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Sent: 8/29/2024, 2:22 PM
To: bead@ntia.gov
Cc: jeff@advancedisp.com
Subject: Proposed BEAD Alternative Broadband Technology Guidance

NTIA,

We are a Fixed Wireless and Fiber Optic Operator based out of Yakima, WA. We operate in both Yakima County and Benton County. We have a wireless footprint approximately the size of Delaware and believe that NTIA needs to reconsider their approach to serving unserved/underserved communities for the purpose of BEAD. Fixed Wireless ISPs exist for a reason. We are embedded into our communities already and DOING the thing that BEAD is trying to accomplish. There are thousands/tens of thousands of excellent operators nationwide. We all share the same goal to provide rural access and a growing number of ISPs are embracing this new generation of Fixed Wireless. We believe that NTIA/BEAD must recognize that the technology market for operators is explosively driving speeds up and cost down. We also hope NTIA recognizes that in order to provide the households and businesses with bandwidth they must embrace all viable technologies TOGETHER to accomplish BEAD.

Per your publication "<https://www.ntia.gov/sites/default/files/publications/bead-alternative-broadband-technology-policy-notice-for-public-comment-final.pdf>" you label "other broadband technologies" in a category that is offset from "Reliable Broadband Service". I believe this is misleading and does not reflect that current technology offerings that are available to operators. As a fixed wireless operator who exists to fill a void in availability to rural households and businesses, I believe the services rendered by our company would absolutely meet the "reliable" threshold. As we have grown to serve our community our customers and businesses have grown to rely on us for that particular reason, we are reliable.

We implement a stack of Unlicensed Fixed Wireless, Licensed-by-rule Fixed Wireless, and Fiber Optic. Through the use of mmWave Point-to-Multipoint unlicensed Fixed Microwave Access we are able to deliver speeds that rival fiber optic while maintaining very high levels of availability of service. Through combining our mmWave technology and our licensed-by-rule Fixed Wireless offerings we are able to provide BEAD compliant speeds of 100/20 to an overwhelming majority of BSLs in the project areas for BEAD in our local area. The reality of our deployment is that we will be cheaper to construct, cover more houses faster, and be able to maintain the network for less money than a traditional wireline operator would be able to. Fixed Wireless Internet is able to directly attack the high-cost threshold locations where Fiber Optic would be too expensive to deploy and deliver services that allow users to have the digital equity that someone in a less rural location would be able to achieve.

I particularly am concerned with the verbiage in section 4. Awarding Alternative Broadband Technology Subgrants 4.1 Selection Mechanism - and particularly point (2).

Understanding that Fiber Optic is the overall goal for this grant and subgrantee selection will prioritize this, I believe the "reliable technologies" and "other broadband technologies" definitions have such a wide gap between them that it fails to clarify the capabilities of specific equipment in each category. In the "reliable technologies" category you have Licensed Fixed Wireless which only has to provide 100x20 for BEAD whereas in the "other broadband technologies" category you have Low Earth Orbit Satellite providing 100-400mbps speeds and mmwave and some nGFWA technologies providing potentially beyond 1Gbps which exceeds the BEAD requirement for fiber optic even. I believe that all technologies should be evaluated and applied as specific project areas demand. In your current plan "other broadband technologies" will not be considered unless there are no other applications. I believe this is not an economical approach and will not be the best way to approach covering all of the BSLs for BEAD.

I propose that projects be evaluated on a 2-tier system as opposed to your suggested plan. Fiber Optic projects will be prioritized if they make economical sense, followed by all submissions for non-Fiber Optic "Reliable technologies" and "other broadband technologies" together.

I call on NTIA to re-evaluate and modify current guidelines for BEAD to allow Unlicensed Fixed Wireless/Alternative Broadband Technology to be utilized by operators for BEAD and further be considered favorably while utilizing these technologies.

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