

From: Shane Milburn [shane.milburn@klicknetworks.com]

Sent: 8/30/2024, 7:50 PM

To: bead@ntia.gov

Cc: wsbo@commerce.wa.gov

Subject: Comments on the "Proposed BEAD Alternative Broadband Technology Guidance"

As a locally owned ISP that is operating in a very sparsely populated area of Washington State, some of the areas we are proposing to build under the BEAD program will likely be classified under the 'Extremely High Cost per Location Threshold' metric when it is published. We would welcome the opportunity to be able to serve a portion of these BSLs with a hybrid of fiber and unlicensed fixed wireless. Fiber is our preference but there are homes in outlying areas along with some very challenging terrain and the build costs for fiber will be very expensive. Almost to the point that even with BEAD subsidy it may not be worth the investment for a fiber only network at the current time. We could cost effectively provide service to these same homes using ULFW while still meeting speed requirements. This would enable us to use the funds more efficiently and then look at ways to upgrade those locations to fiber at a future date.

We also have concerns over LEO Satellites overbuilding all project areas but feel that in some scenarios they may be the only option to serve some areas around the US. We would strong urge NTIA that only after States Broadband Offices have exhausted all other opportunities to find traditional or fixed wireless operators to serve a given project area that they consider LEOs.

Feedback on the document and questions in 'Appendix A' have been made with comments in the attached PDF. Thank you for your time and consideration on the use of Alternative Broadband Technology.

cheers,

-shane

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