



National Telecommunications and Information Administration (NTIA)
1401 Constitution Ave., NW
Washington, DC 20230

September 10, 2024

RE: Proposed BEAD Alternative Broadband Technology Guidance

Dear NTIA Officials:

Thank you for your tireless efforts to launch the Broadband Equity, Access, and Deployment (BEAD) Program. We respectfully submit these comments in response to your proposed BEAD alternative broadband technology guidance.

Founded in 1955, BroadbandMT represents locally owned, community-based rural broadband providers that operate throughout Montana. BroadbandMT members employ over 1,000 Montanans and invest nearly \$100 million annually in capital and operating expenses to deploy broadband infrastructure to the communities they serve.

Given that participation by alternative technology providers was inevitable in a program that requires a solution for every location, BroadbandMT welcomes your efforts to define a process and expectations of these providers in BEAD. Our state is among several that will decide whether to adopt this guidance as part of its approved Initial Proposal Volume II, and Montana is in a particularly unique situation having already opened its main application round for subgrantees.

This guidance should underscore that low-earth orbit satellites (LEOs) and unlicensed fixed wireless (ULFW) are options of last resort after Eligible Entities have prioritized the deployment of fiber infrastructure to as many locations as possible, followed by other reliable broadband technologies. Alternative technology providers may have a case to serve isolated locations where more scalable broadband may be cost-prohibitive, but any participation beyond that undermines BEAD's intent of maximizing reliable broadband service in rural America.

While this draft guidance creates a needed procedural framework, there remain significant technical, sustainability, and strategic questions for even a limited deployment of alternative technologies as a stopgap solution in the BEAD program. We urge you to strongly consider comments on this draft guidance as submitted by ACA Connects and NTCA – The Rural Broadband Association, for we align with their recommendations.

We present two additional concerns about the proposed guidance:

- The language is unclear regarding BEAD eligibility for locations that are served by LEOs or ULFW. As we understand it, alternative technology providers would not be funded for locations that are served by like technologies at the requisite speeds. We agree with

this approach to avoid wasteful spending of limited funds. What remains unclear, however, is whether those locations are also taken off the board for interested fiber providers. Specifically, this sentence on Page 8 of the proposed guidance: "If Alternative Technology service is already meeting BEAD program requirements, then BEAD funds are not necessary for those locations and will not be allowed."¹ If read strictly, this language would conflict with the BEAD Notice of Funding Opportunity (NOFO), per this excerpt from Page 28²:

4. Program Fund Allocation and Notice of Available Amounts

a. Criteria for Reliable Broadband Service

For the purposes of the BEAD Program, locations served exclusively by satellite,³³ services using entirely unlicensed spectrum,³⁴ or a technology not specified by the Commission for purposes of the Broadband DATA Maps,³⁵ do not meet the criteria for Reliable Broadband Service and so will be considered "unserved."³⁶

Please clarify in the final draft of this guidance that fiber and other reliable broadband service providers may apply for locations that are served exclusively by LEOs or ULFW.

- The proposal's new process for alternative technology providers to claim where they already serve is coming at a time when most states, including Montana, have finished their map challenges. Nevertheless, consideration should be given to extending this process to all providers to dispute any new claims. Enforceable commitments, planned service, and other new information may have changed the landscape of BEAD-eligible locations in states where the challenge process has come and gone. Maximizing the value of every BEAD dollar depends on up-to-the-minute mapping and location statuses. Limiting this claimed service process to the alternative technology providers is a missed opportunity to improve the entire program – we hope you will reconsider its scope.

Thank you for your consideration. We appreciate the ongoing collaboration with you to bring reliable broadband service to more Montanans.

Sincerely,



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¹ [bead-alternative-broadband-technology-policy-notice-for-public-comment-final.pdf \(ntia.gov\)](#)

² [BEAD NOFO.pdf \(doc.gov\)](#)