

Name	Organization	Comment Format	Comments
Matthew Cretul (matthew.cretul@marionfl.org)	Marion County BOCC	Public Comment Form	Applicants should be required to submit applications to LTPT's.
Charlie Dudley (cdudley@flapartners.com)	FL Internet & Television Assoc.	Public Comment Form	<p>Legislation has set \$5M, 50% match, and 25/3 perimeters. Would be nice if it could be tinkered with. Weighting a little higher on scalability and reliability. Must have project follow through and applicants must be capable of doing what they say they can. Use of P.E., some companies use someone who may have a national certification or similar certification with expertise. Hybrid approach is definitely scalable. Projects not disadvantaged because they do not solely use fiber. This is a large and diverse state and there is not a one solution fits all approach. Important to have applicants who can actually deliver to prevent program from failing. Need to embrace all technology. A lot of money so we need to get this right. Applicants should be giving their clients federal resources. Need focus on unserved areas and then begin to focus on underserved areas.</p>
Jack Phillips (jack.phillips@ftr.com)	Frontier Communications	Public Comment Form	Fiber deployment is critical in these areas. Section 4- may to be quick of a turnaround for 3 days. very cumbersome process. \$5M budget cap too small, \$10M budget in other states, to do project properly the budget needs to be bigger. Portal is difficult and will present a bunch of problems, and application being submitted via email is easier and eliminates the issues with portals. Reimbursement process, will they have to wait until the end of the project to get reimbursed?

<p>Jeff Scala (jscala@fl-counties.com)</p>	<p>Florida Association of Counties</p>	<p>Public Comment Form</p>	<p>Section 1& 2- Incorporations & Definitions - Unserved & Underserved. Must offer ACP- understand if area is served. Section 9&10 - community engagement Strategy 21- can there be a requirement for LTPTs, proof of support from the local level. There needs to be a requirement of local interaction. This program is about deployment, maybe providing resources to help applicants applying. Reimbursement is scary for fiscally constrained counties because they do not have the money to set aside, deterrent for counties that need these funds. For the challenge process there are not penalties for not delivering, community will eventually be left behind. Needs to be clarity there in the challenge process. Program is about deployment there needs to be clarification for scarcely funded communities to make sure they receive the help they need. More explanation on what is rural, unserved, and underserved. It will expand more for the program and limits federal blowback.</p>
<p>Michael Langton (mlangton@langtonconsulting.com)</p>	<p>Langton Consulting</p>	<p>Public Comment Form</p>	<p>Regarding application documents, does applicants need to address every strategy? Soften and loosen some of the requirements during different periods of the process. Application overly burdensome, far too difficult. Can entities apply for multiple grants as long as it is not in the same neighborhood? Does the term no federal funds awarded include the RDOF? "Not funded more then 50% when combined with any state or local funds" What does this mean? How can this be interpreted (the statute)? Get a better explanation from the legislature because there are communities uncertain about the statute "you must address the goals and objectives of the state plan" but the state plan has no goals or objective, there are only 25 strategies. I assume you are referring to the strategies and if you are do applicants have to address every single strategy? Is 130 points the minimum to move forward in the grant application process? When do you anticipate the first grant rollouts will be? Is there a timeline? Will it be this calendar year?</p>

<p>Dana Smalley (dana.smalley@dzsi.com)</p>	<p>DZS Inc. (Equipment Manufacturer)</p>	<p>Public Comment Form</p>	<p>Is there a estimated cycle time for them to obtain their funding? Is there an actual definition of what a project is? Does it have to be a single rollout? Does it have to be a single purchase order? If a company that is here in Florida but also has multiple locations that they are trying to get funded in another state, is there a conflict of interest of what they can apply to with and without the state? HQ is in Florida but has locations in other states are they able to apply to other things?</p>
<p>Albie Kaminsky (albert.kaminsky@charters.com)</p>	<p>Charter Communications (Spectrum)</p>	<p>Public Comment Form</p>	<p>\$592M investments in just 2020, have expended out to 123,000 homes in 2020 Adoption component -> affordability promoting services and Cap Ex. 800 thousands miles of network across the country. 2.9M customers. Ranked U.S. news world report best internet provider for rural areas. Adoption standpoint, affordability standpoint half the battle is educating. They have \$18 a month program for qualifying households. Charter has committed a million dollars for digital education. Want to continue to be apart the process and grant program.</p>

<p>George Buckner (gbuckner@cfec.com)</p>	<p>Central Florida Electric Cooperative, Inc.</p>	<p>Public Comment Form/ Workshop comment</p>	<p>What does the state define as broadband Internet services? There aren't any challenges/penalties for lack of follow through. No penalties for a challenger, would be nice if there was some type of penalty in the event that a challenger won their challenge but did not provide the service. Nothing about Competing Technologies, if a wireless internet provider is in the area already but we have someone who is able to implement fiber is there priority for that challenge? Scoring Matrix: the following items from section E should be relocated to section F, merging E&F ensures skin in game for planning team. Match of non state funds, the verified financial commitment of non state funds, this overall would increase this portion by 20 points if points are brought over which would make the financial viability of the project a little bit more weighted and have it be more then 130 points, nice for someone who does not have enough money to finish the job to get that grant funding. Rest of section E should just be community support and that would include evidence of community support in the LTPT and it should be merged with section F, this would increase section by 45 points and make the overall aspect of this grant funding opportunity mean a little more. Would create more skin in game for LTPT planning team with all the work they have to do. Some of the grant money should be handling the challenging process, if there are multiple grants available then it should be challenged if there are RDOF funds available and they are currently ready to begin the process of implementing service. Would be nice to create skin in the game if the state of Florida offered a no interest loan with the funding this would help with smaller communities wanting to participate.</p>
<p>Derek Cooper (derek-cooper@comcast.com)</p>	<p>Comcast</p>	<p>Public Comment Form</p>	<p>Timeline for reimbursement? DZS - manufacturer of BB equipment Project definition? HQ in Florida but other locations in other states, what are requirements to apply for funding? Largest provider in the state of Florida, founded in a rural county, experience in serving rural counties. 3.8 billion invested in 49 counties. Wants to be apart of the solution. Digital adoption is important to them, served over 1 million low income Floridians.</p>

Kent Winrich (kent@openbb.net)	OpenBroaband	Polk Workshop Comment	Fiber is good but the timing on being able to deploy is a long time and people do not have time to wait, use a hybrid approach in the state is a quicker deployment technique. Encourage them to look into hybrid. A lot of people push fiber but not efficient, people need internet now. Suggests hybrid and a much quicker technique. Agree with comments about cap, making the cap bigger would make deployment quicker and
Matt Mucci (mm179w@att.com)	AT&T	Polk Workshop Comment	Want to be apart of the solution to make this happen. Works in 30 wireline counties. Tampa to Orlando, in the past three years have invested over \$700M in funds, \$60M in Polk alone. Want to concentrate on digital divide in rural communities. \$30 program and wants to be at the table.
Matt Kreagle	Polk BOCC	Polk Workshop Comment	Change scoring, LTPTs looking at applications, want more skin in the game as they doing a lot of work and know what is best for communities. Have added scoring for LTPTs.
H.B. Holmes (hbholmes@rhemafi.com)	ISP in Polk	Polk Workshop Comment	Consideration should be given to minority and small businesses. Anchor institutions, a lot of these are faith based institutions in Hispanic and African American communities. Need to be considered as well.
Peter Murray (petermurray@densenetwork.com)	Dense Networks	Polk Workshop Comment	Will you be reinstating monthly meetings with LTPTs, very helpful and help relay routine information at these meetings.
Armon Lowery (alowery@newberryfc.gov)	LTPT Regional	Polk Workshop Comment	How does this initiative roll out?(LTPTs). Please consider the rural areas (union county, Bradford, Gilcrest county). Lack of understanding on how this initiative is supposed to roll out.
Keith Deluca (keith.deluca@parsons.com)	Parsons/FDOT	Polk Workshop Comment	Really interested in unserved and underserved regions and they're very important. During COVID individuals needing to see a doctor who had online appointments forced individuals to struggle with healthcare options. Lots of space conduit. Always looking to team up with individual in the room that are able to deliver.

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Shannon Roberts (shannonr@suwcountyfl.gov)	Suwannee City BOCC + LTPT	Santa Rosa Workshop Comment	<p>Suwannee County residents are excited about growing broadband internet projects. Students issued Chromebooks but lack adequate internet service to complete remote school work. Chronic barrier to life in rural communities. Recognizes the significant challenges for the office. Buses being used to deliver Lunches & Homework. Speed test data and layout is confusing, it can be misunderstood, and can be misleading. Category ranges seem arbitrary. Lobby to change the map to have a different breakdown of data. Suwannee county is a RAO county and cannot hope to leverage the grant and cannot afford to match the funds. More comments to come. Speed test color code is confusing. Breakdown data more for map. Match should be waived for RAO/rural counties. ARPA funds should be used to match funds. Asking to remove financial barriers. REDI + State should pay or waive match. Application too complex (See NTIA app.) remove some requirements into the scope. Challenge process should be harder and it is too easy for them to currently challenge where things currently sit.</p>
Jim Peacock	Jackson BOCC	Santa Rosa Workshop Comment	<p>Been working 6 years on broadband in Jackson County. 50% match is very difficult for fiscally constrained communities, hopefully some means to alleviate the match to make it easier on counties.</p>
Spencer Pous (spous@bluebroadband.com)	Blue Broadband	Santa Rosa Workshop Comment	<p>Hybrid provider that focuses on fixed wireless. Fixed wireless section, fixed wire can be done faster, cheaper, and sometimes even more reliable. Make sure it is being considered in this process especially when there is limited funds. In the future when funds run out there will not be enough to maintain services. Lots of small ISPs in the areas that have used personal funds. Large owned companies getting the money, make sure that small companies are being consideration. Need more county broadband offices.</p> <p>What's to keep a company from data mining with the map process, there is no geolocation locking. Think its hard to get accurate data through this method. Is there a way as a provider to filter results to see how they are performing in that area?</p>

Kent Winrich	Open BB	Santa Rosa Workshop Comment	Regional, local, and hybrid provider. RF, Fiber, Wireless experience. Cost per mile for fiber is not as accurate for cost per household. Cost per household is variable in rural. Symmetrical vs. Asymmetrical, when you use symmetrical you do not use all the tools in the tool box. Noticing 20 to 1 ratio so everything is very asymmetrical. Fiber products out two years and people do not have time to wait this much. State should be very strict in their guidelines regarding timeframes. Suggests bonus points for hybrid because it guarantees service for everybody. Lets concentrate on getting service to rural people. Local companies really care and actually willing to solve these issues. The big guys should not get all the funds.
Jeff Brewer	Tri-County Electric Co-op	Santa Rosa Workshop Comment	Building Fiber network to 13,000 people. 65 million dollar funding needed for project that has already been started. No member should be paying out of pocket for fiber expansion. RDOF funding is an issue, future funding there should not be a statute if there has been federal funding received there should be the opportunity to receive state funds. Are we able to be retroactive to receive funding for money we have already spent? Getting funding reduces the debt for rural communities who are going to be responsible for paying back these funds. A lot of poverty in Madison county and people are suffering. Elderly cannot do telehealth appointments and kids cannot do school work. Do whatever to ensure funding is funneled to rural communities
Shiloh McPherson	FAC- Access 67 Initiative	Santa Rosa Workshop Comment	Supports draft rule. Members are unsure of the eligibility based on the current speeds that they have. Clarification on the front end, perhaps through a GIS layer on the faster Florida broadband map could prevent local governments from using scarce resources and grant development and challenge processes. For small local governments and specifically fiscally constrained counties, capital projects are difficult to initiate through reimbursements. AC respectfully requests the office to reconsider reimbursement language for government applications. BB Summit in January @Sawgrass Marriot
Albie Kaminsky	Charter	Santa Rosa Workshop Comment	Discussed their expansion. Network stretches 800,00 miles. Second largest provider in the U.S. but first largest provider in rural communities. Serve 9 difficult cities in Florida (Panhandle). Want to be apart of the solution and has started being apart of the solution. This has been a problem in counties for a long time. There is no one size fits all solution. RDOF is 18k location, 455 Escambia, 445 Jackson.
Ryan Campbell	Escambia Electric Co-op	Santa Rosa Workshop Comment	\$5m Cap is too low, adequate for a small project but not efficient for a large project. Wants \$5M cap reconsidered. Consideration should be given for density.

Kristen Longley	Cox Communications	Santa Rosa Workshop Comment	Cox is committed to communities. Largest privately held company in the U.S. 6,000 miles in Florida and 550 employees in Florida Committing \$400M to rural communities in the country. Committed to closing the digital divide. Leader in digital equity. Any area they connect to is \$9.95 and is 100 megabits per second. Seeking out public and private partnerships. Committed to serving local area, \$1M in the last year in Gulf Coast.
Eddie Thompson	AT&T	Santa Rosa Workshop Comment	AT&T committed to fiber. \$300 M in the last year in Florida. Will scoring criteria flex/waiver at all? Is it going to change scope? Discussed their fiber build. Will email further comments.
Ed Carson	Chair of First Place Partners	Santa Rosa Workshop Comment	Located in Santa Rosa & Escambia County. Knows nothing about broadband but wants to be involved and knows that there is a need.
General question		Santa Rosa Workshop Comment	All input will become public record. All input will be made available during Notice of Proposal. Rule Activity.
Michael McWaters	Suwanee Valley Electric Co-op	Santa Rosa Workshop Comment	Personally thanking Katie and Kiwanis. Want to be involved as a local company. When it is implemented by a local entity then it becomes a community owned asset. It will not be owned by big cooperation's and would like this to be taken into consideration.
Craig Coffee	Okaloosa County	Santa Rosa Workshop comment	Seasoned when it comes to ARPA. Spending 2 million dollars to connects schools with fiber. Criteria not geared towards middle mile Offering discounted rates to fiber and towers. Criteria too strict to allow everyone to be involved. Want more then one provider, competition with multiple providers.

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D.J. & Robin McGlotheran (djmcglotheran@gmail.com)	Glades County County Small Business Owner	Comment Card/ Workshop comment	<p>Concerns with Lumen not providing high speed internet at their business location, problem would cost \$752,900. Address in program/rule making how companies can provide "good" internet by upgrading from copper to fiber. Needs high speed internet. Are we still addressing the communities need? Where do public service utilities fit into this? Cables Infront of the home but they are exhausted and cannot tap on to them. D8Why are local companies not being utilized 50% match will be a problem, there will be left over funds for the Broadband opportunity program.</p> <p>Reimbursement another issue and a burden on corporations and county government who have low funds</p> <p>Can one company come in and take over where another company has bad cable in place?</p>
Jeff Brewington (jbrewington@gladeselectri c.com)	Glades Electric Cooperative, Inc.	Comment Card Workshop comment	<p>Grant application less burdensome, maybe simplifying application. Implementation of 2 step price</p> <p>Allow federal and state grants, limitation hurts implementation of project. Would need \$60 million for entire project</p> <p>"Safe streets for ALL" can be a good model (FDOT), take a look and maybe use as an example</p>
Donna Storter	...	Comment Card	<p>First speaker (after welcome and intro) did not properly use the mic, attendee could not hear, presentation not audible for back of audience. Asks that presentation be sent over.</p>
Tracy Whirls (twhirls@swfrpc.org)	Southwest Florida Regional Planning Council	Comment Card	<p>Can you share the PowerPoint?</p>
Kristin Longley (kristin.longley@cox.com)	Cox	Comment Card	N/A
Spencer Pous	Blue Broadband ISP	Comment Card	N/A

<p>Jeff Brewer (jbrewer@tcec.com)</p>	<p>Tri-Electric Cooperative</p>	<p>Comment Card</p>	<p>Many unserved members in our service territory. Prohibiting state funding if areas have received federal funding through RDOF does not help citizens. Allow funding from state regardless of other funding sources. Requesting date set that allows grants to be retroactive as we are already starting projects to serve underserved areas. Board of directors committed to bringing broadband to all of the Tri-county members and network will be owned by members of tri-county electric. Any funding given will reduce the debt burden of tri-county electric. Grant application extremely complex for entities with limited resources. Can application be simplified with more complexity if a grant passes certain thresholds.</p>
<p>Michael S. McWaters (mmcwaters@svec-coop.com)</p>	<p>Suwanee Valley Electric Cooperative, Inc. / Rapid Fiber Internet. LLC</p>	<p>Comment Card</p>	<p>Grant application too complex, requests too many details and data. Rural areas are least capable of preparing complex application, perhaps a two phased process. Less data to determine if applicants meets minimum score of 130 and then more data for those who advance to second phase. Can single entity apply for more than one grant is there are different service areas involved? Does the language "no federal dollars awarded to an entity" include RDOF allocations? What exactly does the language mean " when combined with any state or local funds" pertaining to 50% match requirement? Why prohibit areas to get state funding they have any federal funding? Must applicant speak to all 25 strategies? Is application rejected if you don't achieve at least 130 points? Is the cure period negotiable? Would state consider awarding additional points for systems that are member owned such as electric cooperatives? Groups for speed test are too broad.</p>
<p>Albie Kaminsky (albert.kaminsky@charters.com)</p>	<p>Charter Communication</p>	<p>Comment Card</p>	<p>N/A</p>

<p>Ryan Campbell (raysn@erec.com)</p>	<p>Escambia River Electric Cooperative</p>		<p>Density of the resident receiving broadband should be considered. If company A will only serve down to 6 customers per mile and company b is willing to run 10 miles of fiber to serve 1 customer it is important to consider both their willingness to serve residents others are not willing to serve and also much higher cost per customer speed. As density approaches 0, any profits also approach zero or even negative. These residents still need fiber access. However, it is exponentially more expensive to provide access to them and to continue to service this fiber for years to come. \$5M cap may not be enough for these low density areas to convince companies to move forward.</p>
<p>Laura Perry (6gators@johnsonprewitt.com)</p>	<p>Henry Regional Med Ctr , UF Doctoral student</p>	<p>Comment Card</p>	<p>Internet access is the currency of society education, healthcare, finance. Our county is being denied access to these things purely because we choose to live in a rural environment. Doctoral student, works at hospital can not properly succeed because of low internet speeds and terrible internet access.</p>
<p>Ambrose Bethel (abechtel@swtrpc.org)</p>	<p>SWFRPC</p>	<p>Comment Card</p>	<p>What is the Florida Office of Broadband mission statement? How open to change is the grant? It seemed attendees more unsatisfied with the current grant stipulations. Is it because they don't understand resources that are available to them? How much technical assistance is available to prospective applicants? Have you considered subdividing the grant to focus the requirements for the needs of individual counties/regions? Florida has such varied regions it seems impossible to include them all in one proposition.</p>
<p>Greg Weiss</p>	<p>BOCC, Access 67 Palm Beach City & Naco</p>	<p>Workshop Comments</p>	<p>10 points is not nearly enough for Local involvement, should be mandatory. 50% match for many counties this is going to be a non starter, needs to be reviewed or maybe eliminated. Evaluation upon completion, how will service be measured, how will service levels be measured? No measurement for uptake in adoption, how do you measure success? How will we address and measure sustainability? Speed test, how will speed be tested for? Terrestrial based projects needs to be an option, technology is moving forward and we need to be moving forward.</p>

Terry Bouroughs	Small City coalition		What type of oversight on public utilities on implementation of service? The match and reimbursement process will kill the project before it even begins. Not feasible for many of these counties.
Keith Deluca	Parsons	Workshop comments	Access 67 & LTPT support. Support mapping initiative Eligibility- Treasury guidelines & federal regulations help expand the aid unserved and underserved areas. Strategy 21 of strategic is a requirement, should be more than just saying. There needs to be support on the local level for the project. Need to be given more points for this. Waiver of match of applicants if they are rural local government (Use strategy 4 as an example). Promises made/promises blocked in challenge process, needs to be specifically addressed. Scalability beyond current processes. Continue to share data.
Eddie Labrador	FAC Genral Counsel	Workshop Comments	50% match hard to do. Partial payments 20%/20%/20%/20%... Etc., Bulk payments not a good idea. Speed tests- need more conversations, easy for them to be inaccurate. Challenge process a good thing, needs to be implemented. Maps are not worth much.
Mark Ekway	Myakka communications	Workshop Comments	\$5 million per application. Wants to submit multiple applications is loan repayment both principal and interest on a loan an eligible reimbursement? Can we look at loan expenses (puniciplet interest) to be considered match and/or reimbursable. P3 of scoring look @ < 10/1 an dnumber of pts. What would happen if one area at 10/1 speed and 25/3 speed in same area? Doesn't provide points for areas under 100/10 in point rubric. Is there prioritization for speed tests data. FL speed tests data is good to use. NITA / MLab/ data should be considered thru narrative. Leverage timelines w/ application cycles with BOP/ Fed \$/ etc. so applicants can weigh options.
Peter Domingez	IBT Communications	Workshop Comments	Assisted with COVID grant previously engineers. Now they are better positiond to apply. Match is hard for small communities to come up with. Private ISPs will drive this and communities will struggle to apply.

Steve Elias	Pennomi-	Workshop Comments	More emphasis on scalability.
Marcos Montes de Oca	Glades City Manager	Workshop Comments	Cannot afford 50% and cannot afford the five million. What is the definition of a project? Communities are on city borders. Projects need to be reviewed on project not population density.
Tim Stanley	Glade BOCC	Workshop Comments	Unserved and underserved taken into consideration. Application easier for larger communities since they have more staff, keep this in mind for fiscally constrained communities. 50% undoable for fiscally constrained counties as well is the reimbursement, need to be taken into consideration. Needs wifi for phone service, now has a landline installed due to lack of service.
Kelly Owens	Okeechobee City Commissioner	Workshop Comments	Fixed and terrestrial service is lacking in the conversation. Time to deploy can be long for fiber as well as the cost for a fiber to fiber project is very costly. What is the main priority for the DEO? Is it to be done in a timely fashion? Provide infrastructure that will benefit economically the communities? Or is it to provide the most scalable most long term solution for the communities? Broadband and economic impact being weighed equally, does not think it is fair and this does not support the objective of this program. 1 third 2 third favor to economic development. Need to define an acceptable project timeline. Emphasis on hybrid fiber wireless. Run a phased approach. Review economic development needs to weigh more. Small ISPs need more of a focus on this in application commentary on project timelines. Hybrid fiber/wireless projects and phased approach. 1. Get communities off DSL 2. Speed requirements are off 3. More emphasis on partnering with communities 4. proportional weighting on

<p>Lou Elliot</p>	<p>Streamline internet</p>	<p>Workshop Comments</p>	<p>\$5M too low. Cost per subscriber may be more than we realize. Lacking in this conversation specifically has been around terrestrial based wireless and fixed wireless services. Two issues with a full fiber to fiber network. The first is the cost to deploy is a very high figure. Time to deploy is also very costly. What is the DEO's priority, deploy broadband in a timely fashion to those that don't have it, is it to provide a, to provide infrastructure that will benefit economically the communities or is it to provide the most scalable long term solution for the communities? I think that should more so be waited in a one third, two third favor to economic development, not fair and does not support this programs objective if we equally weight broadband and economic impact. Needs to be scoring criteria for small business. Scalability is a concern. Think it's very important that you wait the local community partnerships at a two third one third ratio. Regarding project waiting for the speeds. Go with the proportional waiting methodology, allow the applicant to hypothesize a percentage mix that falls under those three buckets. And then weight the points out accordingly with that. Allow ISPs to white white label their services on top of your fiber. Place an emphasis on requirement of open access.</p>
<p>Jason Mitler</p>	<p>Fort Pierce Communications</p>	<p>Workshop Comments</p>	<p>Project is not defined. What has determined the five million limit? Scalability is is important. 5 million may not be enough with the cost per customer, cannot get full utilization with 5 million.</p>

Derrick Cooper	Comcast	Workshop Comments	<p>A part of the solution. Participation \$3B in the last 3 years. In service in over 49 counties, Comcast is the largest provider in the state of Florida, humble roots. Making sure that the program adheres to Florida state law requirements. Seems to be from the grant process proposed and looking at that chart that only points and funding will go towards areas unserved below that 25/3. Don't know if that was intentional or if there will be points scored for those that are maybe above 25/3, but unserved under the state definition of 100/20. Draft program contains requirements not required under state law and this does not take into account investments already made in Florida, \$3 billion since 2017. Wanting to meet more people. Some adjustments to the point scoring criteria should be made particularly increasing points. Especially on project viability and scalability of project readiness, and even on the non-state matching funds and then into challenges.</p>
Terry Burroughs	Small City Coalition	Workshop Comments	<p>LTPT needs to be place to manage and make sure respective Communities get their funds. FCC may not accept state's definition of unserved or underserved and ISPs need to be accurate. Alter reimbursement language for physically constrained counties. Need to really start to think about how we are really going to implement broadband. Challenge process is a grant blocker.</p>
Ian Conner	AT&T	Workshop Comments	<p>AT&T want to be apart of the solution, colleagues on LTPTs around the state. Has invested just over 3 billion in the last three years. Want to be apart of conversation and part of the solution.</p>

Name	Organization	Comments
<p>Scott Layman (s.layman@meridiam.com)</p>	<p>Meridiam</p>	<p>Meridiam projects Suggestions about broadband opportunity opening their definition up to underserved not just unserved communities Applicants should be require to create plan on how they plan to serve low income communities Suggestion to provide clear definition of broadband to awardees based on network delivery type not just speeds Prevent using grant funding in areas with fiber based networks Instead of premises passed by a reasonable period of time quantify it by number of units installed by ISPs Should explore tax incentive to further incentivize Suggest that awardees be required to provide a fully funded plan for a minimum of 10 years. Suggest that state should focus on network solutions that can support at least 250/250 megabits within the next 3 years Suggests expanding the definition of eligible geographies for funding, can serve a far greater number of residents who are in critical need Recommend that the single size project threshold be increased from \$5 million to \$10 million</p>
<p>George Buckner (gbuckner@cfec.com)</p>	<p>Central Florida Electric Cooperative, Inc.</p>	<p>1. The FCC considers 25Mbps download and 3Mbps upload as broadband service, so are speeds lower than this considered “unserved”? Is the internet access that wireless carriers provide, which do not meet section 7(a)4’s scalability requirements, considered broadband internet service under section 8(b)? <u>2. There are no penalties for a Challenger that does not fulfil their obligation! Without penalties, it is possible for incumbents to block others from receiving grants and providing service in rural areas.</u> 3. There are no criteria or prioritization for competing technologies – Wireless vs Fiber vs Cable Scoring Matrix: a. The following items should be relocated from Section E (Funding Sources and Community Support to Sections C (Project Viability & Sustainability) i. <u>Match of non-state funds (see table for scoring)</u> ii. <u>Verified Financial Commitment of non-state funds</u> This would also increase this section by 20 points, which would stress the importance of a successful project. b. The rest of Section E should only be Community Support i. Include Evidence of Community Support and Local Technology Planning Team ii. <u>Merge with Section F</u> <u>1. This would increase this newly merged section to 45 points, which would stress the importance of the LTPT and community support / alignment.</u> <u>iii. One of the prior concerns mentioned dealt with the increased role of the LTPT. If this is the case..</u> <u>1. We completely agree that there should be an increased role of the LTPT and applicants should be required to coordinate all grant applications with the LTPT.</u> a. <u>This area takes the most effort and volunteers in order to source the data required for the each grant application.</u> b. <u>The requirement will increase the stress / workload of an already overwhelmed group of volunteers, but will ensure that the applicant fulfils the needs of the rural area that they plan to serve.</u> Grants iv.(d) A single project may not be awarded a grant in excess of \$5 million. How is this being tracked? Why is the challenge process not used for this? a. Create a Funding Bridge for projects without Grants i. Many of our projects will be started and / or completed prior to grant funding being available. iii. An example of a Funding Bridge would be something similar to the USDA Low Interest Loan Program. 2. The State of Florida should setup a “no-interest” loan opportunity for organizations willing to move forward on broadband projects without grant funding. a. Both the State and local communities will make more in broadband related taxes and economic development, than the State would get from managing low-interest loans. This would also increase this section by 20 points, which would stress the importance of a successful project.</p>
<p>Mike Langton (mlangton@langtonconsulting.com)</p>	<p>Langton Consulting</p>	<p>Grant application is too complex, requests too many details and data, too much information in general. Please seek to streamline the information requested in the initial application. Further information can be gathered in the application review and cure process once preliminary scores are determined. Can a single entity apply for more than one grant if there are different service areas involved? Does the language “no Federal dollars awarded to an entity” include the RDOF allocations? What exactly does the language mean, “when combined with any state or local funds”, pertaining to 50% match requirement? Grant application requires information on how applicant will address Goals and Objectives in State Strategic Plan. But State Strategic Plan has no Goals or Objectives, do you mean the 25 Strategies? Must an applicant speak to all 25? Statement that applications must achieve a minimum score of 130 points. Is that a threshold that if you don’t achieve at least 130 out of 300 possible points that the application will be rejected? What about the cure period? When do you anticipate the first round of grant applications being due? What will be the deadline for submission of grant applications?</p>

<p>Ananda Leeke0 (Ananda.Leeke.567129848@p2a.co)</p>	<p>BC4DE</p>	<p>Black churches have worked to expand internet access and provide educational opportunities for adults. Many churches were among the vanguard in establishing computer labs for parishioners and members of the public. Black church leaders are uniquely positioned to help members of their communities get connected to the internet. That’s why the Black Churches 4 Digital Equity (BC4DE) Coalition is working with 25 Black churches and Black church nonprofit organizations across the country to end the digital divide as we now know it. I support the BC4DE Coalition’s view that Black church leaders can use their trusted voices to raise awareness of low-cost internet options, work with the state to build sustainable digital equity plans, and help execute those plans.</p> <p>I also believe that Black Churches and other multi-faith nonprofits should be designated as Community Anchor Institutions (CAIs) at the state level to help Black communities gain the connectivity, tools and skills needed to take full advantage of digital opportunities for advancement.</p> <p>I hope our state’s Digital Equity Plan will recognize the important role Black churches can play to raise awareness of broadband assistance programs, offer digital skills classes, and help members of our community get connected.</p>
<p>Continued</p>		<p>I. REVISIONS TO PROPOSED RULES</p> <p>☑ 73C-50.003(5) Application Requirements and Process: Lumen has inserted language to expressly provide for the submission of confidential information as part of an applicant’s application. This new language mirrors the requirements set forth in 73C-50.005(2) for challenges to applications. It is foreseeable that applicants may provide competitively sensitive or other proprietary information as part of their applications and this rule change will facilitate protection of any such information.</p> <p>☑ 73C-50.004(1) Application Review: Lumen has inserted language stating that the Office shall also publish service maps of the proposed project areas in PDF and electronic format in addition to publishing a list of the proposed unserved areas to be served. A map will provide useful information to incumbent providers and other interested parties in more specific form than a mere list would. Further, this proposed requirement should not be burdensome since applicants must submit maps in PDF and electronic format as part of their application.</p> <p>☑ 73C-50.005(3) Application Challenge Process: Lumen has inserted language to specify that notice of challenges to an applicant’s application will be provided via electronic mail, in addition to being provided in writing. This change will help speed distribution of notice to affected applicants should their application(s) be subject to a challenge, with little additional burden.</p> <p>☑ 73C-50.006(1) Evaluation Criteria: Lumen has inserted language to state that the specific criteria and quantitative scoring system used to evaluate and rank applications to receive funding from the Broadband Opportunity Program will be posted on the Department’s website both prior to and during the noticed application period. Specifying that the criteria and scoring system will be available prior to the application period will help ensure applicants meet the minimum scoring criteria and should improve the quality of applications received by the Department overall.</p>
<p>Continued</p>		<p>73C-50.009(3) Grant Closeout: Lumen has inserted language to extend the time period for submitting documentation after grant termination or expiration from 45 days to 180 days. In Lumen’s experience, there can be delays with reviewing reimbursement requests and it can take several weeks to receive invoices from third parties. In the event there are issues with the invoices, that can be time-consuming to correct. To account for these lead times, Lumen recommends extending the timeframe to provide documentation to 180 days.</p> <p>II. PROPOSED CHANGES TO APPLICATION AND SCORING CRITERIA</p> <p>☑ Including Construction Cost per Home in the Scoring Criteria: While Construction Cost per Home is required to be submitted as part of the Application (see Application Page 8), Lumen does not see this important metric included as part of the Scoring Criteria. This information is necessary and useful to facilitate comparison between competing proposals in the same or similar areas and to ensure efficient spending of limited grant dollars. The Office should consider adding this metric to the Section A – Broadband Impact portion of the Scoring Criteria to reward those applicants that offer a lower Construction Cost per Home solution.</p> <p>☑ Requiring a Professional Engineering Certification after Grant Approval: The Application makes clear that a design certified by a Professional Engineer is required for an Application to be deemed complete (see Application Page 16). The need for a Professional Engineer certification is also reflected in the Scoring Criteria (Section G – Detailed Engineering Design and Network Map). Lumen is concerned that requiring a Professional Engineer certification at the Application stage adds unnecessary time and expense to completing an Application and may unintentionally serve as an entry barrier for some potential applicants.</p> <p>Lumen appreciates the need for accurate engineering designs and planning.</p>
<p>Continued</p>		<p>Lumen’s normal process is to perform detailed planning using engineering software, but not to generate design plans reviewable by a Professional Engineer until later in the grant process. Those types of plans would generally take several additional weeks to complete and the Professional Engineer certification then adds several thousands of dollars in costs. This time and expense is wasted if an applicant is not awarded the grant. Lumen does not dispute the need for detailed engineering plans, but instead proposes that a Professional Engineer certification be required on plans after a grant is awarded and before construction begins. This timing will ensure that plans receive the appropriate certification without injecting unnecessary delay and expense into the grant process for projects that may not ultimately be funded.</p> <p>☑ Training: Lumen notes that the Application includes a section entitled “Programs to Encourage Adoption of Broadband Services” (see Application Page 18). While Lumen appreciates service providers playing a role in this training, education and adoption process, these efforts are likely to be more successful if they are accompanied by State-level outreach programs. A State-level program stands to be more consistent than a variety of programs offered by numerous individual service providers would, enhancing the program’s overall effectiveness.</p>

<p>Keith DeLuca (Keith.Deluca@parsons.com)</p>	<p>Parsons</p>	<p>1.. What oversight will be made to ensure the grant money goes to actually ensuring broadband is provided to those in need and not misused by large telecommunication firms?</p> <p>2. A phased approached method should be required or encouraged to ensure the money is being used as needed. Again, oversight is recommended to be sure companies are not providing faster broadband at a premium to existing communities for service in lieu of communities most in need. Also, experience has shown some organizations will misuse funding if provided as a lump sum.</p> <p>3. It appears the 50% match requirement will not allow a number of the counties and local agencies found within the state to apply for the grant. Will Rural Infrastructure Fund Program (RIF) address this?</p> <p>4. Many rural communities are operating on a shoestring budget. They currently do not have the ability or resources to factor in additional funding in their 3-year or 5-year town/county budget. Are there any specific funding resources available through a grant process that will award funding based on community needs? The feasibility study is a start but this may even be a burden to smaller rural communities. Is there a mechanism to provide funding they don't have to pay back or can pay back over time via leasing out infrastructure to cable providers?</p> <p><u>5. Scalability should be weighted greater than it is.</u></p> <p>6. Proposed saturation rate of unserved, underserved homes/businesses with Broadband should be a high weight factor in obtaining a grant. Opening up grants to private firms also brings in the reality of ROI, whereas public agencies focus is less on ROI and more on quality of life.</p> <p>7. Parsons is interested in building a team to use best business practices and our knowledge of FDOT's existing fiber optic/wireless infrastructure to quickly and effectively deploy middle mile infrastructure in place for wireless last mile connectivity, especially for rural communities and homeowners/business currently off the grid. These past three meetings have provided much insight, industry connections and potential teaming partners needed to help the DEO Office of Broadband achieve its goals.</p>
<p>Karen Dearden (kd6930@att.com)</p>	<p>AT&T</p>	<p>Scoring System vague and has ambiguous terms, changes should be made</p> <p>Requiring detailed network maps could be an issue for providers</p> <p>Detailed line-item budget information, penetration rates and information regarding positive cash flows and cost per fiber mile calculations are problematic</p> <p>Financial forecasts for the next five years will be burdensome to calculate</p> <p>Financial forecasts for the next five years will be burdensome to calculate</p> <p>suggests DEO look to other states that have already developed scoring systems for similar programs that address a number of these issues</p> <p>Challenge Process timeline needs to be refined and condensed, suggests a timeline of 15 days to challenge, 15 days to respond, and 15 days for final determination</p> <p>Challenge process should require information and supplemental materials beyond "detailed and concise statements"</p> <p>Challenge process language should clarify that the Application Review will not start until after the Challenge process is complete</p> <p>Requiring a five-year price commitment from providers will increase costs for providers unnecessarily</p> <p>Requiring a Professional Engineer (PE) to certify the network map is unnecessary and increases costs</p> <p>Requiring open access for the purposes of this program will unnecessarily limit the program to providers that are willing to provide open access since not every provider does, limits the effectiveness</p>

<p>Shannon Roberts (shannonr2@suwcountyfl.gov)</p>	<p>Suwannee County BOCC</p>	<ul style="list-style-type: none"> • Faster Florida Broadband Map misrepresents speed test data with arbitrary groupings • Extraordinarily large range of 25-150Mbps obfuscates results by combining too much data • Leads viewer to erroneous conclusion that everything looks green/good • <u>American Rescue Plant Act (ARPA) establishes one benchmark for broadband investment: reliable 100Mbps that bidirectional (100Mbps up / 100Mbps down) See language in ARPA Law -Title 31 Section 35.6(e)(2)(i)(B)(1)</u> • Emphasize speed test results below bidirectional 100Mbps fail to meet ARPA benchmark- that data shows the real digital divide in RAO counties • RAO counties cannot hope to leverage the Broadband Opportunity grant because they cannot afford the matching funds requirement • Office of Broadband asserts match is required by law but does not mention ARPA law giving the state ability to satisfy this requirement • Florida Broadband Strategic plan specifies on pg. 34 that REDI/State assist RAOs by waiving the financial match requirement • Forcing RAOs to substantiate economic distress is tantamount to the state requiring these poor rural counties to spend monies that they don't have to prove that they don't have money • Rules require RAO county to substantiate its economic distress when it has already been established through the State Legislature is simply onerous. • FS 288.0656 asserts that RAO designated counties exist in chronic economic distress. • RAO counties should receive the highest points by default in that portion of the application. • Non-RAO counties should be required to substantiate economic distress. Current Office of Broadband application has 8 sections that includes 29 objectives, and the maximum award amount is only \$5M & NTIA broadband improvement program application only had 3 sections with 8 objectives, and applicants could request up to \$30M award • Streamline complexity by including necessary deliverables or requirements by embedding them into the scope of work or as a term of the agreement not in the front-end application. Florida statutes contain the essence of what the legislature intended for the Broadband program, but the rules omit vital references to hold the program accountable for compliance to those laws/statutes. • Key Florida statutes such as sections 288.9961, 288.0656 and 288.06561 each contain vital information that directly influence and impact the Office of Broadband and the grant program omitted from reference • Applicant has 8 sections that includes 29 objectives just to meet the requirements of "completeness" • Any challenger can simply assert an unsubstantiated single issue that could potentially jeopardize or delay the applicant's submittal • FS 288.9962 fails to provide a requirement that the challenger specify, in any fashion, that their conflicting service even meets the underlying ARPA benchmark of bidirectional 100Mbps • Amend challenge process to contain requirements for challengers to specifically describe the details regarding the type of service, available or proposed, and how it compares to the ARPA benchmark of speed, reliability, and affordable adoption
<p>David Reed (david@maxantmetals.com)</p>	<p>Local Business Owner</p>	<p>Left the meeting with more questions than answers.</p> <ol style="list-style-type: none"> 1. Who is the Glades County/Moore Haven technology rep? 2. As a business owner what is the cost reward per client? The program is all about the running of cable not actually getting clients. Seems to me a terrestrial solution in rural glades would result in more cost effective results. 3. The overlay for Moore Haven shows green for most of the city, however most of the failures for speed tests are also in this area. The current local cable suppliers need to be held accountable for poor services in areas that are "serviced" 4. As Florida is in the hurricane belt a process of evaluation for "hardness" should be taken into account. Cables running on old power poles is a setup for failures. 5. how much are suppliers suppose to charge clients after the service is run?

<p>Mike Dunne (mike.dunne@fiber-rise.com)</p>	<p>Fiber Rise</p>	<p>List of eligible applicants should be clarified to specifically include both electric membership cooperatives and municipal utilities believe that longtime electric service providers have more than proven their commitment to serving their communities with distinction by delivering complex services reliably and sustainably. Qualified local broadband service providers are invested at several levels in a project’s success and the need to sustain consistent high qualities of service. Various entities can deliver local community broadband including counties and municipalities, electric cooperatives, and telephone cooperatives. Small, local internet service providers (ISP) are also usually committed to serving their communities well. One local provider type that has likely been serving a rural community the longest is the local electric cooperative. Electric cooperatives stepped up when national electric providers would not deliver electricity to rural, unserved areas</p> <p>Advantages do electric cooperatives bring to Florida’s Broadband Opportunity Program:</p> <ol style="list-style-type: none"> a. An electric cooperative serves power to each location in their service area b. Typically, an electric cooperative fiber broadband network follows the power network c. Electric cooperatives are not-for-profit entities and will serve broadband to their communities with the same dedication and commitment to service as they employed when rural electric grids were first built – and at pricing that is not dependent on a profit margin. One of the key components of American Rescue Plan Act and Infrastructure Investment and Jobs Act funding is affordability. As a not-for-profit provider, an electric cooperative is best positioned to offer a high-quality service that is affordable. d. An electric cooperative will generally deploy a fiber optic network, the most sustainable broadband technology currently in use. The usable life of the foundational fiber network is in the realm of 30-40 years. Today, many cooperatives are deploying 10-gigabit passive optical networks, which means not only is the fiber long lasting, but the electronics at either end will be able to keep up with bandwidth demands for years (if not decades) to come. e. Although fiber optic network deployment costs are higher than some other technologies, new research suggests that over the life of the asset, fiber is no more expensive than fixed wireless. This new report, “Fixed Wireless Technologies and Their Suitability for Broadband Delivery” written by Andrew L. Afflerbach, PhD, P.E. (available here for download: https://www.benton.org/publications/FixedWireless), concludes that while fixed wireless technologies will continue to improve, they will not match the performance of fiber networks. Further, total cost of ownership for fiber and fixed wireless networks are comparable over a 30-year network lifespan. f. Electric cooperative fiber optic networks are resilient because most are built using a ring-based architecture. That means even if a fiber is cut, traffic can automatically be rerouted in another direction around the ring, so that subscribers experience little to no outage. Resiliency is another key component highlighted in the guidelines and rules published by Treasury and NTIA. As noted previously, not only do electric cooperatives build resilient fiber broadband networks, but they have decades of experience in quickly restoring critical utilities to service and minimizing customer impact. In a time when Florida is facing increased risk from catastrophic weather events, the combination of fiber network resiliency and electric cooperative expertise will be vital for the state’s broadband users.
<p>Continued</p>		<p>4. Grant Award Process and Maximum Grant Amount: We agree with the State of Florida that structuring grant awards for the Broadband Opportunity Program as reimbursable is the correct decision. There have been many cases in recent years of grant recipients not delivering on their funded obligations. That said, deploying broadband, regardless of the technology, is an expensive proposition if done correctly. We disagree with a maximum award of \$5 million. The state of Tennessee’s recent Tennessee Emergency Broadband Fund program assigned no dollar cap to grant applications (https://www.tn.gov/ecd/rural-development/tennessee-broadband-grant-initiative/tennessee-emergency-broadband-fund.html). Using a comprehensive application and scoring system (as Florida has also developed), Tennessee was able to award available funds based on merit and proposed project outcomes. Tennessee believes – and we agree – that this system ensures providers who are best equipped to bring broadband to the highest number of unserved and underserved locations in the shortest possible time scale are provided commensurate funding to do so.</p>

<p>Shiloh McPherson (smcpherson@fl-counties.com)</p>	<p>Florida Association of Counties</p>	<p>By deferring to the US Treasury guidelines, underserved areas of the state will be eligible, including areas to deliver wireline service up to symmetrical 100 Mbps down & 100 Mbps up. Provisions in the grant application go beyond to ensure scalability of speeds. In doing so, a larger swath of Florida will be eligible for state grants and project investments will be future proofed. The determination of speed thresholds removes barriers of eligibility when the maps do not align with the speeds experienced in communities. Projects must be related to addressing impacts exacerbated by COVID-19 including work, education, and healthcare. FAC supports the interpretation of draft rule 73C-50.001 Authority; Incorporation and 73C-50.002 Definitions Section 4 as it protects the state and local governments from federal claw-back. Section 9/Criteria E of the draft Grant Application/Criteria is dedicated to documenting local coordination. Section 10/Criteria F of the draft Grant Application is dedicated to documenting the alignment with the State Strategic Plan. While the scoring criteria includes these sections, approval of a project does not require an applicant to:</p> <ul style="list-style-type: none"> • Participate in a Local Technology Planning Team • Provide Evidence of Community Support • Align project goals with State Strategic Plan <p>From the explanation of Strategy 21 in the Strategic Plan: “Compliance with this Strategic Plan is a requirement for Grant Applicants.” LTPT involvement, documented local support, and Strategic Plan alignment must be required criteria for grant awardees. Additionally, an increase in awardable points for local engagement would bridge the gap for the current requirements. Without this requirement, applicants could circumvent the work of an LTPT and a community’s stated goals for broadband deployment. Furthermore, the collaboration and mandate of LTPTs is severely weakened if applicants can qualify for grants without documented involvement at the local level. At a minimum, modification of the grant application scoring must reflect the significance of the LTPTs’ and the Office’s multi-year effort. The current 30 point, or 10%, total hinders local efforts and the Office’s monumental work to compile a comprehensive state broadband plan. Without this requirement, a hypothetical application could be funded with:</p> <ul style="list-style-type: none"> • A minimum evaluation score of 130, total 300, for applications to be considered for funding. • Applicant receives a zero/low score for (Section 9/Criteria E) Community support, (Section 10/Criteria F) alignment with the strategic plan • However, it still reaches well beyond the threshold to be a funded project. • Score thresholds could also be reached without other essential criteria: local match/fiscally constrained counties, affordability & adoption, and economic distress <p>While FAC recognizes the importance of private capital in leveraging limited resources to maximize potential project reach, initiating broadband projects without assurances of financial grant commitments will severely deter, if not eliminate county government willingness to apply for generational investments.</p>
<p>Continued</p>		<p>Counties continue the work of the LTPTs through local surveys and feasibility studies. The grant program now asks these financially limited communities to take on an additional up-front cost—through the reimbursement grant. Up-front costs also include producing a detailed grant application requiring additional expertise for compliance. LTPT-designated priorities may go unrealized due to this deterrent. FAC respectfully requests the Office to consider changing “reimbursement language” as it relates to government applicants, including providing for the waiver or reduction of match requirements for rural and fiscally-constrained counties. Setting aside the problems of ISPs challenging potential applicants, there are no financial penalties for challengers if they fail to deliver broadband to the project area. F.S. 288.9962(6)f only limits the consideration of a provider’s challenges in the next two grant cycles, unless the Office determines the provider’s failure to meet its commitment resulted from circumstances beyond its control. This leaves a real possibility of a challenge resulting in a “grant block” effectively shutting a community out of the once-in-a-generation grant cycle. A grant block could result with an application prevented, service promised, and access denied for an unserved or underserved community. In addition, the draft rule should include language specifying, at least, minimum criteria or factors the Office will consider in making a determination that a challenger failed to meet its broadband internet service commitment because of circumstances beyond its control. An additional grant cycle may be necessary to ensure the challenges do not block communities from this grant process. Furthermore, an additional grant cycle may allow LTPTs to develop their local plans in coordination with providers and coordinate local funding with annual budget cycles. An additional grant cycle may be necessary to ensure the challenges do not block communities from this grant process. Furthermore, an additional grant cycle may allow LTPTs to develop their local plans in coordination with providers and coordinate local funding with annual budget cycles. FAC supports the draft rule definition for “the program” as inclusive to unserved, underserved, and rural areas of the state to align state & federal programs. Clarification is needed to assist potential applicants in determining which areas are deemed served. By providing this information prior to the application cycle, potential applicants will not waste scarce resources in grant development and challenge processes. FAC supports the continued state mapping initiative and efforts to best inform the federal FCC 477 map with state data</p>

<p>Charlie Dudley (cdudley@flapartners.com)</p>	<p>FIT</p>	<p>FIT believes this(C. Project Viability & Sustainability) should be among the highest scoring category in terms of points available as its by far the most important to insure that taxpayer dollars are maximized and not wasted. While this is one of the criteria in the statute, this weighting is too high and potentially results in a preference to areas where broadband is deployed/available, but adoption rates are low due to affordability and lack of awareness/utilization of existing economic support programs.</p> <p>There is no statutory authority to give points/preference to "discounting of devices" or service.</p> <p>FIT believes that this (C .2 Organization Capability and Track Record) scoring category should receive more points as the goal of this program is to deploy broadband services as quickly and ubiquitous as possible</p> <p>This (D.1 Economic Distress) category is too highly weighted and has the potential to penalize certain unserved areas where there is not as much economic distress as other areas, including urban areas where broadband readily available</p> <p>This (G.1 Detailed, Reasonable Project Schedule) criteria is perhaps not weighted as highly as it should given its significance to the overall goal of the program. Consider awarding as much as 20 points.</p> <p>Alternative certification should be allowed from such organizations as the Society of Cable Telecommunications Engineers (see www.scte.org for more information on their certification process and testing.</p> <p>This (G .3 Leveraging Existing Resources and Operating Assets) category should also receive more potential maximum points as it demonstrates project commitment and improves short and long term network viability.</p> <p>These "discounts" and the use of the grant program to implement "rate regulation" and other controls on providers is not authorized under the statute. Affordability is a function of adoption efforts and utilization of existing programs for the economically distressed that are requirements under federal law for participants. Further, such requirements run afoul of s. 364.013, F.S. that specifically exempts broadband service from any state regulation.</p> <p>The Rule should differentiate between what is "required" under federal law versus recommendations or guidance. State law should trump any recommendations or guidance as the governing policy for this grant program</p> <p>Will DEO be publishing a "preliminary map" prior to the application process so that the "unserved areas" of the state are known to prospective applicants and other interested parties? The establishment of such a baseline map would help reduce potential challenges and give applicants are more clear roadmap of "unserved" areas as the state law clearly prohibits the award of any funds to an area – or parts of an area – that are already served or broadband is accessible</p>
<p>Continued</p>		<p>FIT suggested edits/language to clarify the rule as provided for by the statute (73C-50.005 Application Challenge Process)</p> <p>How can a Challenger exercise the full statutory challenge rights - particularly under s. 288.9962(6)(c)3. where a challenger needs to know the applicant's proposed "timeline" to determine if they will be deploying broadband in that area outside the grant program but within the same proposed timeline? It seems the "Challenge" process would not begin until 45 days after DEO publishes the list of awarded applications - at least as it applies to c.3. cited above.</p> <p>Challengers (and Applicants) will need to work with DEO to understand public records law and how to submit properly should they wish to protect confidential or proprietary information</p> <p>Application</p> <p>FIT suggested language to include the statutory prohibition on funds being awarded for an area where end users have access to broadband internet access.</p> <p>Suggest replacing "cost per Fiber Mile Deployed" with "Cost per passing service address" as more appropriate. (</p> <p>While the statute does list "serving economically distressed areas" as ONE of several criteria, too much emphasis (or points awarded) for this criteria will disproportionately advantage "urban" or areas that have existing broadband service but may face "adoption" or "affordability" issues rather than "availability".</p> <p>Middle mile projects should be of less priority than projects that result in broadband deployment to premises/businesses, i.e., "end users".</p> <p>This should be modified to also permit design/certification by non-PEs such as an expert and member of an accredited organization such as SCTE. See FIT comments in the Scoring Criteria. (Professional Engineering Certification)</p> <p>Applicants should be allowed to provide SEC filings of parent companies in the alternative</p> <p>There is no statutory authority for such a requirement and this provision unduly interferes with business plans that have proven effective. Affordability/adoption efforts such be evaluated by each applicant as outlined - internal or industry programs; use and promotion of the available and applicable federal programs, etc. This also violates Florida law under s. 364.013, F.S. as an attempt to regulate broadband service. This provision and any award of points should be removed.</p> <p>"Open Access" is not required under Florida law - and as a required or preferred policy should be avoided. This may be part of an applicant's business plan, but the presence or absence has no statutory basis under this program. Further, some providers do not allow 3rd parties access to their networks for multiple reasons, including end user and network security and reliability (many providers of broadband are also Carriers of Last Resort and providers of 911 services). Such a requirement also violates s. 364.013, F.S. discussed previously. This provision and any award of points should be removed.</p>

<p>Beth Keating (bkeating@gunster.com)</p>	<p>Cox Communications</p>	<p>Attachment A Page 1: Suggests adding "at regular intervals" Page 2: Suggests adding "or underserved" and ", the GIS maps of the designated areas" Page 3: Suggests adding "or plans to provide", <u>"include a GIS map of challenged area", "or otherwise show that the project area has been awarded federal funding to deploy broadband infrastructure.", "When a Challenge is granted for only a portion of an application, the Office may award a grant to the unchallenged and unserved portion of an application."</u> Page 4: Suggests <u>changing 45 to 90</u> Attachment B Page 3: Suggests adding "-100/20 Mbps" and replacing Maximum with Minimum Page 4: Suggests adding <u>"Examples of potential uses of proposed broadband availability"</u> Page 5: Suggest adding <u>", which can include audited financial statement of applicant's parent company or an irrevocable letter of credit"</u> Page 6: Suggests adding <u>"when combined with any state or local funds"</u> Page 7: Suggests adding <u>"or use of other available funds" and "coordination between applicant and local entities."</u> Suggests removing <u>"Viable public private partnerships", "public private partnerships" and "established to" (Non-state Match)</u> Suggests adding <u>", if applicable" and "or other similar community-focused analysis or study" (E.1)</u> Page 7/8: Suggests <u>"this last point should not be a criteria applicable to an applicant nor should it be applied to reduce available opportunities for unserved and underserved communities.. Likewise, it is not clear, whether and to what extent any or all communities potentially involved have "local technology planning teams." (E.2)</u> Page 9: Suggests removing <u>"Evidence to support verification of public private partnerships" (E.3)</u> Page 10: Suggests removing <u>"Note: Professional Engineering certification is required"</u> Suggest adding <u>", such as participation in available federal programs, such as E-rate." (H.1)</u> Attachment B (2) Page 6: Suggest adding <u>"and above" (A)</u> Page 17: Suggests adding <u>"or irrevocable"</u> Page 19: Suggests adding <u>"whether, or to what extent if any, you are able to commit" (13.A)</u> Suggests removing <u>"The absence of this commitment will deem your application as "incomplete" (15)</u></p>
<p>Charley Dudley</p>	<p>FIT</p>	<p>Page 1: Suggests <u>"The rule should differentiate between what is "required" under federal law versus recommendations or guidance. State law should trump any recommendations of guidance as the governing policy for this grant program"(73c-50.001)</u></p> <p>Page 2: Suggests "Will DEO be publishing a "preliminary map" prior to the application process so that the "unserved areas" of the state are known to prospective applicants and other interested parties? The establishment of such a baseline map would help reduce potential challenges and give applicants are more clear roadmap of "unserved" areas as the state law clearly prohibits the award of any funds to an area – or parts of an area – that are already served or broadband is accessible "</p> <p>Page 3: <u>Suggests removing "that provides existing service in or adjacent to a proposed project area"</u> Suggest adding <u>"application if: (1) that provides existing service in or adjacent to a proposed project area; (2) has been awarded funding from the Connect America Fund in the project area, or (3) where any other federal funding has been awarded and authorized, including through the Rural Digital Opportunity Fund.. " (FIT suggested edits/language to clarify the rule for by the statute)</u> Comment: <u>How can a Challenger exercise the full statutory challenge rights - particularly under s. 288.9962(6)(c)3. where a challenger needs to know the applicant's proposed "timeline" to determine if they will be deploying broadband in that area outside the grant program but within the same proposed timeline? It seems the "Challenge" process would not begin until 45 days after DEO publishes the list of awarded applications - at least as it applies to c.3. cited above.</u> Comment: Challengers (and Applicants) will need to work with DEO to understand public records law and how to submit properly should they wish to protect confidential or proprietary information Suggests adding: The applicant must ensure that grant funds shall not be used to serve any retail end user that already has access to broadband internet service of speeds of at least 25 Mbps download and 3 Mbps upload . (FIT suggested language to include the statutory prohibition on funds being awarded for an area where end users have access to broadband internet access.)</p>
<p>Valerie Malingowski (vmalingowski@northportfl.gov)</p>	<p>North Port City</p>	<p>Comment: "The City of North Port is excited about this new endeavor and we hope this new program will benefit commercial corridors lacking service, such as Sumter and I-75 and Toledo Blade and I-75 in Sarasota County. In addition, we support program priority for underserved residential areas with school aged children."</p>

<p>David Reed (david@maxantmetals.com)</p>	<p>Maxant Metals</p>	<p>1> Who is the Glades County/Moore Haven technology rep? 2> As a business owner what is the cost reward per client? The program is all about the running of cable not actually getting clients. Seems to me a terrestrial solution in rural glades would result in more cost effective results. 3> The overlay for Moore Haven shows green for most of the city, however most of the failures for speed tests are also in this area. The current local cable suppliers need to be held accountable for poor services in areas that are "serviced" 4> As Florida is in the hurricane belt a process of evaluation for "hardness" should be taken into account. Cables running on old power poles is a setup for failures. 5> how much are suppliers suppose to charge clients after the service is run?</p>
<p>Erikk Ross</p>	<p>Lake County Gov.</p>	<p><u>1. 50% grant is problematic – 50% will have to raised locally or from service provider partners.</u> <u>2. \$5 million max grant per project is problematic. Total project cost would max out at \$10 million. Doesn't seem like it would be enough for larger projects in rural areas such as our county.</u> <u>3. Program is a cost reimbursement program. Funding will be provided after expenses have been incurred. I think this will severely limit the projects the county or other government agencies would be willing to take on.</u> (address in webinar) 4. Any existing provider in your area, or adjacent to the area can challenge your application. 5. Applicant eligibility includes anyone (corporations, LLCs, partnerships, tribes, political subdivisions and tribes.) However, The office may not award, directly or indirectly, grants under this section to a governmental entity or an educational institution or affiliate to provide broadband Internet service to any residential or commercial premises, unless other broadband Internet service providers have not deployed service to an unserved area. What about areas that are being served but the service is either inadequate or perhaps the service provider is refusing to add new customers because their network is saturated. Technically it isn't an unserved area, but it is still an area that could be improved but will be unable to apply for these grants.</p>
<p>Guido Dominguez</p>	<p>IBT Group</p>	<p>Firstly, we begin with the ambiguity in the term "project" with regards to the program. We believe changes should be made to the draft to directly address the question of if applicants can submit multiple applications for different projects in separate areas within the same funding round. Believe the rule ought to be modified to clarify that all the available funding does not have be awarded in one application cycle. To understand why, it is helpful to consider the number of awards that will be granted in a situation where all successful applicants apply for the maximum \$5 million and compare it to other successful rural broadband grant programs. In such a situation, a maximum of 80 projects will be awarded. <u>Moving on to the "Percentage of Anticipated Premises Passed Scoring" table on page 3 of the draft scoring criteria, our first comment is the need to add columns outlining the points available for serving premises that are underserved. Underserved areas (those with current speeds below 100/10 Mbps) are outlined by both the state strategic plan and the draft rule and draft scoring criteria as important to our state broadband efforts and eligible for receiving grant funds, yet under the current scoring, no points would be awarded. On top of this, the scoring criteria needs to reflect the reality that projects will likely include multiple different "Speed Now" categories. As of the current draft, it is unclear how a project that serves 100% of total passings but has different passings in different speeds categories would be scored. We suggest an overall multiplier be applied that is proportional to the percent of passings currently in each speed category. For example, if a proposed project were to serve 100% of passings with 1G/1G, where 25% of the area had 25/3 speeds now and 75% had 10/1 speeds now, they would receive 24.5 points (i.e.. from the 100% of total passings row, take the 25 points of the 10/1 @ 1G/1G category and multiply times 0.75, plus the 23 points of the 25/3 @ 1G/1G category times 0.25). Scoring criteria chart should not use the "Minimum Available Speed After Build" as the criteria for different point categories because it is highly likely to lead to residents being priced out from affording internet service. This is because in order to maximize points, an applicant will likely commit to the highest minimum speed available possible. We recommend instead changing the language to be "maximum speed available after build" such that additional points are still given to projects which are future-proof by offering 1G service, without eliminating the choice available for families to subscribe to cheaper service tiers that both meet their broadband needs and budget. This language is still consistent with the B.O.P's minimum buildout speed of 100/20 Mbps with the capability to scale up to 100/100 Mbps or more. The measuring stick by which an applicant defines an area's speeds should also be clarified by the draft rule. It is our opinion that the more data points an applicant can use to show an area is extremely unserved, unserved, or underserved, the better. With regards to the eligible reimbursement costs, we believe the final rule should address the ability of applicants to use the state grant funds to pay for interest accrued on loans. This is especially salient given the statutory requirements that no project can be awarded under the B.O.P if it is also the recipient of other federal funds, as well as the reimbursement nature of the grant program. Because of these provisions, it is likely that private financing through loans will need to be secured by applicants. Additionally, the 50% match requirement will likely increase the number of applicants that will be financing the entire cost of the project through loans. In these cases, the ability of an applicant to use part of the maximum \$5 million award to pay the interest charged over the term of the entire project would allow for even greater flexibility for applicants, and likely increase both the number of applications, as well as the probability of success for these ventures. This clarification would be best addressed through two definitions that should be implemented concurrently. Finally, moving on to the challenge process, we believe that the current process allows too much power to challengers, while including too few safeguards against bad faith challenges. The first clarification that we believe should be included as to the challenge rule regards what speed definition can a challenger use to claim that they serve an area. Both the statute and draft rule as currently written do not place a minimum speed requirement for a challenger to claim that they serve an area.</u></p>

<p>Jeanna W. Stockman (Jeanne w. stockman@lumen.com)</p>	<p>Lumen</p>	<p>Revisions to Rule 73C-50.003 (5) Application Requirements and Process: Inserted language to expressly provide for the submission of confidential information as part of an applicants application. Rule change will facilitate protection of any proprietary information. Consider adding: <u>Any and all confidential business information or proprietary information must be identified upon submission and a redacted copy of the same material provided to the Office concurrent with when the claim of confidentiality or proprietary protection is asserted.</u> 73C-50.004 (1) Application Review: Inserted language stating that the Office shall also publish service maps of the proposed project areas to be served Consider Adding: The Office shall also publish a service map of the proposed project areas in both PDF version and an electronic version in either .shp, .kmz, or .kml format. 73C-50.005(3) Application Challenge Process: Lumen has inserted language to specify that notice of challenges to an applicant’s application will be provided via electronic mail, in addition to being provided in writing. Consider Adding: <u>and by electronic mail</u> 73C-50.006(1) Evaluation Criteria: Lumen has inserted language to state that the specific criteria and quantitative scoring system used to evaluate and rank applications to receive funding from the BOP will be posted on the Department’s website both prior to and during the noticed application period. 73C-50.009(3) Grant Closeout: Lumen has inserted language to extend the time period for submitting documentation after grant termination or expiration from 45 days to 180 days. Including Construction Cost per Home in the Scoring Criteria: While Construction Cost per Home is required to be submitted as part of the Application (see Application Page 8), Lumen does not see this important metric included as part of the Scoring Criteria. Office should consider adding this metric to the Section A – Broadband Impact portion of the Scoring Criteria Requiring a Professional Engineering Certification after Grant Approval: Lumen is concerned that requiring a Professional Engineer certification at the Application stage adds unnecessary time and expense to completing an Application and may unintentionally serve as an entry barrier for some potential applicants. Lumen appreciates the need for accurate engineering designs and planning. Training: Lumen notes that the Application includes a section entitled “Programs to Encourage Adoption of Broadband Services” (see Application Page 18). While Lumen appreciates service providers playing a role in this training, education and adoption process, these efforts are likely to be more successful if they are accompanied by State-level outreach programs. Application: Page 3: Add <u>200 words</u>; Page 4: Future minimum available speed after build (mbps), 1G/1G, & <u>1G/1G</u>; Page 8: <u>Suggest replacing "cost per Fiber Mile Deployed" with "cost per passing service address" as more appropriate</u>; Page 9: Fiber and IRU Fiber-Strand Mile.</p>
<p>Continued</p>		<p>Page 11: Statute does list "serving economically distressed areas" as ONE of several criteria,, too much emphasis (or points awarded) for this criteria will disproportionately advantage "urban" or areas that have existing broadband service but may face "adoption" or "affordability" issues rather than "availability" Page 15: comments about fiber only Middle mile projects should be of less priority than projects that result in broadband deployment to premises/businesses. i.e., "end users" Page 16: This should be modified to also permit design/certification by non-PE's such as an expert and member of an accredited organization such as SCTE. See FIIT comments ain the scoring criteria. Page 17: Applicants should be allowed to provide SEC filings of parents companies in the alternative Pag 19: There is no statutory authority for such a requirement and this provision unduly interferes with business plans that have proven effective. Affordability/adoption efforts such be evaluated by each applicant as outlined - internal or industry programs; use and promotion of the available and applicable federal programs, etc. This also violates Florida law under s.364.013, F.S. as an attempt to regulate broadband service. The provision and any award of points should be removed. "Open Access" is not required under Florida law - and as a required or preferred policy should be avoided. This may be part of an applicant's business plan, but the presence or absence has no statutory basis under this program. Further, some providers do not allow 3rd parties access to their networks for multiple reasons, including end user and network security and reliability (many providers of broadband are also Carriers of Last Resort and providers of 911 services). Such a requirement also violates s. 364.013, F.S. discussed previously. This provision and any award of points should be removed.</p>

Continued		<p>Page 1: (C. Project Viability & Sustainability) FIT believes this should be among the highest scoring category in terms of points available as its by far the most important to insure that taxpayer dollars are maximized and not wasted <u>While this is one of the criteria in the statute, this weighting is too high and potentially results in a preference to areas where broadband is deployed/available, but adoption rates are low due to affordability and lack of awareness/utilization of existing economic support programs</u></p> <p>Page 2: (Discounted devices) <u>There is no statutory authority to give points/preference to "discounting of devices" or service.</u></p> <p>Page 6: (C.2 Organization Capability and Track Record) <u>FIT believes that this scoring category should receive more points as the goal of this program is to deploy broadband services as quickly and ubiquitous as possible</u></p> <p>(D.1 Economic Distress) <u>This category is too highly weighted and has the potential to penalize certain unserved areas where there is not as much economic distress as other areas, including urban areas where broadband readily available</u></p> <p>Page 8: (G.1 Detailed, Reasonable Project Schedule) <u>This criteria is perhaps not weighted as highly as it should given its significance to the overall goal of the program. Consider awarding as much as 20 points.</u></p> <p>Page 9: <u>Alternative certification should be allowed from such organizations as the Society of Cable Telecommunications Engineers (see www.scte.org for more information on their certification process and testing.</u> <u>This category should also receive more potential maximum points as it demonstrates project commitment and improves short and long term network viability.</u> <u>These "discounts" and the use of the grant program to implement "rate regulation" and other controls on providers is not authorized under the statute. Affordability is a function of adoption efforts and utilization of existing programs for the economically distressed that are requirements under federal law for participants. Further, such requirements run afoul of s. 364.013, F.S. that specifically exempts broadband service from any state regulation.</u></p>
<p>Joe York (jy0365@att.com)</p>	AT&T	<p>Scoring System: Changes should be made to ensure the scoring adequately rewards points based on specific discrete qualitative metrics that ensure funds are targeting effective, scalable and sustainable broadband deployment in areas that most need broadband investment. There are inconsistencies in the weighting of categories for scoring, such as the economic impact and the sustainability of the broadband provider. <u>A preference in scoring should prioritize fiber since it delivers the fastest, symmetrical download and upload speeds and most cost-effective long-term broadband solution that will ensure the long-lasting impacts of the awarded projects.</u></p> <p>Requiring detailed network maps could be an issue for providers to comply with. This information is difficult to provide since providers do not typically go to the design phase of a project until a contract award is awarded.</p> <ul style="list-style-type: none"> • Detailed line-item budget information, penetration rates and information regarding positive cash flows and cost per fiber mile calculations are problematic for those same reasons. • <u>Providing financial forecasts for the next five years will be burdensome to calculate and comply with and are at best, highly speculative in a highly dynamic marketplace.</u> • <u>Eligible areas should include unserved as well as underserved locations which is consistent with Treasury's State and Local Fiscal Recovery Funds guidelines.</u> • <u>The Grant Award has language that says that "all grant funds awarded must be fully obligated by December 31, 2024 and expended by December 31, 2026." This is Treasury language that applies to the state, not to the applicant that is awarded funds. The language is repeated in the scoring criteria and should be removed. Treasury has stated that states must "obligate" or "award" funds by 2024. Florida should be trying to award/obligate its SLFRF funds expeditiously to allow applicants until the end of 2026 to build the broadband network.</u> <p>Suggest: DEO look at other state scoring systems.</p> <p>Challenge Process: Timeline needs to refined and condensed. <u>AT&T suggests a timeline of 15 days to challenge, 15 days to respond, and 15 days for final determination. If the factors for challenging are clear and fair, then challenges and a final determination should be straight forward and should not take long to adjudicate. The Challenge process should require information and supplemental materials beyond "detailed and concise statements" (detailed plans, application for construction permits, etc.) that evidence the intention of a challenger to deploy in an area if that is the basis of a challenge. For comparison, the USDA ReConnect program will not grant a challenge unless there is actual physical proof that network is deployed and customers are being served or that construction, e.g. trenching, is underway. Finally, the Challenge process language should clarify that the Application Review will not start until after the Challenge process is complete.</u></p> <p>Five year service plan and price commitment: Requiring five year price commitment from providers will increase costs for providers unnecessarily.</p>
Continued		<p>Professional Engineer Seal Requirement: Requiring a Professional Engineer (PE) to certify the network map is unnecessary and increases costs due to the limited number of PEs and the cost of hiring one to prepare and certify a network map. Telecommunications providers already have an exemption from this requirement in Section 471.003(2)(d), Florida Statutes, for our normal deployment activities. This requirement should allow for alternative certification and be brought in line and with that exemption.</p> <p><u>MISSOURI BROADBAND INFRASTRUCTURE GRANT PROGRAM</u></p>

<p>Kate Blackwelder (Kate.blackwelder@conexon.us)</p>	<p>Conexon</p>	<p>Program should address: 1. What level of internet access will exist in urban areas in a decade’s time? 2. What will be reasonably comparable to that service? Preparation Matters: 1. Identify unserved, underserved, and partially served census blocks in the state. Challenges by incumbent ISPs to the broadband maps should require evidence, not mere assertion. • Use either FCC maps prepared pursuant to the DATA Act, or NTIA maps, state maps, regional maps, or county maps. • According to the most recent FCC data, nearly 150,000 locations are unserved (lacking access to 25/3 Mbps), and another 200,000 locations are underserved (lacking access to 100/20 Mbps). Most of the unserved census blocks were included in the Rural Digital Opportunity Fund program. • The state should publish maps of eligible areas. Applicants for funding should be able to depend on the state’s maps. • In other words, challenges to the state’s identification of eligible areas should require sufficient evidence to overcome a presumption that the areas are unserved or underserved. • Why it matters: Any ISP wishing to challenge state or county eligibility maps should be required to make its FCC broadband data collection filing public with respect to any challenged areas. 2. Allocate funding by census block according to the Infrastructure Act (BEAD) formula or the projected cost to construct fiber networks. 3. Set the required service for applicants at the level of service reasonably comparable to service in urban areas in the state. 4. Accept applications from companies that can demonstrate the capacity to build and operate networks in the eligible census blocks. • Awards should automatically be made to any network that: 1) Can provide symmetrical multi-Gigabit speeds 2) Will be owned by the community served 3) Can be built within a year 4) Can be built for the allocated funds. • The overriding determination should focus on who is best suited to construct, operate, and maintain a network in the coming decades. • Prioritize funding to applicants where the network will be owned by the community served by the network. 5. Vet applicants using objective criteria, including demonstrated capability to construct and operate the size and type of network and level of service proposed in the application. 6. Approve applications for only a single year’s construction. 7. For census blocks covered by multiple applications, require funds be awarded to a community-owned network. 8. Reimburse projects upon completion and demonstration that every location has access to the requisite level of service. 9. In nine months, conduct the next round of funding applications. 10. After two rounds of funding, for any census block that has not received any applications, allow applicants to propose an amount of funding greater than the allocated amount. For census blocks with duplicative applications, award to the low-cost applicant.</p>
<p>Derek Cooper (Derek_Cooper@comcast.com)</p>	<p>Comcast</p>	<p>Page 2: The Program Must Adhere to Florida’s State Law Requirements in Fla. Stat.§§ 288.9961- 288.9962 Page 4: <u>In particular, Treasury does not require a five-year price freeze to comply with affordability requirements, does not require consideration of open access policies, and does not require a preference for end-to-end fiber technology. The Draft Application includes a five-year “service commitment,” which requires that an applicant “confirm [its] commitment to offer these service packages at the stated price points for [sic] next five years. The absence of this commitment will deem [this] application as ‘incomplete.’”</u>7 This requirement effectively sets a five-year price cap on offered broadband services. In doing so, the State is attempting to regulate broadband rates in a way that goes well beyond anything Treasury requires or even encourages. In fact, such attempt to regulate broadband offerings violates longstanding Florida law. Page 8: <u>1) Delete altogether Section 15.D (titled “Open Access Plan” and discussing “Open Access Policies and Programs”) of the Draft Application; (2) Rename the title of Section 15 of the Draft Application from “Open, Access, Shared Use & Business Strategy” to “Service Packaging and Customer Acquisition”; and (3) Eliminate consideration of and delete the line for “Open Access, Wholesale Offerings” from Section C of the Draft Scoring and Evaluation Criteria. (1) In Section 73C-50.005(4) the Draft Rule, DEO should add the following at the end of the subsection: “Pursuant to Section 288.9962(8)(b), F.S., the applicant must ensure that grant funds shall not be used to serve any retail end user that already has access to broadband Internet service, as defined in Section 288.9961(2)(a), F.S.” (2) In Section 73C-50.007 the Draft Rule, DEO should add the following as new subsection (3): “Pursuant to Section 288.9962(8)(b), F.S., grant awards may not be used to serve any retail end user that already has access to broadband Internet service, as defined in Section 288.9961(2)(a), F.S.” (3) In the Draft Application, DEO should reiterate that Program funds are only eligible for service to areas that lack 25/3 Mbps service in the instructions in Sections 3.</u> Page 9: <u>Accordingly, to remain technology neutral, DEO should replace “fiber” with “wireline” as indicated in the appended Draft Redlines.</u> Page 10: <u>Non-State Matching Funds (Section E.1). DEO should also increase the point value for non-state matching funds. As required by Florida statute, providers must supply at least a 50 percent match of project funds; however, the current scale does not adequately incentivize greater proportions (including those above 70 percent) of nonstate matching funds, which are critical to ensure that DEO can extend Program funds to as many unserved Floridians as possible and that selected providers are committed to completing the project. Accordingly, DEO should increase the maximum available points for non-state match to 30 points, which would be available to a new tier of providers that supply matching funds equal to or above 80 percent. • Project Readiness (Section G). Likewise, DEO should increase the scoring value of project readiness from 30 points to at least 40 points, given the goal of connecting as many Floridians as possible to high-quality networks and the tight timeline under SLFRF and CPF rules for expenditure of funds. In particular, DEO should allocate these additional points by increasing Section G.1 (“Detailed, Reasonable Project Schedule”) from 12 to 18 points to reward providers’ commitment to deploy networks in less than two years and increasing Section G.3 (“Leveraging Existing Resources and Operating Assets”) from 9 to 13 points to recognize applicants that can leverage substantial network and non-network investments made in the State of Florida. Page 11: “Business case study to demonstrate financial solvency of proposed project for continued delivery of affordable services” (Replace) with “Other affordability initiatives.”</u></p>

Continued		<p>Page 12: <u>“Special programs and partnerships that provide significant discounts to economically disadvantaged customers, including discounted devices.”</u>. Page 13: Consider first bullet point.</p> <p>Draft Rules</p> <p>Page 3: Pursuant to Section 288.9962(8)(b), F.S., the applicant must ensure that grant funds shall not be used to serve any retail end user that already has access to broadband Internet service, as defined in Section 288.9961(2)(a), F.S.</p> <p>Draft Application</p> <p>Page 1: Applicants may designate portions of their application and any supporting documentation as “Proprietary Confidential Business Information,” and any such designated information will not be publicly disclosed. Page 4: Note that grant funding may only be awarded to areas that lack at least 25/3 Mbps broadband service. As a reminder, applicants may designate this portion of their application and any supporting documentation as “Proprietary Confidential Business Information,” and any such designated information will not be publicly disclosed. Page 5: Replace Fiber with Wireline Page 6: “within the proposed project area” Page 7: As a reminder, applicants may designate this portion of their application and any supporting documentation as “Proprietary Confidential Business Information,” and any such designated information will not be publicly disclosed. Page 9: Replace Fiber with Wireline Page 17: that have not previously deployed broadband infrastructure to at least 1 million customers over the last 5 years MUST PROVIDE a certification from a Professional Engineer. All other applicants may provide a certification from an expert and member of an accredited organization, such as the Society of Cable Telecommunications Engineers (SCTE), who designs network deployments and oversees the implementation of those designs in the regular course of business. Page 19: Other Financial Statements: Please provide five years of audited financial statements or other public financial reports (e.g., SEC filings). An applicant may submit financial statements or public financial reports for its parent company. Page 21: Consider all suggestions.</p> <p>Draft Scoring Page 8: Consider all suggestions Page 9: (H.2) Consider suggestions</p>
<p>Tara Watson (tara@polkvision.com)</p>	Polk County LTPT	<ol style="list-style-type: none"> 1. What is the definition of a Project? <ol style="list-style-type: none"> a. Is it a specific location as an example would the City of Lakeland be considered a separate project from the County? b. What about city to city? 2. What speed test are we going to use for the official definition of Un/Underserved? May we use our own? IE Ookla, M-Labs, etc. 3. What time frame will be used to determine speed? 4. Is it strictly download speed being used? What about uploads? Can an aggregate be used? 5. Are RDOF locations eligible to be included? 6. In the scoring area, the LTPT inclusion seems to be too low. 7. The application is assuming that the applicant already has the technical details for the project. For non-providers, this would need to be supplied once RFPs have been received and awarded, which could not be done until after the funding. Rough order of magnitude \$s could be provided but not the specific details asked for in the application. This may keep local governments from being able to apply.
<p>Meloney Koontz (mkoontz@seminolecountyfl.gov)</p>	Seminole County	<ol style="list-style-type: none"> 1. 50% grant is problematic – 50% will have to be raised locally or from service provider partners and this may be difficult. 2. \$5 million max grant per project is problematic. The total project cost would max out at \$10 million. 3. The program is a cost-reimbursement program. funding will be provided after expenses have been incurred. 4. Any existing provider in your area, or adjacent to the area can challenge your application. 5. Applicant eligible includes anyone (corporations, LLCs, partnerships, tribes, political subdivisions, and tribes.) However, The office may not award, directly or indirectly, grants under this section to a governmental entity or an educational institution or affiliate to provide broadband Internet service to any residential or commercial premises, unless other broadband Internet service providers have not deployed service to an unserved area.
<p>Rachel Cone (cone@thesouthernngroup.com)</p>	Windstream	<ul style="list-style-type: none"> • The draft mentions both unserved and underserved areas, but does not define them. We assume based upon federal and state programs we have worked with that unserved areas will be defined as areas that do not have access to broadband service at 25/3 and underserved areas will be defined as areas that do not have access to broadband service at 100/20, but that should be clearly defined in the program rules. Additionally, will the areas be outlined using the FCC’s form 477 data, a state broadband map, or can applicants use their own mapping data? • Rural areas are mentioned in the program—will only the unserved and underserved areas within rural areas be eligible for program funding, or will applications that serve the unserved and underserved areas within the rural areas be given more points or a points multiplier? • The proposed match of 50% is too low—this will only leave out the ultra-rural and difficult to serve areas of Florida. The best solution would be to let providers set their own matches in their applications and score the applications against each other. If this is not acceptable, a 75% match would be better than what is proposed. • While a great proposal, the challenge process is rather open-ended and may invite some frivolous challenges that will be time consuming for the Department to process. We would propose that any challenges be required to show evidence of speeds via qualifications of individual locations. • How will providers be qualified to participate in the program? Will applicants be required to provide any financial information, evidence of demonstrated success, or other information to prove their ability to succeed with grant funds?