

From: Ariane Schmidt [aschmidt@broadlinc.org]

Sent: 9/9/2024, 6:26 PM

To: bead@ntia.gov

Cc: aschmidt@broadlinc.org

Subject: Comments on Guidance for Eligible Entities on Choosing Alternative Broadband Technologies for BEAD Program

Dear NTIA,

The Spokane Regional Broadband Development Authority Broadlinc respectfully submits comments for consideration on the review of eligibility for alternative broadband technology in BEAD Program projects alongside fiber proposals for which a fixed intersect is calculated when fiber deployments are prohibitive due to one or both of the below:

- (1) Difficult topography
- (2) Difficult geology

Each of which cause an unserved and/or underserved Broadband Serviceability Location (BSL) with to incur a very high fiber per passing cost when an alternative technology may provide as reliable service as fiber.

We would like for NTIA to provide State Broadband Offices (SBOs) in writing and without additional NTIA review the ability to calculate a technology threshold (different than high or extremely high-cost threshold) that becomes the trigger for which hybrid, or alternative proposals, are compared alongside to fiber proposals. This threshold is a calculation of the total state allocation divided by the total FCC approved BSL count for the state. For example, in WA the technology threshold would be

$\$1.24 \text{ Billion} / 310,000 \text{ BSLs} = \4000 per BSL.

This means a BSL that can be connected to fiber at \$4000 or under will be given a priority for fiber ~ testimony in the 2023 WA Legislative Session indicated the average price to extend a new BSLs within current fiber plant (10%-20% radius) is closer to \$2500. Hence, this still gives public and private Internet Services Providers (ISPs) considerable margin.

For BSL connectivity to fiber that is above \$4000, hybrid, or alternative technologies, would be scored alongside fiber proposals for award.

This is the only way internet for all, instead of fiber for some, will be achieved.

The below short 1 min video is an example of this approach. Thank you for your consideration.

Semi Fixed Wireless Showcase Recap Video - Broadlinc<<https://broadlinc.org/recap-video->

[showcase/](#)>

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