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Sent: 8/27/2024, 2:09 PM
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Subject: BEAD Alternative Technology Plan comment

To Whom It May Concern:

I am submitting comments on the BEAD Alternative Technology plan as an elected Supervisor for North Star Township, an organized township in northeast Minnesota. Our township has been working for over 15 years to attract one or more broadband providers to our rural township. Thus far, our efforts have failed due to several factors: 1) there are no broadband providers sufficiently close to North Star Township to consider deployment, 2) our population density is relatively low - we have 85 residences, 200 residents, perhaps 36 seasonal cabins, and no free standing businesses, 3) our geography includes much topography around rivers and lakes and dense conifer forests, making wireless technology extremely difficult. Options at the current time include ATT hotspots and various satellite options including Viasat, Hughesnet and Starlink. As we live in a lake district fairly near Duluth MN, our population are educated, many professionals, and a mix of ages.

I want to comment on the NTIA plan for the BEAD Alternative Technology plan recently made available for comment. I will focus on LEO, because DSL is generally not available in my township. Centurylink is the phone provider and they have largely abandoned our area. Much of the copper infrastructure is pretty old and those who still have a landline get terrible service from Centurylink. We have worked with Centurylink in the past, but have been told that they simply are not interested. It is hard to imagine the large amount of infrastructure that would be needed to upgrade to DSL in our rural area.

Starlink has been adopted by many families here, including mine. My experience with Starlink is that it is 1) expensive (\$120/month), 2) unreliable and 3) unavailable to many people who live in our forested area with dense conifers and valley topography that prevents a clear north view for Starlink. My experience and that of my neighbors is that, while Starlink can deliver very good speeds >100Mbps and decent upload speeds (often >10Mbps), the Starlink system frequently goes down to unusable speeds (<5Mbps and often zero), the system goes down completely too often, and speeds are highly variable all the time.

At this time, LEO systems cannot guarantee service to all locations in North Star Township due to topography and dense forest. We also realize that LEOs have limited capacity for #locations/area. LEOs cannot be expected to offer low cost service at, let's say, the ACP rate, and as an example, many residents in North Star say they simply cannot afford Starlink's monthly subscription cost. The benchmark of 5Mbps to each location in the Alternative Technology Plan is simply not sufficient to support modern usage. Affordability of monthly subscriptions must be a requirement....the ACP cost can be a benchmark. It is not enough to ask state programs to support the start-up equipment cost. Monthly subscription cost must be kept low for lower income families.

I would recommend that LEO providers be excluded from the BEAD Alternative Technology plan, as it is extremely hard to imagine their meeting the requirements for enforceable commitment and ongoing network performance monitoring. Most LEO programs, including Starlink, are still in a startup mode, sending hundreds of new satellites up and now starting to deal with obsolescent units coming down. It is very hard to imagine LEOs committing to affordable deployment to all locations in North Star or other forested rural areas for any reasonable length of time to make them reliable, affordable, and future-proof broadband service.

Thank you for the opportunity to comment.

Janet Keough, Supervisor
North Star Township, Minnesota