capital to communicate with each other. Any incentive should not create unfair advantage but should be literally open access to restrict funding to specific entities defeats the goal of increasing competition.

Yours Truly,

Nick Guy

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