

Idaho Broadband Advisory Board

Idaho Broadband Fund Grant Application Comments

Open January 4-6, 2023

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-----Original Message-----

From: Anne Wilder <anne.wildthing@outlook.com>

Sent: Thursday, January 5, 2023 4:40 PM

To: COM Broadband <broadband@commerce.idaho.gov>

Subject: Broadband Fund Grant Applications

Dear Mr. Hobdey-Sanchez:

I reviewed some of the broadband grant proposals for the northern part of Idaho, when I live, and I notice that Ziply states its proposal is to provide Fiber Optics to the Premises, as opposed to wireless broadband.

I would like to encourage you to consider this grant request with the highest priority. Ziply has been serving N. Idaho well for several years now. Residents of Priest River have received DSL (wired) to their homes for \$20 additional on their phone bill, and are happy. We would like to see the Department of Commerce lean towards wired broadband as it is faster, safer, more reliable, and has about a 5x longer life-span per facility than wireless structures.

I also support Mi Fiber, again, which promises Wired Internet as requested by 170 residents in a petition, 100% fiber optics to the premises.

However, I note that Intermax has also submitted a proposal for Bonner County, to provide fixed wireless broadband to Selle Valley. I am a member of a group of Selle Valley residents, "Save Selle Valley" who formed in order to fight against any kind of wireless broadband in their neighborhoods. In fact, when the Bonner County Planning Department solicited Bonner County residents to update the Bonner County Comprehensive Plan in 2019, the residents of Selle Valley specifically stated they wanted no wireless telecommunication facilities any closer to their homes and schools than 5 miles away. I hope you will take this into consideration as you review the grant requests regarding Bonner County and Selle Valley.

Thank you.

--

Anne Wilder Chamberlain

349 Primrose Lane

Priest River, Idaho 83856

anne.wildthing@outlook.com

208-448-2601



January 5, 2023

Idaho Broadband Advisory Board
c/o Ramón S. Hobdey-Sánchez, J.D.
State Broadband Program Manager
Idaho Department of Commerce
700 W. State Street
Boise, Idaho 83702

Re: Owyhee County Middle Mile and Last Mile Broadband Infrastructure Proposal
submitted by White Cloud Communications

Dear Idaho Broadband Advisory Board:

This letter is to affirm support for the Owyhee County Middle Mile and Last Mile Broadband Infrastructure Proposal submitted by White Cloud Communications. Imagine Idaho Foundation has been working with Owyhee County and its community broadband stakeholders since the fall of 2021 to support them with planning services in preparation for applying for federal and state broadband funding. White Cloud Communications has been a long-standing interested party in the planning process with the County and its stakeholders since that time, which has culminated in the proposal submitted to the IBAB on January 2, 2023.

White Cloud is proposing to build approximately 8 miles of middle-mile fiber as part of its proposed broadband infrastructure project. The middle-mile fiber will connect an existing fiber network from Given's Hot Springs to the County seat of Murphy, building accessible fiber to rural residents along Highway 78 in northern Owyhee County. From this fiber, White Cloud plans a fixed wireless network to deploy wireless broadband internet service to 1,865 unserved and underserved households at speeds greater than 25/3 Mbps, and 1,838 of the households at a speed greater than 100/20 Mbps.

White Cloud is well positioned to begin the deployment of its the proposed broadband infrastructure shortly after the award of the grant, and to complete the project within 2023. Owyhee County has passed a resolution of support for this project. Additional local stakeholders have been engaged for support so that as many unserved and underserved residents have access to service and are ready to subscribe to affordable, reliable internet when the project is complete.

Imagine Idaho Foundation is a 501(c)(3) non-profit created to connect rural Idaho with broadband infrastructure leading to Idahoans securing accessible, reliable, and affordable internet access, that is future-proof and high-speed to further economic prosperity. Incorporated in Idaho Falls, Idaho, we are a non-biased, grant funded, private entity that serves as an educational and capacity building resource for Idaho and its unserved and underserved communities.

Thank you for your consideration.

Sincerely,

A handwritten signature in blue ink, appearing to read "Christina Culver", is written over a light blue rectangular background.

Christina Culver
Director



January 6, 2023

VIA email: broadband@commerce.idaho.gov

Idaho Department of Commerce
Attn: Ramón S. Hobdey-Sánchez, J.D.
State Broadband Program Manager
700 W. State St.
Boise, Idaho 83702

Re: Idaho Broadband Fund Grant Program ("IBF")
Challenge Comments of Columbine Telephone Company, Inc.

Applicant: Teton County, Idaho

To Whom It May Concern:

Columbine Telephone Company, Inc. dba Silver Star Communications ("Silver Star") hereby submits its comments with respect to the above Applicant's proposal submitted to the Idaho Broadband Advisory Board in response to its October 2022 Request for Proposals.

Silver Star has carefully reviewed Applicant's proposal and though it appears the Applicant is asking for planning funds, there is no dollar amount requested and it is not entirely clear whether or not it is only planning funds the Applicant requests. Silver Star wishes to address several statements included in Applicant's proposal in an effort to provide the Board with a full picture as it contemplates the IBF disbursements.

Silver Star has served the Teton Valley, Idaho community for over 25 years; along with its affiliates, it has over 65 years' experience constructing, managing and operating a sophisticated and wide-spread broadband network. Silver Star agrees with the Applicant's assessment that robust and reliable broadband can be a roadblock to a community's economic growth and success. However, Silver Star disagrees that Teton County as a whole lacks access to "affordable, reliable and fast internet." As the premier provider of broadband services in the area described in Applicant's proposal, Silver Star strives to provide exactly that – affordable, reliable and fast internet. Silver Star constantly reviews its rates and conducts market analysis to ensure its rates are market competitive and has certain regulatory obligations to meet that its rates are within certain guidelines. Silver Star's rates have consistently been at the lower end of the spectrum; in fact, Silver Star's retail rate for 100/20 unlimited broadband service is significantly lower than the most recently published FCC Urban Rate Survey.

Silver Star's policy is to interconnect with requesting providers at rates that are market-competitive, although dictated by its existing tariff regulations. Competitive service is possible, however is hindered by the reduced return on investment prevalent in rural areas. Silver Star strives to work

Idaho Department of Commerce
Attn: Ramón S. Hobdey-Sánchez, J.D.
State Broadband Program Manager
January 6, 2023
Page 2

collaboratively with other providers; further, Silver Star is constantly working to improve its service and to extend connections to rural, remote customers and also does have a fixed wireless offering which is employed to serve those customers for which fiber (or copper) facilities have not yet been built. Silver Star is apprehensive about the concept of using State funds to overbuild an existing middle mile network and asks that the Board take a fiduciary approach that ensures State funding resources are employed to make the most impact to end users within the community, as well as to consider any precedent or harm to an existing provider that may result.

Silver Star does not oppose the distribution of planning funds to the Applicant, as it wholeheartedly supports the idea that communities should engage in economic development planning, of which broadband access has become a necessity rather than a nicety. Further, by including in that planning process existing broadband service providers, the process will be more robust and comprehensive, resulting in a plan that is executable and developed to serve the community residents far into the future.

Thank you for the opportunity to respond and provide comments to the Board. We trust the Board will take into consideration these concerns in its review of the submitted proposals. Questions about these comments may be directed to my attention.

Regards,



Paul Petersen
Chief Operating Officer
208-354-6788

From: Marcus Bott <marcusb@rallynet.us>
Sent: Thursday, January 5, 2023 3:35 PM
To: COM Broadband <broadband@commerce.idaho.gov>
Subject: Rally Networks Comments

I would like to submit a comment to add clarity to the Rally Network grant application. I wanted it to be clear that the effective match of our grant is 80%. From our submitted budget sheet this is probably not clear as the budget just outlined the grant funding request. We have invested over \$8M into building our fiber network, and our request is for funding to assist with lighting this network.

I would also like to comment that our grant application has a large overlap with Syringa Networks, our fiber is already in place for the majority of our network, and we would be happy to work with Syringa networks to leverage our network to help them extend their network.

Thank you for your consideration of these comments.

Marcus Bott
Vice President of Operations
1 Telephone Dr
Mt Vernon, OR 97865
P. 541.932.7413



Rally Networks *formerly known as OTC Connections, SGO - Broadband, MissouriCom, and ARK-O Broadband*

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North-Central Idaho- District 2 Interoperability Governance Board

Idaho Broadband Advisory Board
c/o Ramón S. Hobdey-Sánchez, J.D.
State Broadband Program Manager
Idaho Department of Commerce
700 W. State Street
Boise, Idaho 83702

January 5, 2023

re: Letter of Support- Port of Lewiston Middle Mile Network

Dear Idaho Broadband Advisory Board:

This letter supports the Port of Lewiston proposal to establish an open access, middle mile broadband architecture that will connect Moscow to Lewiston and Lewiston to Grangeville. The initiative underscores Idaho’s 2027 broadband strategic goal of providing 100% of Idaho with accessible, reliable, and affordable high-speed internet. This middle mile network will prepare North Central Idaho (District II) communities for last mile infrastructure and set Idaho up to successfully compete for BEAD funding. The proposed network will link into the IRON/IIG open-access middle mile in Grangeville and help to finally provide infrastructure that will connect north and south Idaho, within the state of Idaho.

Further, an engineering study has also been completed to construct a redundant broadband path that will connect Grangeville and Orofino, Idaho (DIGB2 Middle Mile Segment). This assessment has recommended the construction path and identified the required capital necessary to establish this complimentary fiber path and link it into the Port of Lewiston and IRON/IIG projects.

The District 2 Interoperability Governance Board’s membership of public safety officials, tribal and elected public officials from the five north-central Idaho Counties and Nez Perce Tribe have long sought to establish these vital links. The Port of Lewiston open access proposal will achieve this goal.

In addition to providing direct economic, education, governmental and healthcare benefits, the Port of Lewiston project proposal will also provide the bandwidth, speeds and available middle mile network redundancy that will finally enable PSAP 9-1-1 call taking and public safety emergency response functions to be transferred from one dispatch center to another across the five counties from Moscow to Grangeville in the event of a local service loss or disaster emergency. The Port of Lewiston proposal in coordination with the IRON/IIG proposal is the most robust, the strongest resourced, best-defined effort to build this middle mile segment to support last mile public and private connectivity DIGB2 has encountered. We unequivocally endorse this proposal and commend it to the Idaho Broadband Advisory Board for funding.

Sincerely,
Jerry Zumalt
District 2 DIGB Chair



January 4, 2023

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State of Idaho

University of Idaho

Washington State University

Ramón S. Hobdey-Sánchez, J.D.
State Broadband Program Manager
Idaho Department of Commerce
700 W. State St., Boise, Idaho 83702
Email: broadband@commerce.idaho.gov

Dear Idaho Broadband Advisory Board:

Please accept our letter of support for the Port of Lewiston project to build 95 miles of fiber optic infrastructure between Moscow to Lewiston and Lewiston to Grangeville, Idaho. This project is collaborative in nature and is critical to support the completion of a north/south open access middle mile route.

Collaboration is demonstrated financially, regionally and statewide:

- Financial collaboration -- The Port solely pursued and was awarded a Federal EDA grant for a portion of this project to meet the needs of North Central Idaho's five county area. The Port's EDA application also committed 100% of the matched dollars required (~\$1.2M) for the project.
- Regional collaboration -- The Port of Lewiston's project garnered 37 Letters of Support from many of the region's businesses, schools, local ISPs, the Governor's office, and State of Idaho legislative and congressional representatives.
- Statewide collaboration -- This project is one piece of a larger, statewide effort to connect northern and southern Idaho with open access, fiber optic infrastructure. They are now asking the state to also support the collaborative efforts by funding the balance needed to implement the project.

We fully support this project that will benefit both the public and private sectors within Idaho and provide reliable and redundant high-speed connectivity.

Sincerely,
Brent Stacey



President and CEO

Idaho Broadband Advisory Board
 c/o Ramón S. Hobdey-Sánchez, J.D.
 State Broadband Program Manager
 Idaho Department of Commerce
 700 W. State St., Boise, ID 83702

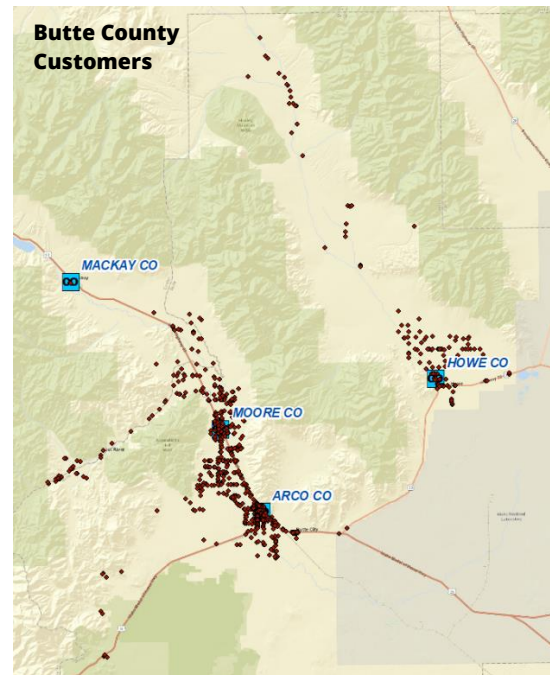
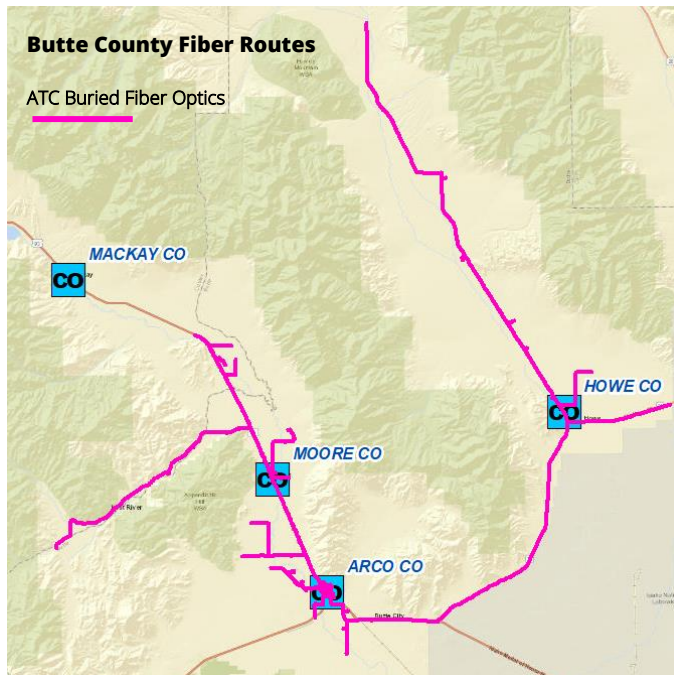
Re: Mud Lake Grant Proposal – Butte County Planning Proposal and Butte County Broadband Project Proposal

As a telecommunications provider for over 90 years, ATC Communications shares the same strategic goal that the State of Idaho has outlined – to deploy fiber to all of Idaho. To reach that goal, ATC believes that any investment made in areas that already have fiber infrastructure would be an inadequate use of funds and should instead go toward communities that lack fiber optics. After reviewing the applications, ATC believes the following project should not be considered for funding:

Project Name/Description: Butte County Planning Proposal & Butte County Broadband Project Proposal
Submitted By: Mud Lake Telephone
RFI Page #: 275-277 & 278-280

Summary: ATC has built over 200 miles of fiber in Butte County (see map below) over the last 25 years. Nearly 70% of the City of Arco is connected to fiber with speeds of 1Gbps/1Gbps and 39% of the entire County has fiber. The statement from the applicant that "the entirety of Butte County is believed to be unserved or underserved" is false.

Details: ATC Communications has been providing fiber optic Internet service in Butte County for over 25 years. We currently serve the entire County using a combination of fiber, copper, and wireless. Today, the vast majority of the middle mile infrastructure is in place and over the last few years ATC started bringing fiber to homes and businesses. We currently have fiber to 39% of Butte County and have aggressive plans to reach the remaining customers. This is well above the state-wide average of 28%.



ATC currently serves 1,081 customers in Butte County and employs 6 local support staff to serve the community. Over the last 25 years, ATC has invested \$11M in CapEx in Butte County with \$3.7M of that going to fiber expansion. ATC has aggressive plans to continue connecting homes and businesses with fiber and will not stop until every location is served with fiber.

Given the strength of our existing network and our plan to extend fiber to every single home in Butte County, we believe Mud Lake's proposed project and planning grant should not be funded. State grant dollars should go towards unserved locations instead of a project that provides duplicative fiber service.

Note: All of ATC's deployment data has been provided to the FCC and is part of the new National Broadband Map (see broadbandmap.fcc.gov).

Thank you for your consideration,

A handwritten signature in black ink, appearing to read "K. Bradshaw", is positioned above the typed name.

Kyle Bradshaw
General Manager



January 6, 2023

VIA email: broadband@commerce.idaho.gov

Idaho Department of Commerce
Attn: Ramón S. Hobdey-Sánchez, J.D.
State Broadband Program Manager
700 W. State St.
Boise, Idaho 83702

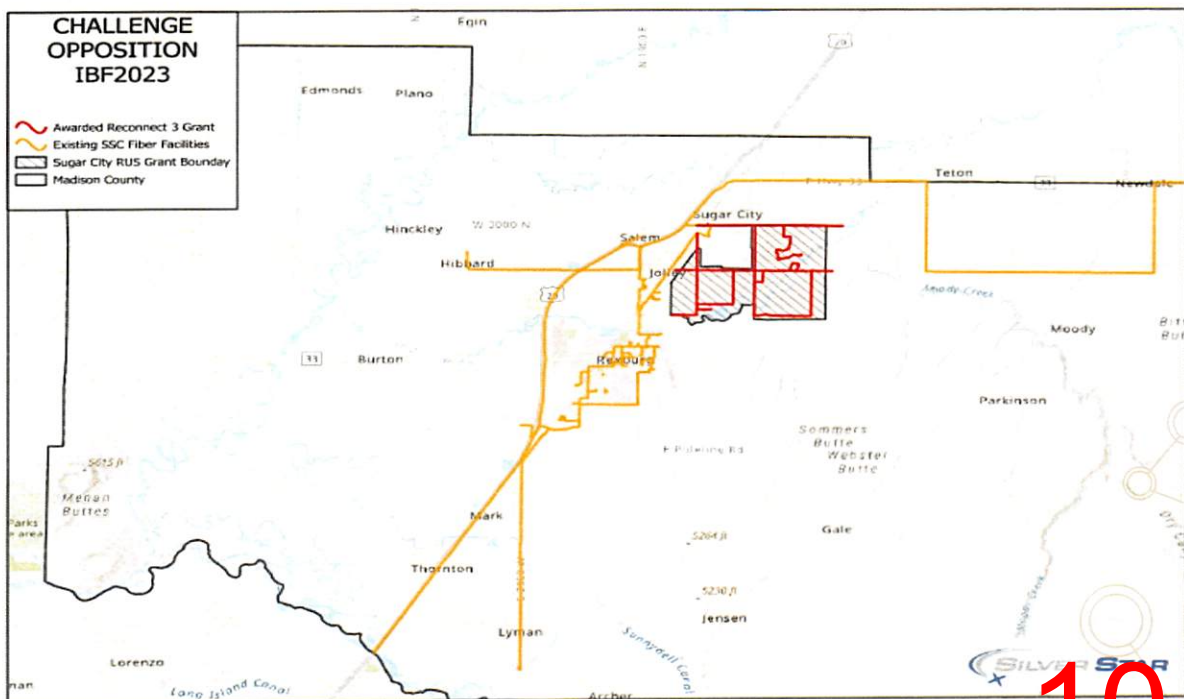
Re: Idaho Broadband Fund Grant Program (“IBF”)
Challenge Comments of Columbine Telephone Company, Inc.

Applicant: Lightbridge Community Network

To Whom It May Concern:

Columbine Telephone Company, Inc. dba Silver Star Communications (“Silver Star”) hereby submits its comments with respect to the above Applicant’s proposal submitted to the Idaho Broadband Advisory Board in response to its October 2022 Request for Proposals.

Silver Star has carefully reviewed Applicant’s proposal and it appears Applicant is seeking funds to overbuild in an area that already has a substantial amount of fiber assets. Specifically, Silver Star has invested significant funds over the past few years constructing a robust and redundant fiber transport network that provides middle mile connectivity in the proposed area. Illustrated below is a depiction of Silver Star existing facilities.



Idaho Department of Commerce
Attn: Ramón S. Hobdey-Sánchez, J.D.
State Broadband Program Manager
January 6, 2023
Page 2

Silver Star has served the Rexburg and Madison County, Idaho communities for the past several years; along with its affiliates, it has over 65 years' experience constructing, managing and operating a sophisticated and wide-spread broadband network. Star is apprehensive about the concept of using State funds to overbuild an existing middle mile network and asks that the Board take a fiduciary approach that ensures State funding resources are employed to make the most impact to end users within the community, as well as to consider any precedent or harm to an existing provider that may result.

Thank you for the opportunity to respond and provide comments to the Board. We trust the Board will take into consideration these concerns in its review of the submitted proposals. Questions about these comments may be directed to my attention.

Regards,



Paul Petersen
Chief Operating Officer
208-354-6788

Totals: \$ 507,042,856 \$ 345,869,780 \$ 162,421,099 32% Average Match

Applicant	Region	Contact	Contact Title	Title	Applicant type	Total Project	Grant Request	Match	Match %	Locations	Grant Dollars per Address
Ada County/City of Boise	3	Alex Winkler	Boise IT Director	Greater Treasure Valley Network	Government	\$ 42,029,782	\$ 20,849,593	\$ 21,180,189	50%		\$ -
Anthem Broadband	3	Kevin Neal	Network Architect	Marsing to Grandview Middle Mile	Private	\$ 5,404,010	\$ 4,699,139	\$ 704,871	13%	230	\$ 20,431
ATC Communications	4	Kyle Bradshaw	General Manager	Rural Cassia Middle Mile	Co-op	\$ 856,000	\$ 513,600	\$ 342,400	40%	610	\$ 842
Blackfoot Communications	6	Michelle Owens	Regulatory Specialist/Paralegal	Island Park Proposal	Co-op	\$ 4,017,863	\$ 2,008,932	\$ 2,008,931	50%	500	\$ 4,018
Cambridge Telephone Company	3	James Westcott	VP, Customer Service & Business Development	Washington County Middle Mile Project	Co-op	\$ 1,853,291	\$ 926,646	\$ 926,646	50%	78	\$ 11,880
CdA Tribe / Red Spectrum	1	Valerie Fast Horse	IT Director	Coeur d'Alene Reservation	Government	\$ 5,498,991	\$ 4,988,918	\$ 510,073	9%	1,502	\$ 3,322
Charter Communications / Spectrum	1	Stafford Strong	Senior Manager, State Government Affairs	Bonner, Kootenai, Latah	Private	<i>applicant did not disclose costs</i>					
City of Ammon	5	Dan Tracy	IT Director	City of Ammon Middle Mile	Government	\$ 5,200,000	\$ 2,600,000	\$ 2,600,000	50%	2,400	\$ 1,083
City of St. Anthony/Entry Points Network	6	Bruce Patterson	Head of Operations	St. Anthony Middle Mile	Government	\$ 1,824,585	\$ 1,231,085	\$ 593,500	33%	1,221	\$ 1,008
Cox Communication	7	Ken Burgess	Sr. Manager – Market Expansion	Blaine Co	Private	\$ 13,344,887	\$ 13,174,887	\$ 170,000	1%	452	\$ 29,148
Custer Telephone Cooperative	7	J.D. Bennetts	CEO/General Manager	Soda Springs to Tendoy	Co-op	\$ 4,600,000	\$ 2,300,000	\$ 2,300,000	50%	470	\$ 4,894
DIGB2	3	Dave Taylor	Broadband Fiber Project Manager	Idaho District II Interoperability	Government	\$ 10,820,801	\$ 8,004,008	\$ 2,816,793	26%		
Direct Communications	5	Daniel Parrish	Community Development Officer/Legislative Liaison	Franklin County - East River	Private	\$ 4,500,000	\$ 3,500,000	\$ 1,000,000	22%	470	\$ 7,447
Direct Communications	5	Daniel Parrish	Community Development Officer/Legislative Liaison	Firth	Private	\$ 1,600,000	\$ 1,000,000	\$ 600,000	38%	320	\$ 3,125
Direct Communications	5	Daniel Parrish	Community Development Officer/Legislative Liaison	The Reserve	Private	\$ 1,900,000	\$ 1,300,000	\$ 600,000	32%	315	\$ 4,127
Direct Communications	5	Daniel Parrish	Community Development Officer/Legislative Liaison	Pocatello to McCammon	Private	\$ 3,300,000	\$ 2,400,000	\$ 900,000	27%	287	\$ 8,362
Direct Communications	5	Daniel Parrish	Community Development Officer/Legislative Liaison	Blackfoot to Aberdeen	Private	\$ 4,600,000	\$ 3,200,000	\$ 1,400,000	30%	240	\$ 13,333
Direct Communications	5	Daniel Parrish	Community Development Officer/Legislative Liaison	Green Mountain	Private	\$ 3,000,000	\$ 2,500,000	\$ 500,000	17%	206	\$ 12,136
Direct Communications	5	Daniel Parrish	Community Development Officer/Legislative Liaison	Maple Creek	Private	\$ 1,600,000	\$ 1,300,000	\$ 300,000	19%	165	\$ 7,879
Direct Communications	5	Daniel Parrish	Community Development Officer/Legislative Liaison	Franklin County - West River	Private	\$ 2,420,000	\$ 2,070,000	\$ 350,000	14%	161	\$ 12,857
Direct Communications	5	Daniel Parrish	Community Development Officer/Legislative Liaison	Soda Springs to Georgetown	Private	\$ 3,200,000	\$ 2,800,000	\$ 400,000	13%	120	\$ 23,333
Direct Communications	5	Daniel Parrish	Community Development Officer/Legislative Liaison	Virginia	Private	\$ 1,900,000	\$ 1,700,000	\$ 200,000	11%	90	\$ 18,889
Direct Communications	5	Daniel Parrish	Community Development Officer/Legislative Liaison	East Riverside	Private	\$ 830,000	\$ 690,000	\$ 140,000	17%	70	\$ 9,857
Direct Communications	5	Daniel Parrish	Community Development Officer/Legislative Liaison	Rabbit Mountain	Private	\$ 525,000	\$ 425,000	\$ 100,000	19%	49	\$ 8,673
Direct Communications	5	Daniel Parrish	Community Development Officer/Legislative Liaison	Bonida	Private	\$ 560,000	\$ 460,000	\$ 100,000	18%	47	\$ 9,787
Direct Communications	5	Daniel Parrish	Community Development Officer/Legislative Liaison	Winder	Private	\$ 584,000	\$ 484,000	\$ 100,000	17%	42	\$ 11,524
Direct Communications	5	Daniel Parrish	Community Development Officer/Legislative Liaison	Sulphur Canyon	Private	\$ 530,000	\$ 430,000	\$ 100,000	19%	37	\$ 11,622
Direct Communications	5	Daniel Parrish	Community Development Officer/Legislative Liaison	Swan Lake	Private	\$ 400,000	\$ 325,000	\$ 75,000	19%	32	\$ 10,156
Direct Communications	5	Daniel Parrish	Community Development Officer/Legislative Liaison	Bear River Bluffs	Private	\$ 135,000	\$ 100,000	\$ 35,000	26%	12	\$ 8,333
Farmers Mutual Telephone Company	3	Ron Rembelski	General Manager	Payette Middle Mile	Co-op	\$ 1,114,400	\$ 835,800	\$ 278,600	25%	110	\$ 7,598
Fatbeam	3	Ty Snyder Sr.	Government Account Executive	Elmore County FTTH	Private	\$ 2,387,170	\$ 1,909,736	\$ 477,434	20%	175	\$ 10,913
Fatbeam	3	Ty Snyder Sr.	Government Account Executive	New Plymouth to Emmett	Private	\$ 1,233,375	\$ 986,700	\$ 246,675	20%	150	\$ 6,578
Fybercom	7	George Swanson	Chief Human Resources Officer	Rexburg to Mud Lake to Leadore to Salmon to C	Private	\$ 12,597,500	\$ 9,448,125	\$ 3,149,375	25%	2,568	\$ 3,679
Idaho Falls Fiber	6	Bear Prairie	General Manager	FTTH	Government	\$ 7,000,000	\$ 3,500,000	\$ 3,500,000	50%	8,000	\$ 438
Inland Cellular	2	Mike Bly	SVP, Business Operations	Waha Fiber to the Premises	Private	\$ 1,655,645	\$ 1,608,245	\$ 47,400	3%	165	\$ 9,747
Inland Cellular	2	Mike Bly	SVP, Business Operations	Stites Fixed Wireless	Private	\$ 251,046	\$ 238,546	\$ 12,500	5%	60	\$ 3,976
Intermax Networks	1	Mike Kennedy	President and CEO	Kootenai County	Private	\$ 4,796,239	\$ 2,398,119	\$ 2,398,120	50%	4,350	\$ 551
Intermax Networks	1	Mike Kennedy	President and CEO	Bonner County - Selle Valley	Private	\$ 3,943,484	\$ 2,563,265	\$ 1,380,219	35%	3,364	\$ 762
IRON	2	Jaynie Bentz	General Manager	Grangeville to Star	Non-profit	\$ 80,000,000	\$ 60,000,000	\$ 20,000,000	25%		\$ -
Lincoln County	4	Rebecca Wood	County Commissioner	Lincoln County Broadband Plan - Phase 2	Government	\$ 6,966,521	\$ 6,966,521	\$ 369,845	5%	2,567	\$ 2,714
Madison County/City of Rexburg	6	Bradley Petersen	Administrator	Madison County Broadband	Government	\$ 13,343,187	\$ 10,674,549	\$ 2,668,637	20%	2,171	\$ 4,917
MiFiber	1	Jason Mocca	CEO	Priest River	Private	\$ 3,818,825	\$ 2,673,178	\$ 1,145,648	30%	895	\$ 2,987
Mud Lake Telephone Cooperative	6	Valeri Steigerwald	General Manager	Planning grant	Co-op	\$ 27,000	\$ 27,000	\$ -	0%		\$ -
Oregon Idaho Utilities	3	Randy Mead	General Manager	Greenleaf to Wilder to Homedale to Oregon Bo	Co-op	\$ 725,000	\$ 507,000	\$ 218,000	30%	1,500	\$ 338
PMT	4	Scott Draper	Director of Engineering/Construction	South of Burley, North of Oakley	Co-op	\$ 1,150,000	\$ 805,000	\$ 345,000	30%		\$ -
PMT	4	Scott Draper	Director of Engineering/Construction	Paul West, Coats, Bronze	Co-op	\$ 558,000	\$ 390,600	\$ 167,400	30%		\$ -
PMT	4	Scott Draper	Director of Engineering/Construction	Quarterhorse	Co-op	\$ 520,000	\$ 364,000	\$ 156,000	30%		\$ -
PMT	4	Scott Draper	Director of Engineering/Construction	Minidoka Dam	Co-op	\$ 475,000	\$ 332,500	\$ 142,500	30%		\$ -
PMT	4	Scott Draper	Director of Engineering/Construction	Heyburn to Burley	Co-op	\$ 394,000	\$ 275,800	\$ 118,200	30%		\$ -
PMT	4	Scott Draper	Director of Engineering/Construction	Paul to Burley	Co-op	\$ 308,000	\$ 215,600	\$ 92,400	30%		\$ -
PMT	4	Scott Draper	Director of Engineering/Construction	Skyline Area	Co-op	\$ 168,000	\$ 117,600	\$ 50,400	30%		\$ -
Port of Lewiston	2	Scott Corbitt	General Manager	Moscow-Lewiston, Lewiston-Grangeville	Government	\$ 11,878,236	\$ 6,260,313	\$ 5,617,923	47%		\$ -
Rally Networks	3	Marcus Bott	VP of Operations	Boise Airport	Private	\$ 10,000,000	\$ 2,080,166	\$ 7,919,834	79%	3,000	\$ 693
Rural Telephone Company (Pend Oreille T)	3	Susan Case	Human Resources Manager	FTTH Hammett	Co-op	\$ 1,379,719	\$ 1,379,719	\$ 534,000	39%		\$ -
Silver Star Communications	6	Michelle Motzkus	Legal & Regulatory Administrator	FTTP Teton Valley	Co-op	\$ 49,670,285	\$ 15,673,351	\$ 33,996,934	68%	4,199	\$ 3,733
Silver Star Communications	6	Michelle Motzkus	Legal & Regulatory Administrator	FTTP Swan Valley and Irwin	Co-op	\$ 11,217,992	\$ 1,962,509	\$ 9,255,483	83%	549	\$ 3,575
Sparklight (Cable One Inc.)		Patrick Caron	General Counsel	Letter to request participation	Private						\$ -
Syringa Networks	3	Paul C. Desaulniers	Director of Field Operations	Rural Southwestern Idaho	Co-op	\$ 10,744,013	\$ 6,209,732	\$ 4,534,281	42%	330	\$ 18,817
Tekniam		Kevin Griffith	Business Development	Letter to introduce themselves	Private						\$ -
White Cloud Communications, Inc.	3	Eric Smallwood	Sales Executive/Project Manager	Owyhee County Middle Mile	Private	\$ 5,511,853	\$ 4,960,668	\$ 551,185	10%	222	\$ 22,345
Ziply Fiber		Chris St. Germaine	Local Partnerships Manager	Network Wide	Private	\$ 99,213,336	\$ 78,290,863	\$ 20,922,473	21%	15,207	\$ 5,148
Ziply Fiber	2	Chris St. Germaine	Local Partnerships Manager	Riggins to Orofino	Private	\$ 33,932,977	\$ 33,932,977	\$ 344,177	1%	5,383	\$ 6,304
Ziply Fiber	3	Chris St. Germaine	Local Partnerships Manager	Boise to Horseshoe Bend	Private	\$ 3,027,843	\$ 2,300,790	\$ 727,053	24%	2,147	\$ 1,072

Port of Lewiston

1626 6th Avenue N. • Lewiston, ID 83501

(208) 743-5531

E-mail: portinfo@portoflewiston.com

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General Manager

Scott M. Corbitt

Operations Manager

Traffic Manager

Kim Petrie

January 5, 2023

Idaho Broadband Advisory Board
c/o Ramón S. Hobdey-Sanchez, J.D.
State Broadband Program Manager
Idaho Department of Commerce
700 W. State St.
Boise, Idaho 83702

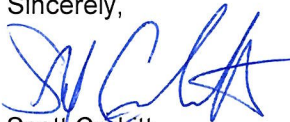
Program Manager Hobdey-Sanchez and members of the Idaho Broadband Advisory Board,

The Port of Lewiston strongly supports Idaho Regional Optical Network's (IRON's) project to construct a 198-mile open-access middle mile fiberoptic backbone from Grangeville to Star. When combined with the Port of Lewiston's middle mile project from Moscow to Grangeville, the IRON project will complete the connection of northern to southern Idaho with open access, fiber optic infrastructure.

The collaboration between IRON, the Port, and the other partners working on the open access middle mile backbone represents the best chance to build this critical infrastructure. The project is more than shovel ready, with considerable engineering already completed. IRON's project creates resiliency to prevent loss of service in the event of a fiber cut. As open access infrastructure, the project creates a free-market environment that will ensure cost effective internet access for folks across the State. IRON's project will also position the communities along the backbone to take advantage of BEAD funding opportunities from the National Telecommunications and Information Administration to further strengthen Idaho's broadband connectivity.

IRON's Grangeville to Star project is precisely the type of project to deliver the biggest impact for Idaho. Combined with the Port's Moscow to Grangeville project, this new open access backbone will finally connect north to south with reliable, redundant high-speed broadband. The Port of Lewiston fully supports IRON's project.

Sincerely,



Scott Corbitt

General Manager

Port of Lewiston

scott@portoflewiston.com

1(208)413-3110

From: Diane Wheeler <idahofit10@gmail.com>
Sent: Friday, January 6, 2023 8:54 AM
To: COM Broadband <broadband@commerce.idaho.gov>
Subject: Idaho Broadband Fund Grant Application from Intermax Networks

Dear Grant Committee,

My family moved to the Selle Valley several years ago to build a home after we moved away from a city with fixed wireless antennas. Because of health problems, we purposely moved to this area to be away from these types of city services. I have read the grant proposal from Intermax Networks and they intend to propagate the Selle Valley with wireless internet service. I am opposed to that!

I was on the committee that produced the Selle-Samuels Community Area Plan. Our committee first met on November 28, 2016. We signed off our final report with recommendations to the Bonner County Planning Department on February 18, 2020. The Planning Department was drafting the Comp Plan for Bonner County and requested the committee meet with the residents to determine how we wanted our area developed and what kind of infrastructure of services was desired. We heard from hundreds of area residents. In Appendix D which is the Land Use Designations, we voted against adding wireless telecommunication facilities any closer than 5 miles to area homes.

Please follow the will of the people and provide wired, not wireless services.

Thank you,

Diane Wheeler

Idaho Broadband Advisory Board
c/o Ramón S. Hobdey-Sánchez, J.D.
State Broadband Program Manager
Idaho Department of Commerce
700 W. State St., Boise, ID 83702

Re: Fibercom Grant Application – Blackfoot to Arco to Howe Middle Mile

As a telecommunications provider for over 90 years, ATC Communications shares the same strategic goal that the State of Idaho has outlined – to deploy fiber to all of Idaho. To reach that goal, ATC believes that any investment made in areas that already have fiber infrastructure would be an inadequate use of funds and should instead go toward communities that lack fiber optics. After reviewing the applications, ATC believes the following project should not be considered for funding:

Project Name/Description: Blackfoot to Arco to Howe Middle Mile
Submitted By: Fibercom LLC
RFI Page #: 157

Summary: Of the 75-mile proposed route, ATC has existing buried fiber optic cable for 24 of those miles (or 32% of the route). Every single location from Arco to Howe is already served with fiber or copper facilities.

Details: ATC Communications has been providing fiber optic Internet service to Butte County for over 25 years. We currently serve the communities of Arco & Howe using a combination of fiber, copper, and wireless. Over the last few years, we have built a strong and reliable fiber middle-mile that goes from Howe all the way to Mackay. Now that the middle mile is built, we are well-positioned to accelerate the deployment of fiber drops and plan to invest millions in Butte County over the next few years. Also, the network is already part of a larger state-wide fiber ring through our partnership with Syringa Networks. This ring provides protection and reliability to those communities in case of a fiber cut.

Given the strength of our existing network and our plan to extend fiber to every single home in Butte County, we believe Fibercom's proposed project should not be funded. State grant dollars should go towards unserved locations instead of a project that provides duplicative fiber service.

Note: All of ATC's deployment data has been provided to the FCC and is part of the new National Broadband Map (see broadbandmap.fcc.gov).

Thank you for your consideration,



Kyle Bradshaw
General Manager





PO Box 324 • 1101 E. Main Ave. Challis, ID. 83226 • Telephone: (208) 879 2281 • Fax: (208) 879 5211

Dear Members of the Idaho Broadband Advisory Board and the Idaho Department of Commerce,

I want to thank you for the opportunity to submit comments regarding the Middle Mile Grant applications. I would like to provide the following comments to give a little more perspective and information that I hope is helpful to your decision making process.

- a. Reliable Fiber Optic backhaul into the Salmon area already exists, therefore the expense of a new backhaul link into the Salmon area is not required. CusterTel currently operates a high capacity and redundant fiber optic connection from Salmon to Challis with connectivity to Syringa Network's Statewide optical ring. Lumen also has fiber optic connectivity backhaul from eastern Idaho along highway 28 into the Salmon area.
- b. I question whether Fybercom's application to construct facilities from Rexburg to North Fork is shovel ready. The application states "Our planning, engineering and inventory are advanced enough that construction can begin as soon as permitting processes are complete." Permitting can take months or sometimes years to complete. Construction resources and Supplies are currently very limited so it is unlikely that Fybercom will be able to secure all necessary contractors, permits, and supplies in 3 months and be ready for construction of over 200 miles of cable across multiple counties, public lands, and state rights of way. CusterTel's application is shovel ready because we are proposing to expand a project that we already have resources dedicated to.
- c. The City of Salmon is not underserved. Gigabit internet service is available in the City of Salmon and other locations in the surrounding area.
- d. Fybercom's fiber path does not include Highway 93 S. from Salmon, but yet their location count includes locations along that corridor. CusterTel already has FTTH distribution connectivity in that area as well as the highway 28/Lemhi Road corridor outside of Salmon toward Baker.
- e. It is likely that Fybercom's middle mile project between Rexburg and North Fork will cost more than the proposed \$12,597,500. Constructing FTTH drops to all of the unserved locations along that route will require much more additional capital. Does the applicant have the financial capacity to finish the build without the hope of other future grants that may not be awarded?

This institution is an equal opportunity provider and employer.

- f. It was stated that this project will “greatly enhance the use of E911 services in this geographic area” I’m curious as to how this project will enhance E911 service? Like them or not, Lumen currently backhauls the E911 connections to the Lemhi County PSAP on their existing network and the proposed Fybercom network will not have the capability to deliver E911 connectivity due to the Legacy technology used by current E911 connections. Cellular and Landline providers in the area already have existing E911 connections that are already required to meet current regulatory requirements for redundancy and uptime.

In order to connect as many Idahoans to Broadband as possible I feel it is important to maximize the usage of existing infrastructure. CusterTel is already well positioned to continue to expand our existing fiber optic network in the Salmon area at a much lower cost to the State of Idaho than the application submitted by Fybercom.



J.D. Bennetts
CEO/General Manager



January 6, 2023

VIA email: broadband@commerce.idaho.gov

Idaho Department of Commerce
Attn: Ramón S. Hobdey-Sánchez, J.D.
State Broadband Program Manager
700 W. State St.
Boise, Idaho 83702

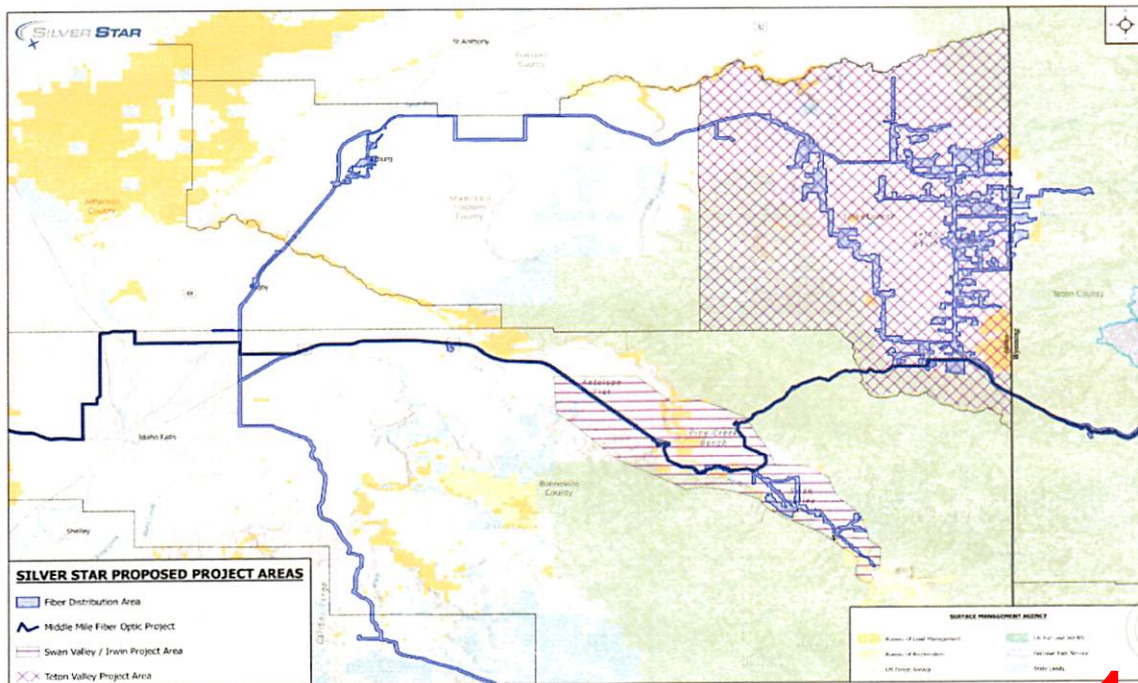
Re: Idaho Broadband Fund Grant Program (“IBF”)
Challenge Comments of Columbine Telephone Company, Inc.

Applicant: Fybercom (Ririe/Swan Valley/Palisades/Tetonia)

To Whom It May Concern:

Columbine Telephone Company, Inc. dba Silver Star Communications (“Silver Star”) hereby submits its comments with respect to the above Applicant’s proposal submitted to the Idaho Broadband Advisory Board in response to its October 2022 Request for Proposals.

Silver Star has carefully reviewed Applicant’s proposal and it appears Applicant is seeking funds to overbuild in an area that already has a substantial amount of fiber assets. Specifically, Silver Star has invested significant funds over the past few years constructing a robust and redundant fiber network that provides middle mile connectivity in the proposed area. Illustrated below is a depiction of Silver Star existing facilities.



Idaho Department of Commerce
Attn: Ramón S. Hobdey-Sánchez, J.D.
State Broadband Program Manager
January 6, 2023
Page 2

Silver Star has served the Swan Valley and Teton Valley, Idaho communities for over 25 years; along with its affiliates, it has over 65 years' experience constructing, managing and operating a sophisticated and wide-spread broadband network. Silver Star's policy is to interconnect with requesting providers at rates that are market-competitive, although dictated by its existing tariff regulations. Competitive service is possible, however is hindered by the reduced return on investment prevalent in rural areas. Silver Star strives to work collaboratively with other providers; further, Silver Star is constantly working to improve its service and to extend connections to rural, remote customers and also does have a fixed wireless offering which is employed to serve those customers for which fiber (or copper) facilities have not yet been built. Star is apprehensive about the concept of using State funds to overbuild an existing middle mile network and asks that the Board take a fiduciary approach that ensures State funding resources are employed to make the most impact to end users within the community, as well as to consider any precedent or harm to an existing provider that may result.

Thank you for the opportunity to respond and provide comments to the Board. We trust the Board will take into consideration these concerns in its review of the submitted proposals. Questions about these comments may be directed to my attention.

Regards,



Paul Petersen
Chief Operating Officer
208-354-6788

From: Mike Knittel <mknittel@cityofemmett.org>
Sent: Wednesday, January 4, 2023 2:18 PM
To: COM Broadband <broadband@commerce.idaho.gov>
Subject: FatBeam Support

Greetings Idaho Broadband Advisory Board,

I am writing to express support from the City of Emmett in regard to the submitted middle-mile fiber project from New Plymouth to Emmett. This critical broadband pathway is necessary for economic and residential development to expand into the west side of Gem County. There are few-to-no high-speed reliable options along the proposed pathway. The City of Emmett will benefit from additional capacity and the continued benefits that we have seen firsthand with public-private partnerships. This middle-mile build would also set the stage for continued pass-through of middle-mile fiber along Highway 16 into Ada County, creating a resilient pathway to interconnect multiple jurisdictions.

Thank you for your time and consideration.

Respectfully,

Mike Knittel
IT Director
City of Emmett
501 E. Main St.
Emmett, ID 83617
Office: (208) 398-2100

From: Colin Higgin <colin.higgin@zitomedia.com>
Sent: Thursday, January 5, 2023 1:52 PM
To: COM Broadband <broadband@commerce.idaho.gov>
Cc: Ramon Hobdey-Sanchez <ramon.hobdeysanchez@commerce.idaho.gov>
Subject: Re: Comments by Zito West Holding, LLC related to the Elmore County Fiber to the Home and Middle Mile Proposal of Fatbeam (pages 188-197 of the submitted proposals)

Idaho Broadband Fund

Zito West Holding, LLC hereby files this response to the proposal filed by Fatbeam seeking \$1.9 million for its proposed Elmore County Fiber to the Home project. As demonstrated below, and as shown in the attached maps, Zito West Holding, LLC already provides robust broadband internet access service with download speeds of 1 Gigabit per second to homes in Elmore County, which means this area is **not** unserved (nor it is “underserved”). The Department should not use taxpayer funds to subsidize the overbuilding of existing broadband networks in areas already served by ISPs, like Zito West Holding, LLC, who have used private capital to deploy and operate these networks.

The details of Fatbeam’s proposed Elmore County Fiber to the Home project are set forth on pages 188-197 of the company’s submitted proposals: (<https://commerce.idaho.gov/content/uploads/2023/01/IBAB-RFP-1.2.23.-3.0.pdf>). In that proposal Fatbeam asserts that the project will provide fiber to the home for “roughly 175 unserved and underserved homes” in Hammett and South Elmore County. *See* p. 189 (response to question 1). Fatbeam repeats this unsupported assertion that homes in this area are “unserved”, *see* p. 190 (response to question 11) and that this proposal is in line with the Idaho Broadband Advisory Board’s strategic plan to provide fiber to the home to unserved households.

The fundamental problem with Fatbeam’s proposal is that contrary to its unsupported assertion, households in this area are **not** unserved. I have attached maps of our Zito West Holding, LLC service areas in Mountain Home, Idaho and the Mountain Home Air Force Base. These maps show Zito West Holding, LLC’s service area to residential customers is along Fatbeam’s planned middle mile route from Mountain Home, Idaho to Hammett, Idaho that would be used to deploy last mile connections to homes already served by Zito West Holding, LLC.

Zito West Holding, LLC’s high-speed data speeds offered to that service area are 1Gbps downstream and 25Mbps upstream, which clearly meet the speed requirements of the FCC and Idaho to be considered a served high-speed data area. Therefore, Fatbeam’s Elmore County Fiber to the Home project should be denied as to the request for funding to serve “approximately” 175 homes

referenced in Fatbeam’s proposal, see p. 189 (response to question 3), and it should only be permitted to use its grant project funds of \$1.9 million for the middle mile project from Mountain Home to Hammett, Idaho and the Fiber to the Home project in Hammett, Idaho (but not for construction of a Fiber to the Home project along its proposed middle mile project in those areas already served by Zito West Holding, LLC).

In the recent Infrastructure Investment and Jobs Act, Congress directed NTIA to assure that states prioritize “unserved” areas over “underserved” areas,^[1] consistent with the long-standing policy priority of the Federal Communications Commission to “target those areas that current data confirm are wholly unserved.”^[2] While this project may not be formally governed by those authorities, the wisdom of those policy decisions applies here.

Commerce Secretary Raimondo has explained that federal broadband funding policy “provides a crystal clear framework to prioritize unserved then underserved” because it is “vital that we first get broadband to everybody and we’re going to do that so that we don’t run the risk of overbuilding and running out of money.”^[3]

Failure to adhere to these well-established principles is likely to lead to duplicative investment and wasteful overbuilding of existing networks that are built and operated using private capital. Indeed, directing significant funding to areas where a provider is already offering 1 Gbps download or greater broadband service would lead to overbuilding of existing networks, the vast majority of which were built using private capital and without federal taxpayer funds or

^[1] See IJIA, § 60102(h)(1)(A)(i)(I). While other programs have permitted the use of federal funds for deployment of broadband networks in areas already served by an existing provider, early results of those decisions suggest that there may be significant disputes, litigation and lost opportunity when subsidies are spent on areas already served by an existing provider. These problems are exacerbated when those decisions are based on faulty, incomplete or inaccurate data such as speed tests and consumer surveys.

^[2] See *Rural Digital Opportunity Fund*, Report and Order, 35 FCC Rcd. 686, at 688, ¶ 5. See also *See. e.g., Report on the Future of the Universal Service Fund*, WC Docket No. 21-476, Notice of Inquiry, FCC 21-127 ¶ 5 (Dec. 15, 2021) (discussing the Broadband Equity, Access, and Deployment Program and noting that funding should be awarded “in a way that gives priority to projects that will provide service to unserved locations, then to underserved locations”); Letter from M. O’Rielly, Comm’r, FCC, to C. McLean, Acting Administrator, Rural Utilities Service, Docket No RUS-18-TELECOM-0004 (Sept. 10, 2018) (“Funding available for broadband deployment is scarce, and many areas, particularly those in the hardest-to-reach parts of the country, remain subject to coverage gaps. Therefore, in defining whether an area has ‘sufficient access,’ [government] should first and foremost direct funding to those communities with no access at all.”).

^[3] See *Secretary Raimondo Testimony*. Expanding Broadband Access: Department of Commerce Broadband Programs in the Infrastructure Investment and Jobs Act, Hearing Before the Subcomm. On Commerce, Justice, Science, and Related Agencies, 117 Cong. (Feb. 1, 2022) (Oral Testimony of Hon. G. Raimondo, Secretary, Dept. of Commerce).

subsidies. Subsidizing providers that overbuild existing networks would create significant disincentives for broadband providers that leverage private capital to invest in rural broadband in the future. Further, enabling a government-supported or funded network to overbuild an existing network would pose significant competitive concerns and would create an uneven playing field in which the government has picked winners and losers in the marketplace.

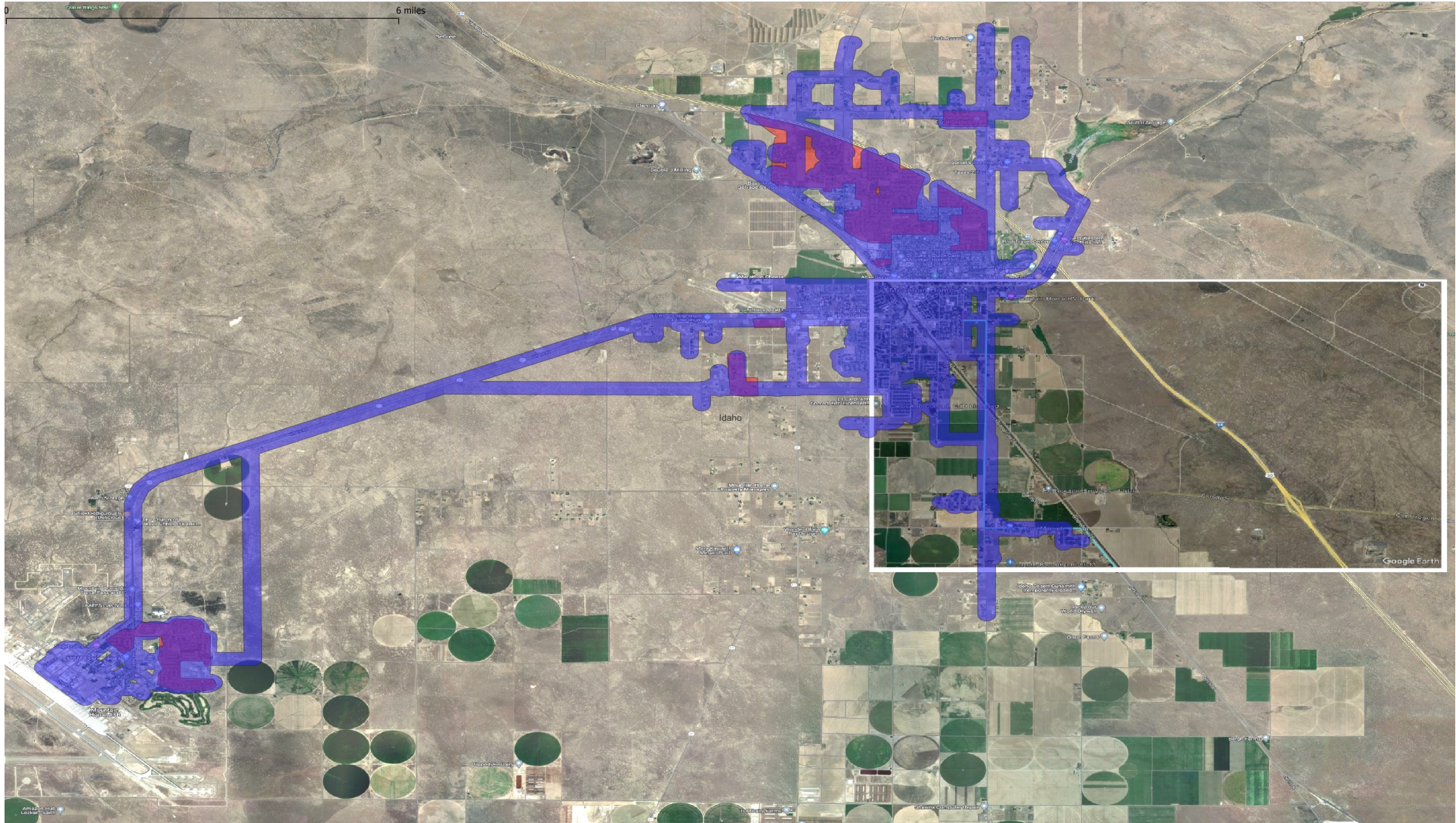
1 See IIIJA, § 60102(h)(1)(A)(i)(I). While other programs have permitted the use of federal funds for deployment of broadband networks in areas already served by an existing provider, early results of those decisions suggest that there may be significant disputes, litigation and lost opportunity when subsidies are spent on areas already served by an existing provider. These problems are exacerbated when those decisions are based on faulty, incomplete or inaccurate data such as speed tests and consumer surveys.

2 See Rural Digital Opportunity Fund, Report and Order, 35 FCC Rcd. 686, at 688, ¶ 5. See also *See. e.g., Report on the Future of the Universal Service Fund*, WC Docket No. 21-476, Notice of Inquiry, FCC 21-127 ¶ 5 (Dec. 15, 2021) (discussing the Broadband Equity, Access, and Deployment Program and noting that funding should be awarded “in a way that gives priority to projects that will provide service to unserved locations, then to underserved locations”); Letter from M. O’Rielly, Comm’r, FCC, to C. McLean, Acting Administrator, Rural Utilities Service, Docket No RUS-18-TELECOM-0004 (Sept. 10, 2018) (“Funding available for broadband deployment is scarce, and many areas, particularly those in the hardest-to-reach parts of the country, remain subject to coverage gaps. Therefore, in defining whether an area has ‘sufficient access,’ [government] should first and foremost direct funding to those communities with no access at all.”).

3 See Secretary Raimondo Testimony. Expanding Broadband Access: Department of Commerce Broadband Programs in the Infrastructure Investment and Jobs Act, Hearing Before the Subcomm. On Commerce, Justice, Science, and Related Agencies, 117 Cong. (Feb. 1, 2022) (Oral Testimony of Hon. G. Raimondo, Secretary, Dept. of Commerce).

Please feel free to call me with any questions.

Thanks
Colin Higgin
Vice President and General Counsel
Zito West Holding, LLC
814-260-9588



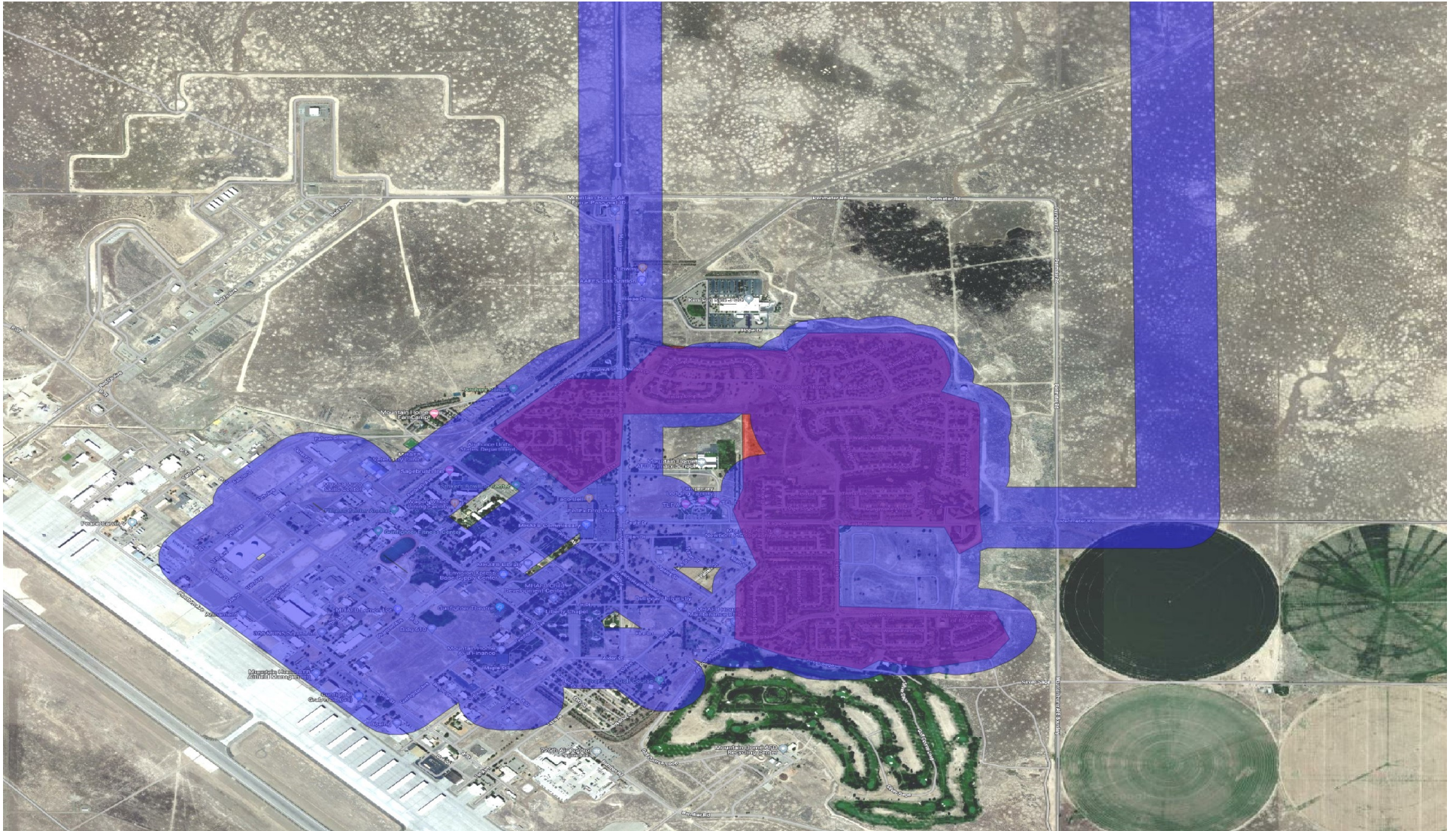
Idaho Broadband Fund Grant - Zito Media Existing Broadband Service Areas

Overall Service area: Mountain Home, ID & Mountain Home Air Force Base

Blue polygon = Existing 1000 Mbps x 25 Mbps Hybrid Fiber Coaxial service area

Violet polygon = Existing 1000 Mbps x 1000 Mbps Fiber To The Home/Premise service area





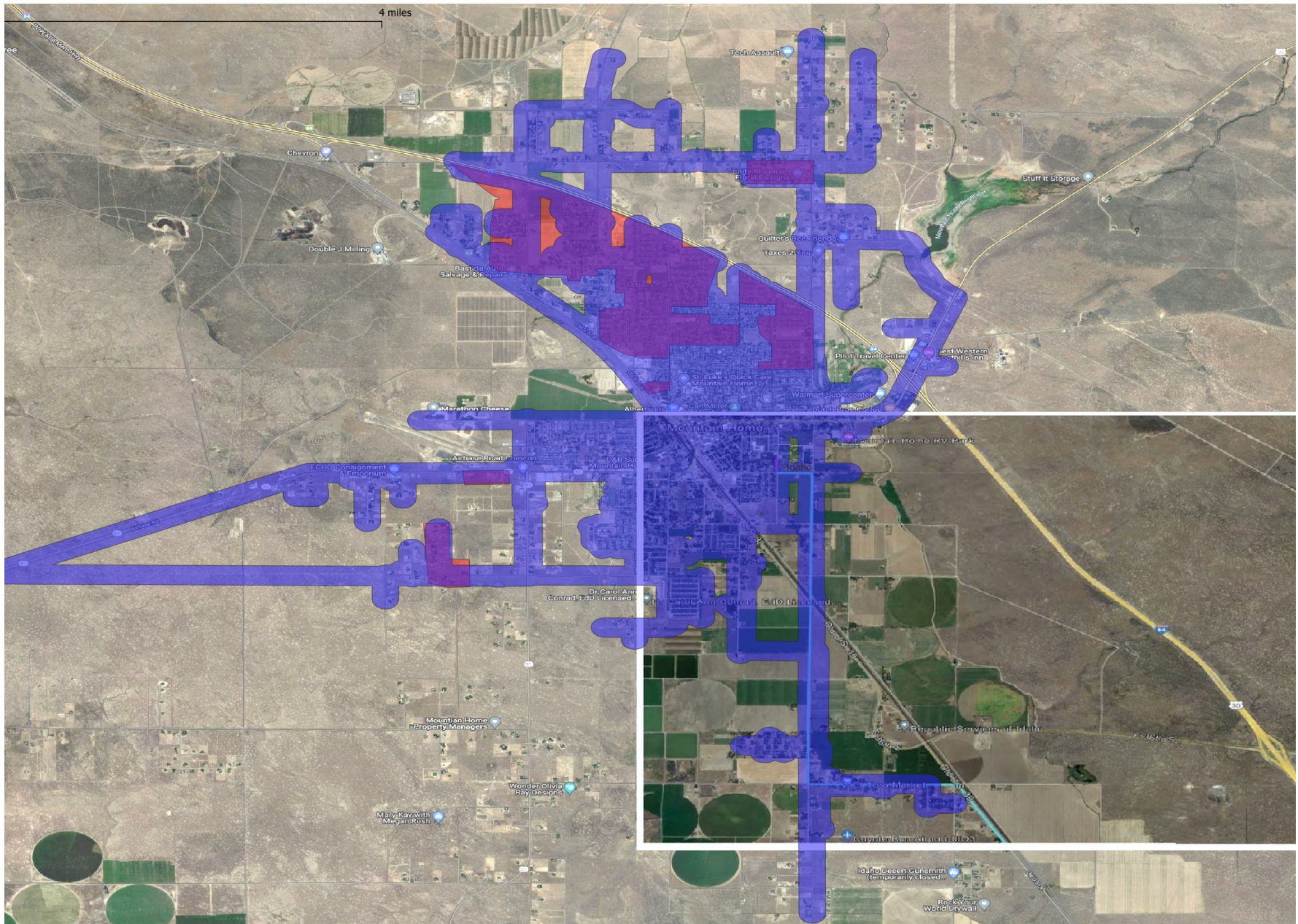
Idaho Broadband Fund Grant - Zito Media Existing Broadband Service Areas

Mountain Home Air Force Base

Blue polygon = Existing 1000 Mbps x 25 Mbps Hybrid Fiber Coaxial service area

Violet polygon = Existing 1000 Mbps x 1000 Mbps Fiber To The Home/Premise service area



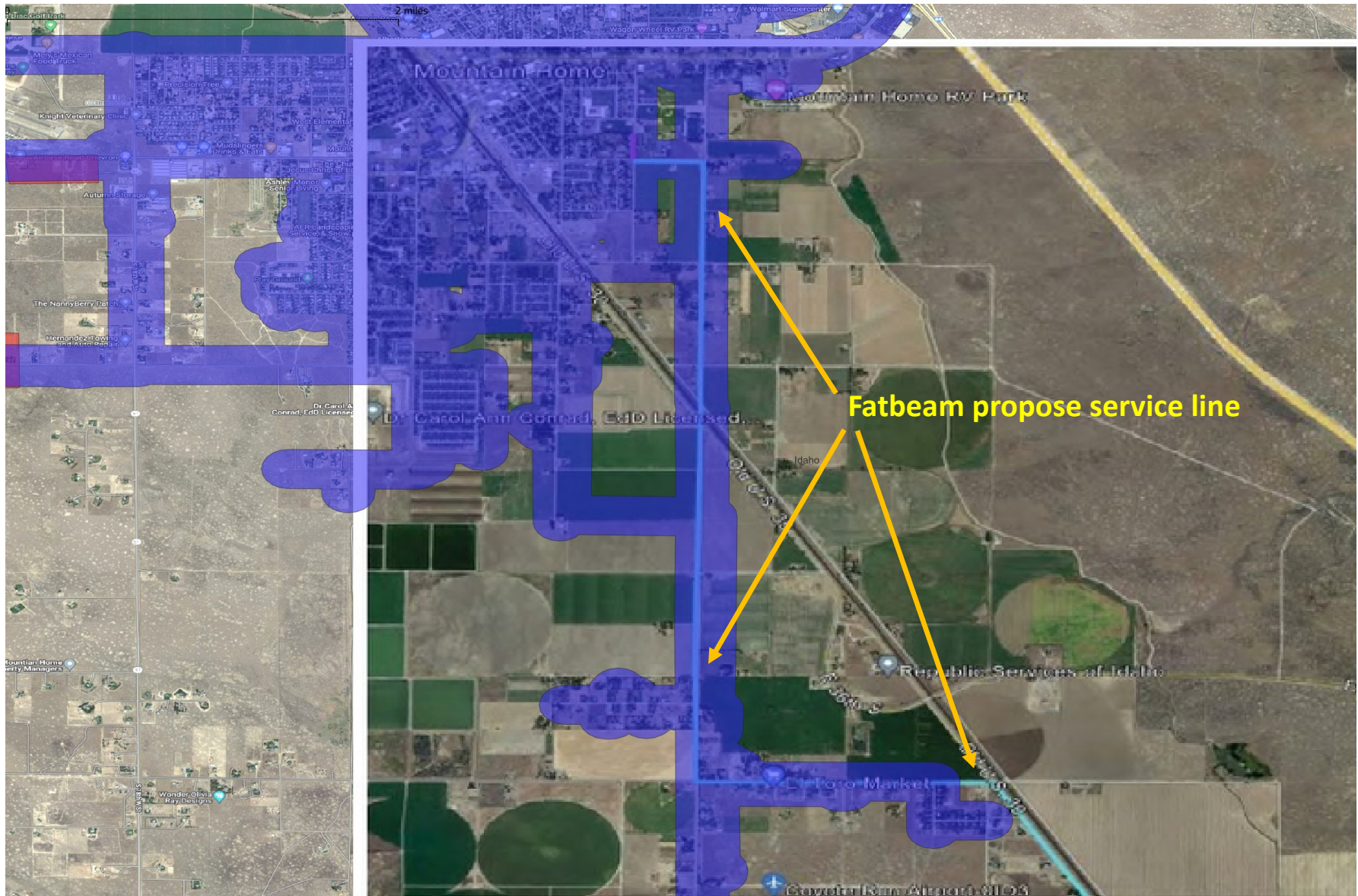


Idaho Broadband Fund Grant - Zito Media Existing Broadband Service Areas

Mountain Home, Idaho

Blue polygon = Existing 1000 Mbps x 25 Mbps Hybrid Fiber Coaxial service area
Violet polygon = Existing 1000 Mbps x 1000 Mbps Fiber To The Home/Premise service area





Idaho Broadband Fund Grant - Zito Media Existing Broadband Service Areas

Fatbeam Proposed Service Line - Mountain Home, Idaho

- Blue polygon = Existing 1000 Mbps x 25 Mbps Hybrid Fiber Coaxial service area
- Violet polygon = Existing 1000 Mbps x 1000 Mbps Fiber To The Home/Premise service area
- Aqua line = Fatbeam proposed service line



January 6, 2023

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Idaho National Laboratory
Idaho State University
State of Idaho
University of Idaho
Washington State University

Ramón S. Hobdey-Sánchez, J.D.
State Broadband Program Manager
Idaho Department of Commerce
700 W. State St., Boise, Idaho 83702
Email: broadband@commerce.idaho.gov

Dear Idaho Broadband Advisory Board:

Please accept our letter of support for the DIGB2 middle mile project of fiber optic infrastructure between Orofino to Nez Perce to Grangeville, Idaho. The need, project development and funding match has been an ongoing collaborative process led by the District II Interoperability Governance Board.

DIGB2 has the strategic mission to provide for emergency and public safety communications in the 5-county region of North Central Idaho. This area is large and rural without redundant communication. Over several years they have diligently formed a governance structure, identified their broadband needs, and defined solutions for their District II broadband plan. This project supports one of the planned legs needed to have access for resilient, reliable communication access that can support next generation technology.

DIGB2 has also collaborated with the North Central Idaho counties and communities to receive financial support in the amount of \$2.8M as matched funding for this project. The region recognizes this is critical infrastructure needed for essential services. Additionally, as open access infrastructure, this project will also benefit the ISPs and provide for economic and last mile access opportunities.

We fully support this infrastructure project that will benefit both the public and private sectors' needs and provide for reliable and redundant high-speed connectivity in North Central Idaho.

Sincerely,
Brent Stacey



President and CEO

Port of Lewiston

1626 6th Avenue N. • Lewiston, ID 83501

(208) 743-5531

E-mail: portinfo@portoflewiston.com

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Traffic Manager

Kim Petrie

January 5, 2023

Idaho Broadband Advisory Board
c/o Ramón S. Hobdey-Sanchez, J.D.
State Broadband Program Manager
Idaho Department of Commerce
700 W. State St.
Boise, Idaho 83702

Program Manager Hobdey-Sanchez and members of the Idaho Broadband Advisory Board,

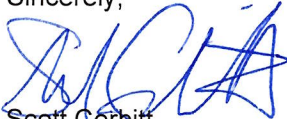
The Port of Lewiston strongly supports District 2 Interoperability Governance Board's (DIGB2's) middle mile project to connect Orofino and Grangeville. This project will provide infrastructure for the counties of Clearwater, Idaho, Latah, Lewis, and Nez Perce, while providing key redundancies in conjunction with the Port of Lewiston's Moscow to Grangeville plan.

DIGB2's project will enhance the value and impact of the other middle mile backbone projects proposed by the Port and by Idaho Regional Optical Network (IRON). DIGB2's project will allow for future District II service providers to purchase connections from the middle mile network for their last mile connections to reliable and cost-effective internet exchange locations. The result will be reduced monopolies that tend to keep prices high and bandwidth, speed, and services low. It will create a level playing field for all broadband providers.

This project will assist in creating reliability for the region's emergency services and emergency response. Advancements in emergency services such as Next Generation E911, inter agency voice and data transmission, location services and mapping require the broadband connectivity that DIGB2's project will provide. This part of North Central Idaho has been described as the "black hole" for broadband connectivity. This project will play a big part in correcting this deficiency.

DIGB2's proposal is part of the coordinated plan to create a middle mile fiber backbone for Region 2 and for Idaho. Combined with the Port's Moscow to Grangeville project and IRON's Grangeville to Star project, this new open access backbone will finally connect north to south with reliable, redundant high-speed broadband. The Port of Lewiston strongly supports DIGB2's proposal.

Sincerely,



Scott Corbitt

General Manager

Port of Lewiston

scott@portoflewiston.com

1(208)413-3110

30



Filed by E-mail

January 6, 2023

Idaho Department of Commerce
Attn: Idaho Broadband Advisory Board
700 W. State St., Boise, ID 83702
broadband@commerce.idaho.gov

RE: Idaho Broadband Fund Grant Application Comments

Dear Idaho Broadband Advisory Board,

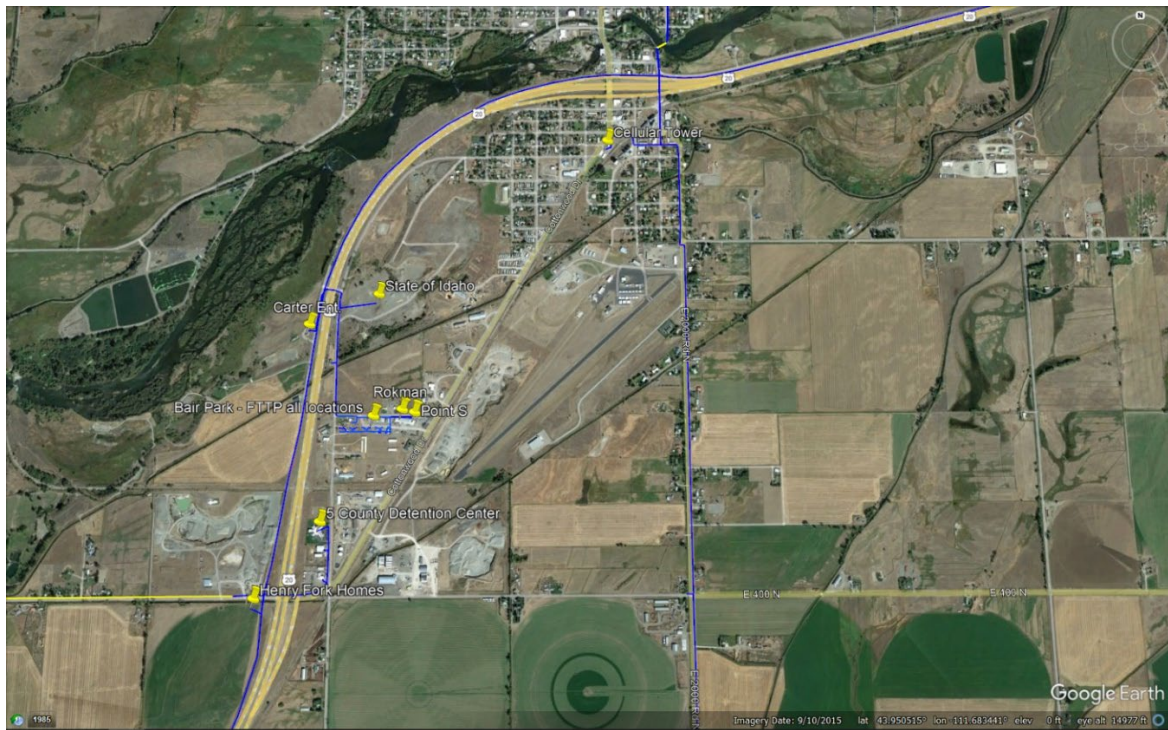
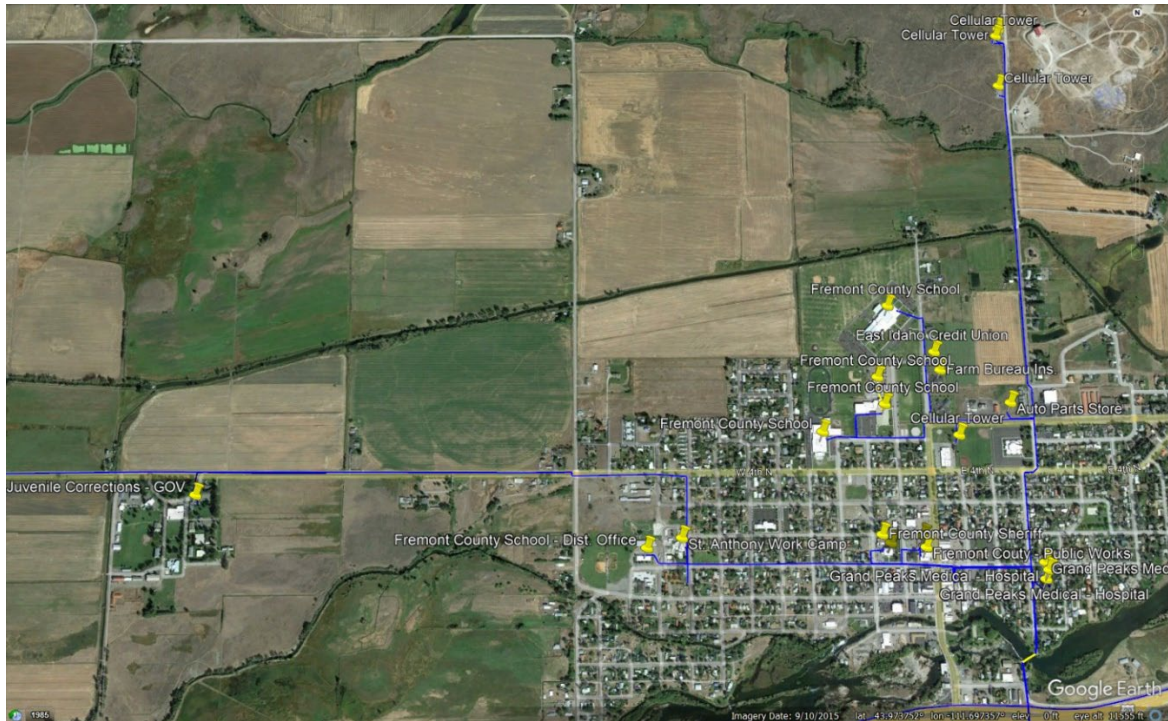
Blackfoot Communications (“Blackfoot”) hereby respectfully submits comments in response to the City of St. Anthony/Entry Point Networks’ (“St. Anthony’s”) grant request to the Idaho Broadband Advisory Board (“Board”) for the St Anthony Middle Mile Broadband Project. **Blackfoot strongly urges the Board to reject this grant request because Blackfoot already has extensive fiber assets and currently provides fiber-based broadband service within the geographic area that is proposed to be built.**

Blackfoot is the incumbent provider in St. Anthony and has extensive fiber, copper, and other telecommunications assets throughout Eastern Idaho. The vast majority of the locations identified in St. Anthony’s grant application request are already served by Blackfoot. Of the 21 locations identified in St. Anthony’s application, Blackfoot currently provides fiber-based services at speeds of more than 1 Gbps to six (6) of the ten (10) wastewater utility locations, two (2) potable water utility locations, four (4) municipal operations locations, including the city hall, public works, airport, plus the hospital, the courthouse and all school buildings.

The St. Anthony grant identifies only four locations which Blackfoot does not serve. However, St Anthony has never made a request to Blackfoot to provide services to those locations. If St. Anthony makes such a request, Blackfoot stands ready to deliver whatever broadband and technology services they need.

Just as important, Blackfoot also provides voice and other telecommunications services to many city offices identified in the grant application. Simply put, Blackfoot is in the best position to provide fiber-based broadband as well as any other communications services St. Anthony and its businesses and residents need.

The maps below show Blackfoot's existing fiber network mirroring the St. Anthony proposed project area. The blue lines are Blackfoot's existing fiber. Yellow pins represent St. Anthony locations currently served by fiber.



Awarding St. Anthony their grant request would overbuild the existing, robust fiber network that already meets their needs today.

In addition, and as stated in its response to the RFI submitted to the Board late last year, Blackfoot already has plans to build fiber-to-the-premises based broadband throughout its entire service territory, more than 5,000 locations covering 2,000 square mile service area in Eastern Idaho, including to all locations within St. Anthony. Importantly, Blackfoot has already invested tens of millions of its own capital dollars within its Eastern Idaho service area to deploy fiber to thousands of end user locations and will continue to invest to meet Idaho consumers' broadband needs. Thus, to the extent a location within St. Anthony lacks fiber-based broadband today, Blackfoot already has plans to build fiber to those locations.

From a public policy standpoint, it should be noted that Blackfoot currently receives Federal Universal Service Fund ("USF") support for its Eastern Idaho service area, including for the St. Anthony exchange area. Blackfoot receives this USF because the Federal Communications Commission ("FCC") has concluded that due to the rural, high cost nature of this area, there is no economic business case to support a broadband provider. Thus, the FCC has awarded Blackfoot federal USF support to financially supplement its operations to provide reliable broadband and voice service. Since there is no business case to support a single broadband provider without federal USF, it does not make sense to use scarce government funds to make a grant award to a second, competing broadband provider (in this case, St. Anthony). In this instance, the St. Anthony proposal makes even less sense since Blackfoot already serves most of the request locations with fiber today!

In addition, Blackfoot has a regulatory obligation to provide voice and broadband services to all locations within its entire Eastern Idaho service territory. The more densely populated areas within the community of St. Anthony are the lowest cost and generally highest revenue areas for Blackfoot to serve. Awarding St. Anthony a grant to overbuild Blackfoot's existing network and "cherry pick" the lowest cost, highest revenue areas will have an adverse economic impact on Blackfoot as it will still have the obligation to provide services to the highest cost areas for all of its St. Anthony exchange and all of Eastern Idaho. Further straining the lower cost revenues Blackfoot receives for its obligation to provide service throughout all of St. Anthony and its other Eastern Idaho service areas could place Blackfoot in financial peril, jeopardizing its operations, including the high quality jobs that it currently provides in Eastern Idaho.

In conclusion, there is no reason to award St. Anthony a grant. Doing so would be a waste of scarce grant funding and result in a duplicate fiber network to what Blackfoot already provides. Thus, ***Blackfoot urges the Board to reject St Anthony's grant request.***

Sincerely,



Jason Williams
Chief Executive Officer



Friday, January 6, 2023

Dan Tracy
City of Ammon IT Director
2135 South Ammon Road Ammon, Idaho 83406
dtracy@cityofammon.us
208-612-4054

Mr. Tracy,

We are pleased to provide this letter of support for the City of Ammon, Idaho application submitted to the Idaho Broadband Fund. We strongly support this grant application and its focus on improving broadband for a growing Idaho community.

As an organization whose mission is to improve broadband access and affordability by introducing true competition to the marketplace, we are fully aware of the proven benefits experienced by the Ammon community as a direct result of the nationally recognized 'Ammon Model.' We support your application to fund a worthwhile project capable of delivering proven results.

Sincerely,
Bruce Patterson

A handwritten signature in blue ink, appearing to read 'B. Patterson'.

Head of Operations
EntryPoint Networks
2565 E 17th Street, Suite #3
Ammon, ID 83406

January 6, 2023

Submitted via electronic mail to broadband@commerce.idaho.gov

Idaho Broadband Advisory Board
Ramon Hobdey-Sanchez
PO Box 83720
Boise, ID 83720-0093

Re: 2023 Idaho Broadband Grant Fund Project Comments

ZiPLY Fiber appreciates the opportunity to provide comment and information to the Idaho Broadband Advisory Board regarding the proposed projects submitted to the Idaho Broadband Fund Request for Proposals. ZiPLY Fiber is an Incumbent Local Exchange Carrier in Idaho. Since acquiring the Frontier Communications infrastructure in 2020, we have invested in network upgrades in Idaho. Our investments in Idaho have delivered fiber to over 60,000 address locations and construction is underway within several Idaho communities.

We have prepared comments on the proposed projects that have a direct impact on areas we serve and have or are currently investing in.

Within the proposed project areas, we are the Incumbent Local Exchange Carrier, which means, we have the most extensive existing network; we are the telephone company that supplies communication (voice, data) services in these areas. Operating a network this expansive means that we don't need to incur costs related to new pathways (i.e. easements and ROW access), manage our network; we operate numerous central offices which are fully powered, secured with generators and with available space for other carriers who want to use our network. The ZiPLY Fiber network is the least expensive to upgrade to serve the un- and under-served because our network already reaches most places. This makes the public dollars go anywhere from 30% to 50% further and creates investments that have a much longer lifespan. Additionally, we operate as a wholesaler of our network and have relationships with more than 130 other carriers in Idaho who have the right to serve over our network anywhere we build, providing immediate competition to the market.

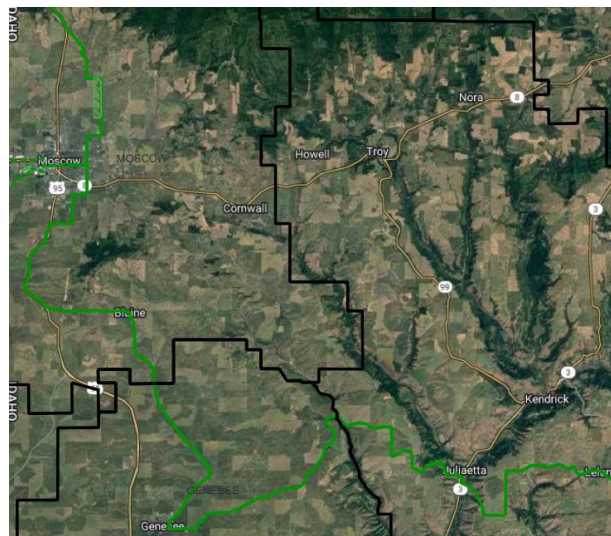
The proposed projects we have identified would result in an overbuild of existing fiber infrastructure. We encourage the Idaho Broadband Advisory Board to fund projects that leverage existing fiber and not those that propose to overbuild existing fiber. We are an interested partner in fiber deployment across Idaho. By working together, we can

enhance middle and last mile service delivery through strategic and wise use of existing infrastructure and taxpayer dollars.

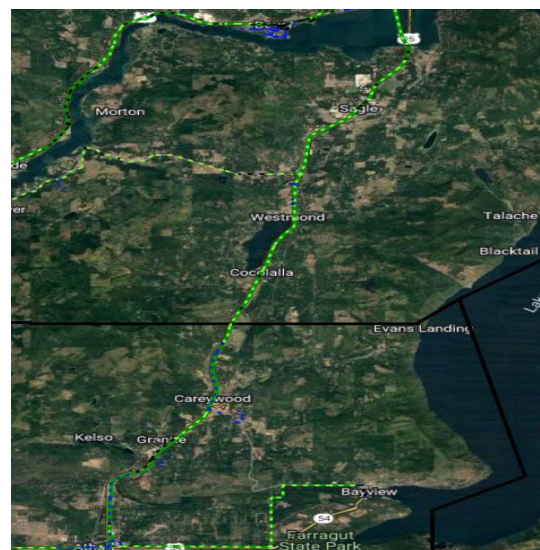
Charter Communications

Charter Communications has proposed to build a fiber network in Latah, Kootenai and Bonner Counties. These counties are covered by exchanges served by Ziplly Fiber, and we have made investments in these counties.

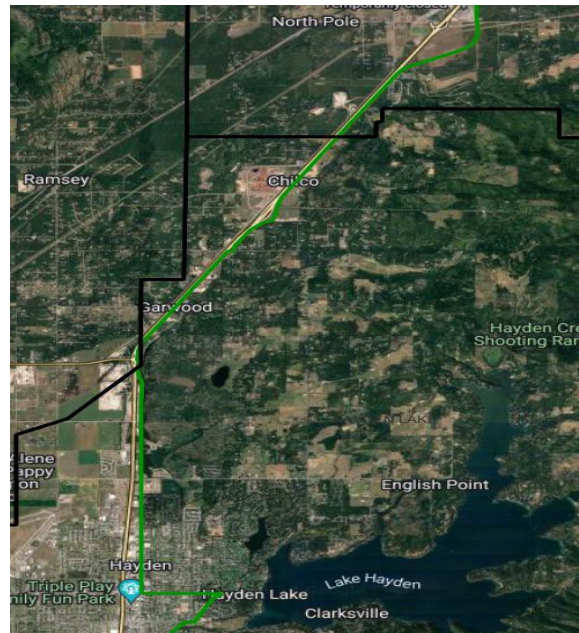
In Latah County, we have constructing Fiber to the Premise in Moscow and Potlatch, and we have upgraded Central Offices with Dense Wave Division Multiplexing systems to enable the backhaul network. Additionally, the Latah County middle mile network is part of two redundant rings, offering the area with network resiliency and route diversity.



In Kootenai County, we have completed fiber buildouts in Coeur d’Alene, north through Hayden Lake and have fiber middle mile infrastructure through the proposed project area.



In Bonner County we have fiber infrastructure along the path proposed. Our investments in Bonner County have been in partnership with the Idaho Broadband Office; Idaho CARES Act funds completed FttP build in rural, unincorporated Bonner County.



In addition to the overbuild of the proposed application, we find it a disservice that the majority of project details have been redacted from the public eye.

Intermax Networks

Intermax Networks has proposed to build middle mile fiber in the area of Bayview west towards Spirit Lake in rural Kootenai County. This project will overbuild Ziplly Fiber's existing fiber backhaul network. Our existing fiber route from Bayview, through Athol to Spirit Lake is part of a network ring system both to the south and north. Customers are currently served by a resilient, diverse fiber middle mile infrastructure along the Intermax Network proposed route.

Idaho Regional Optic Network

Idaho Regional Optic Network proposed fiber middle mile from Star to Grangeville overbuilds 150 miles of Ziplly Fiber middle mile fiber from Riggins to Horseshoe Bend. Ziplly Fiber has proposed to build a north-south middle mile fiber project that leverages our existing fiber infrastructure. The proposed route corridor has many challenges, and we appreciate the opportunity to express our willingness to partner with the State of Idaho and IRON on bridging this middle mile gap.

MiFiber/Core Fiber

MiFiber/Core Fiber proposes to construct a middle mile fiber between Priest River and Newport, WA. This corridor, State Hwy 2 has a Ziplly Fiber backhaul middle mile fiber that currently connects to the Spokane Valley, Wenatchee and is a leg along a north Idaho ring. The proposed fiber build would overbuild an existing transport fiber infrastructure. In Priest River, Ziplly Fiber has built FttP and has two active build blocks to expand FttP in Priest River and in Newport, WA.

Oregon Idaho Utilities

Oregon Idaho Utilities is proposing a fiber build from their facility in Greenleaf to Wilder, Homedale and into the State of Oregon. This proposed project is located within a Ziplly Fiber exchange area. Ziplly Fiber currently has a backhaul middle mile fiber throughout the exchange area and has a FttP construction project under way in Homedale.

Feel free to contact myself, or Chris St Germaine, Local Partnerships Manager in Idaho at 208-400-602 or chris.stgermaine@ziplly.com if you have additional question.

Sincerely,



Jessica Epley
VP - Regulatory & External Affairs

1/5/2023

To whom it concerns,

As a formal rural Superintendent of the Bruneau – Grand View School District, I understand the importance of access to high-speed internet to support the education of our rural Idaho students. Our students in rural Idaho need and deserve equal access to high-speed internet as our education system relies more and more on the use of reliable high-speed internet to support the education programming of our youth.

Idaho teachers across Idaho rely on the resources available through our world wide web: Students without access to reliable high-speed internet often find themselves at a significant disadvantage both during the school day (during classroom instruction) and after hours when researching for their at-home work. All Idaho students need and deserve reliable access to the information available to them via high-speed internet access.

This need for reliable access to high-speed internet was highlighted during the COVID crisis of 2020, when the gap between students with and without reliable access to high speed internet (unfortunately) dictated the level of education they were able to participate in when our schools shut down. This inequity of educational opportunities continues to grow, since 2020, as our teachers and schools streamline their curriculum and research opportunities into web-based platforms, which our students access during school hours and after hours for homework.

I highly encourage and support the Idaho Broadband fund grant through the Idaho Broadband Advisory Board as a means to increase equity for our Idaho students, in the form of access to reliable high-speed internet (both in their schools and in their homes for after-hours research and homework).

Thank you for your consideration,

Ryan Cantrell

Former Superintendent, Bruneau – Grand View School District

Current Chief Deputy Superintendent, Idaho State Department of Education



January 5, 2023

Co-Chair Representative John Vander Woude
Co-Chair Senator Doug Ricks
Idaho Broadband Advisory Board (the “Board”)

Subject: ICBA Comments – Idaho Broadband Fund Grants

Dear Co-Chairs Vander Woude and Ricks:

Thank you for your hard work in helping Idaho develop a strong broadband network, and thanks also to the Idaho Department of Commerce for staffing this work.

First and foremost, The Idaho Cable Broadband Association (“ICBA”) supports the work of the Idaho Broadband Advisory Board (“IBAB” or the “Board”) and the Broadband Strategic Plan developed by the Board. The ICBA believes it critical to Idaho’s educational, commercial and health-care advancement that the digital divide be eliminated. The Broadband Strategic Plan is well suited to work in concert with the federal programs, all of which are designed to provide broadband connectivity to unserved parts of Idaho, to help make broadband more affordable to Idahoans, and to provide devices and digital learning in homes and small businesses across the state.

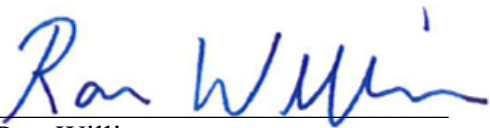
A cursory overview of the hundreds of pages of grant applications appears to show that many of the projects are proposed for areas already and obviously served by broadband of at least 100/20 mps. Some of the proposed areas also have multiple existing ISPs already providing robust broadband service. Many of the same applications are also void or short of a description of existing broadband facilities where the proposed projects are intended. Nor does the state’s RFP provide a challenge process where an existing broadband provider can challenge a proposal that seeks to overbuild an area already served, with a broadband network paid for, in part, by Idaho taxpayers.

Providing an abbreviated but transparent and robust challenge process in this RFP would prevent the potential wasting of state grant funds where adequate broadband facilities already exist, so that the funds are rightfully spent on facilities needed to bring broadband to unserved areas. Not requiring grant applicants to certify or prove that their proposals are in unserved areas, and eliminating a challenge period for the award of state funds, is a significant lack of grant transparency.

January 6, 2023
Co-Chair Representative John Vander Woude
Co-Chair Senator Doug Ricks
Page 2

The ICBA appreciates the Board's desire to begin quickly distributing funds, but believes quick allocations of grants should not be done at the cost of sacrificing transparency and the integrity of the process. Given the one week time frame, in between two holiday weekends, that was designated to submit grant applications for these state funds, and the three day period to review and comment on the 569 pages of submissions, the ICBA is concerned that this particular grant program lacks both transparency and accountability that are otherwise critical to successful state grant programs.

Thank you for the opportunity to provide these comments.

By: 
Ron Williams
ICBA Executive Director
HAWLEY TROXELL ENNIS & HAWLEY, LLP

cc: State Broadband Program Manager, Ramón S. Hobdey-Sánchez

Direct Communications Comments on RFIs & RFPs Submitted to the Idaho Broadband Advisory Board

Contact Information:

Name: Daniel Parrish

Title/Position: Community Development Officer/Legislative Liaison

Email Address: danielp@directcom.com

Phone Number: (208) 406-3503

Direct Communications appreciates the opportunity to comment on the RFIs & RFPs submitted to the Board for consideration. We understand how critical it is to get service to all Idahoans. As the Board is very aware, Idaho did not receive enough funding to close the Digital Divide in our state, therefore it is crucial to award funds to projects that are truly lacking service. The state cannot afford to fund projects that overbuild existing networks.

Direct Communications asks the Board to deny funding for any projects that overbuild an existing Broadband provider's network. Direct Communications provides the following comments regarding the specific applications below.

- **Applicant: Fybercom**
 - Fybercom is wasting precious time and energy of the Board by submitting requests to overbuild current fiber for middle mile projects. We would suggest that the funds be used to build out fiber to areas that are unserved and underserved.
 - Rexburg to Mud Lake to Leadore to Salmon to Carment to North Fork
 - Direct Communications is a provider on part of the route that Fybercom is suggesting funds be used to build out fiber on.
 - There are multiple Middle Mile Providers in Rexburg.
 - Current Broadband Providers Include:
 - Direct Communications, SilverStar Communications, Blackfoot Communications, Cable One, and possibly others.
 - Blackfoot to Pingree to Aberdeen to American Falls:
 - Aberdeen has fiber and the Aberdeen School District has fiber service. There is also a fiber path from Aberdeen to American Falls. This path provides residential, commercial, and carrier services.
 - Within their narrative Fybercom also listed Rockland as an underserved area. With research, Fybercom would have known that the Rockland School District is fiber fed by Direct Communications. In fact, the whole City of Rockland, and many of the surrounding homes have Gig/Gig FTTH. Rockland was one the first towns in Idaho to provide FTTH.
 - Direct Communications is in the process of building out FTTH through a partnership with the City of American Falls, the American Falls School District has already been using fiber for several years.

- **Applicant: City of Ammon**
 - Multiple fiber providers in the city of Ammon.
 - Direct Communications has fiber service in Ammon and provides services independent of the City of Ammon.

- **Applicant: City of Rexburg/Madison County**
 - Direct Communications is the largest fiber provider in the Rexburg area.
 - Direct Communications has fiber throughout Rexburg.
 - Multiple Fiber Providers in Rexburg already (Direct Communications, Sparklight, Lumen, Silver Star, and Blackfoot Communications).
 - Multiple Middle Mile Providers exist throughout the area as well.

- **Applicant: Idaho Falls Fiber**
 - Direct Communications has fiber service in Idaho Falls and provides services independent of the Idaho Falls Fiber network.
 - Multiple fiber providers in the city of Idaho Falls.

- **Applicant: Silver Star Communications**
 - Direct Communications has fiber in Bonneville, Jefferson, & Madison Counties. We would ask that projects not be funded to overbuild areas where we have existing fiber. Specifically, Blackfoot, Shelley, Firth, Idaho Falls, Ammon, Rigby, Hibbard, or Rexburg.

- **Applicant: Ziplly Fiber**
 - Ziplly's Fiber's identification of unserved & underserved addresses is so vague as to make it nearly impossible to understand exactly what they are proposing to service.
 - Bingham County was listed by Ziplly Fiber as a last mile project. Direct Communications has fiber in Aberdeen, Blackfoot, and many of the routes surrounding these locations.
 - Ziplly Fiber states in their application that they have identified areas where they can afford to provide a 25% match. However, Ziplly's own "project costs and sources" spreadsheet only identifies a 20% match.

We thank the Board for the opportunity to provide comments. It would be helpful to have more information regarding the specific proposed builds. Commenters could then focus on whether funding would support middle mile fiber overbuilds.

We implore the board to focus these funds on areas that truly lack access and avoid distribution of funds to any project that overbuilds existing networks. With limited financial resources

available to close the digital divide the state cannot afford to allocate dollars to areas that already have service as this will further deepen the digital divide that we are all working so hard to close.

January 6, 2023

Via E-Mail: broadband@commerce.idaho.gov

Idaho Broadband Advisory Board
Attn: Ramón S. Hobdey-Sánchez, J.D.
State Broadband Program Manager
Idaho Department of Commerce
700 W. State Street
Boise, Idaho 83702

Re: *Idaho Broadband Fund –Applications, January 2, 2023*

Dear Mr. Hobdey-Sánchez:

Spectrum Pacific West, LLC (“Spectrum”) submits these comments (“Letter”) in response to the Idaho Broadband Advisory Board’s (“Board”) Notice of Broadband Funding dated December 22, 2022 (“Notice”), that prioritizes “projects that focus on expanding or extending middle mile, are shovel ready, and have a significant financial match.”

Spectrum shares the Board’s goal “to prepare citizens, businesses, and all Idaho communities to be able to compete for jobs in the next twenty to thirty years” by striving to achieve 100% broadband access by 2027.¹ However, for the reasons detailed in this Letter, the Applications identified in Appendix A should be denied or modified to prevent inefficient use of finite taxpayer-supported funding. To the extent an Application is not denied in its entirety, we ask the Board to modify the Applications to remove locations already served by Spectrum from funding eligibility.

The Applications listed in Appendix A to this Letter should be denied because they fail to meet the State’s Strategic Broadband Plan’s (“Broadband Plan”) goals or implementing statute to the extent they seek funding in areas already served by Spectrum’s high speed broadband. With regard to funding infrastructure projects, the Legislature tasked the Board with creating a statewide broadband plan that will disperse grants from the Idaho broadband fund to “areas of the state that are most in need...”² In keeping with its statutory mandate, the Board created a Broadband Plan that has the express objective of prioritizing “middle mile *and* last mile infrastructure investments to connect residents, businesses, and community anchor institutions that are unserved and underserved in the State of Idaho.”³ (Emphasis added). The Broadband Plan defines “unserved” as “an area that lacks

¹ *Idaho Strategic Broadband Plan 2022-2027* at 4.

² Idaho Statute 67-4761(2).

³ Broadband Plan at 11. We note that the Notice appears to omit any prioritization of “last mile infrastructure” projects. It is unclear whether the omission of “last mile” was inadvertent but to the extent such omission was intentional, failure to prioritize last mile projects appears to conflict with the plain language of the Broadband Plan and the intent of the Idaho Broadband Act and the Advisory Board’s Plan.

access to broadband infrastructure speeds of 10 Mbps download and 1 Mbps upload” and “underserved” as “an area that lacks access to broadband infrastructure speeds of 25 Mbps download and 3 Mbps upload.”⁴


All of the Applications listed in Appendix A contain locations that overlap with Spectrum’s existing high speed wireline broadband offerings. Specifically, Spectrum offers reliable wireline broadband service to residential customers at speeds of up to 1 Gbps (1000/35 Mbps upload/download), which by far exceeds the threshold for an unserved and underserved area. Thus, an area that is already served - particularly an area with service capable of speeds up to 1 Gbps - already meets and exceeds the Broadband Plan’s objectives and statutory goals.

As highlighted above, the Board’s statutory mandate is very clear - funding should be targeted to projects “most in need” and therefore to unserved and underserved areas as the Board’s Broadband Plan requires. Using taxpayer funding to overbuild existing broadband services would do nothing to close the digital divide in unserved and underserved areas as the Broadband Plan intends.

Spectrum strongly encourages the Board to protect taxpayer funds by denying the attached Applications in their entirety, or by modifying them to remove any served locations. Spectrum is pleased to work with the Board on an expedited timeline to ensure the limited, taxpayer funds are concentrated on truly unserved and underserved areas and do not overlap with Spectrum’s existing 1 Gigabit-capable service. Protecting the funds for unserved and underserved areas will ensure that Idahoan’s investment is most efficiently and effectively utilized by reaching those most in need.

Ultimately, Spectrum desires an opportunity to partner with the Board and policymakers in a meaningful way to meet our shared objective of reducing the digital divide for all Idahoans. We look forward to engaging with the Board regarding the information in this Letter and to bringing our considerable experience to the table to enable all Idahoans to participate in the vast educational, economic, and social opportunities that a high speed broadband connection can bring.

Respectfully submitted,



Stafford G. Strong
Senior Manager, State Government Affairs – Washington and Idaho

⁴ Plan at 5.

Appendix A

Spectrum's Supplemental Information to Idaho Broadband Fund – Applications, January 2, 2023, Comments.

Applications that Contain Locations that Overbuild Spectrum's Existing Network: *

Intermax Networks: Part of this Application aims to provide wired last mile connections to areas west of Bayview in Kootenai County. Spectrum already offers broadband service to areas in this Application including over 600 passings at Gigabit speeds, well above the minimum unserved/underserved standards established by the State. Even with the limited detail provided by the Applicant, Spectrum's review of the area shows that there is substantial overlap.

Port of Lewiston: The Port's middle mile project proposes to lay fiber from Moscow to Lewiston and then from Lewiston to Grangeville. Spectrum already offers broadband service throughout Moscow, and this middle project has the potential to unnecessarily seek funding in an area where Spectrum currently connects over 12,000 passings at Gigabit speeds, well above the minimum unserved/underserved standards established by the State. Even with limited detail provided by the Applicant, due to Spectrum's significant deployment in Moscow and our internal review based on available data shows that the proposed project would cover large portions of Spectrum's existing service area. There simply is no need for any additional middle mile facilities in Moscow given Spectrum's existing service territory. While we believe middle mile funding absent a last mile component is inconsistent with the Broadband Plan and would not close the digital divide. If the Board funds this project, it should condition such funding on ensuring that the funded middle mile cannot be used by Applicant or by any ISPs connecting to Applicant from serving areas already served by Spectrum.

Coeur d'Alene Reservation: This application aims to provide wired last mile connections to unserved and underserved areas on the Coeur d'Alene Reservation. Spectrum already offers broadband service in parts of the application area to over 500 passings at Gigabit speeds well above the minimum unserved/underserved standards established by the State. Even with limited detail provided by the applicant, a review of the FCC recently released broadband map verifies that Spectrum has broadband service in areas that are part of this application.

*Please refer to the FCC's recently released broadband map and Spectrum's 477 FCC filings for further verification that Spectrum provides service in areas where applicants are unnecessarily seeking state funding. The FCC's map is located at broadbandmap.fcc.gov. Further, Spectrum reserves the ability to supplement this appendix with additional mapping, particularly if applicants are able to provide Spectrum with more detail (in a non-PDF format) of the specific areas they intend to build as part of their grant applications.



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PATRICK.CARON@CABLEONE.BIZ

PATRICK N. CARON
ASSISTANT GENERAL COUNSEL

Delivery by Email only: broadband@commerce.idaho.gov

January 6, 2023

Idaho Broadband Advisory Board
Attn: Ramón S. Hobdey-Sánchez, J.D.
State Broadband Program Manager
Idaho Department of Commerce
700 W. State Street
Boise, Idaho 83702

Re: Idaho Broadband Fund – Cable One, Inc. Public Comments: Middle Mile Applications

Dear Ramón:

Cable One, Inc. (d.b.a. Sparklight) offers the following public comments to proposals received by the Board relative to the Idaho Broadband Fund grant round which closed on Monday, January 2, 2023. Because the Board has allowed only forty-eight hours to provide comments to proposals spanning nearly 570 pages, our comments will be necessarily general, non-technical, and brief. If the Board requires further and more substantive information related to our comments, we will promptly respond to any inquiries.

Cable One offers the following comments regarding these identified project proposals:

- 1) The City of Ammon, Idaho (p. 67-87).

Cable One encourages the Board to deny support for the City of Ammon’s funding request for middle mile projects in two local improvement districts where it seeks to provide last mile service to “an additional 2400 homes.” No identification of the location of these “homes” is provided, nor is there any representation that the end user homes Ammon seeks to connect are un/underserved locations. Cable One provides Gig speed services to residents in Ammon already. Because the City seeks middle mile funding for the express purpose of providing end-user connectivity to undisclosed locations which may already be receiving qualifying service from Cable One or another provider, we must encourage the Board to deny this funding request.

- 2) City of St. Anthony/Entry Points Network (p. 88-100):

Cable One encourages the Board to deny support for the City of St. Anthony’s funding request for ostensibly middle mile construction. In reality, it appears the City seeks funding to complete a fiber ring to serve 21 municipal locations and not to provide common middle mile connectivity. Further the City notes that its proposed project “has the potential to improve service levels, customer choice, and costs for retail broadband services for

over 1,200 area properties, both residential and commercial.” However, improving service levels, customer choice and costs are not included in the project eligibility criteria established by the Board for this round of funding. Rather, eligible proposal are those that expand middle or last mile connectivity “to unserved and underserved areas.” Here, the City provides no information about whether the 1200 “properties” are already receiving qualifying services. Because the City has not established that it seeks the requested funding to establish middle mile connectivity, seeks the funding to address purposes that are not included in the eligibility criteria for this funding, and has not identified the 1200 “properties” or established that any of them are unserved or underserved locations, we encourage the Board to deny this funding request.

3) Farmers Mutual Telephone Company (p. 165-176):

Cable One encourages the Board to deny support for Farmer’s Mutual Telephone Company’s middle mile funding request. Here, the applicant advises that the segment it seeks to construct between Payette and Fruitland will create redundancy to services it provides in Payette. It also claims that the proposed middle mile segment will pass 110 locations where it believes 40% (44 locations) are underserved. Thus the applicant seeks a grant amount of \$835,800, or slightly under \$19,000/per for 44 passings. Because this proposal seeks to create a redundant route for its own purposes and includes a small number of extremely high cost passings to end-user customers we encourage the Board to deny this funding request.

4) Fatbeam: Middle Mile Build New Plymouth to Emmett (p. 180-187).

Cable One supports this proposal to create additional backbone capacity between these rural locations and encourages the Board to grant this funding request. We commend the applicant’s compliance with the Board’s Strategic Plan Open Access requirement by reserving strands available on 20-year IRU terms to providers seeking redundant routes or serving end use customers in Payette or Gem Counties.

Cable One has no comment regarding the remainder of Fatbeam’s proposal to provide ftp services to end user locations in Elmore County, except to object and encourage the Board to deny this request if and to the extent those ftp services affect locations where Cable One presently provides qualifying broadband services to customers in Elmore County.

5) Oregon Idaho Utilities (p. 437-438)

Cable One encourages the Board to deny support for Oregon Idaho Utilities’ middle mile funding request seeking to construct a segment connecting Greenleaf, via Wilder and Homedale, to the Oregon Border. The applicant states its intended purpose is to deliver fiber to the premise “to all residential and commercial structures” in Wilder and Homedale. Further, without providing any evidence in support the applicant states “[b]oth of these communities are underserved for high-speed broadband services.” Cable One presently provides high-speed broadband services to these communities with speeds up to 1 Gbps. Because the applicant seeks middle mile funding to provide last mile services to locations already receiving qualifying speeds, we encourage the Board to deny applicant’s funding request.

6) Ziply Fiber: Connecting Idaho-Phase 2, Riggins to Orofino (p. 557-564).

Cable One supports this high-cost proposal to strengthen backhaul communications infrastructure connecting north and south Idaho and encourages the Board to approve this funding request. We concur that the proposed middle mile connectivity will provide opportunities for redundancy and the provision of last mile services to un and underserved locations adjacent to this path.

Cable One objects to Phase 1 of Ziplly Fiber’s proposal connecting Boise and Horseshoe Bend. Cable One has already constructed fiber facilities along this exact route. Because we believe providing support to overbuild our existing facilities is a wasteful use of limited public resources we encourage the Board to deny this request. Cable One currently has excess capacity on this segment and has already reached out to Ziplly to discuss interconnection and an IRU to provide fiber capacity in this location.

Cable One has no comment regarding the remainder of Ziplly Fiber’s proposal to provide ftp services to end user locations throughout Idaho, except to object and encourage the Board to deny this request if and to the extent those ftp services affect locations where Cable One presently provides qualifying services to customers.

7) Ada County/City of Boise (p. 568-569)

Cable One encourages the Board to deny support for the middle mile funding request submitted by Ada County/City of Boise. The stated purpose of the applicants’ funding request is to “promote competition and enable a wider range of affordable last-mile service offerings throughout the County...”. The applicants here gravely misunderstand the purpose of the present funding opportunity which is to expand middle or last mile connectivity “to unserved and underserved areas” and manifestly not to “promote competition” in areas where qualifying service already exists. Cable One strongly encourages the Board to deny this funding request and to further clarify that the purpose of the limited support available to aid infrastructure projects is to create connectivity in unserved and underserved locations, and not to artificially stimulate broadband competition in places where qualifying broadband service already exists.

We thank the Board for the opportunity to share the foregoing comments. We are ready to provide further relevant information at the Board’s request.

Sincerely,

CABLE ONE, INC.



Patrick Caron
Assistant General Counsel

copy: Matt DeMuro
Teresa Whorton
Cheryl Goettsche
Chris Boone
Peter Witty

JOINT SCHOOL DISTRICT No. 365

BRUNEAU – GRAND VIEW
Rivrock Jr. Sr. High



January 4, 2023

I am new to Owyhee County this year as the Superintendent of the Bruneau Grand View School District. Most of my background in education has been in larger densely populated, urban communities with a host of broadband support services. Services available and offered both within the district and within the community. In terms of internet providers in larger populated communities, there is usually a menu of providers competing for students and families to choose their services and products at competitive prices. In my past administrative experience I didn't even consider limited or unreliable internet access as an educational issue for kids when they left school. We purchased curriculum and planned lessons based on the assumption homework resources would be available and that every student would have internet access at home.

The Bruneau Grand View School District is a remote rural school district in a low socio-economic area. Although we have internet access provided by the State as a public school, when our students leave school their internet access at home is often slow, limited, unreliable, and in many cases non-existent. During the COVID pandemic this issue came front and center as all schools in Idaho were closed for a period of time and educators were expected to continue to deliver instruction remotely. We found a good portion of our student population were not able to afford internet service even when it was available.

One of the things our district has done recently is to make our internet access available from our parking lot as well as our front foyer area. We keep the outer doors of the Jr./Sr. High open for anyone who would like to come sit in the front foyer during after school hours in order to access the internet. Although limited, it is what we can do to give access options to our community.

In reading the mission of Imagine Idaho, "To educate, coalesce and leverage community leadership throughout the state to deploy significant federal and state funding for broadband-communications infrastructure in a pro-competitive way to serve and underserved Idaho." That sounds like a mission statement that has places like Bruneau, Grand View, Oreana, and Murphy, Idaho in their sights.

We would be very interested in getting behind a mission that includes strategic deployment of federal and state funding in a pro-competitive way and that is committed to helping communities like ours to grow and thrive in the 21st century.

Sincerely,
Jeff Blaser, Superintendent



231 W Main Street
Grangeville ID 83530
208-494-4343

January 6, 2023

RE: Support Letter – IRON, Port of Lewiston, DIGBY II

We do not envy the Idaho Broadband Advisory Board member's Herculean task of having to allocate roughly \$35 million between numerous deserving projects throughout the State of Idaho. Getting this right will surely require the wisdom of Solomon.

This support letter is unique in that it will be the only support letter in favor of not just one project, but 3 projects combined together as a whole. There are synergies and economies of scale that make the sum a magnitude more beneficial than the parts alone. If your intent is to build a highway between Boise and Twin Falls, you don't build it to Mountain Home and stop. You go all the way. As nice as a 2-lane highway is between Boise and Mountain Home, or Twin Falls and Mountain Home, nobody wants to get to Mountain Home with the prospect of having to take washed out dirt roads the rest of the way. Leaving the project unfinished for practical purposes renders the part of the project that is completed significantly less useful, especially considering the cost involved in building out the part of the project that was completed.

We believe our support of the IRON project, the Port of Lewiston project, and the DIGBY II project as if it were a single project is quite compelling for the following three reasons:

Building out these three projects as if they are a single project is compelling because once completed, for the first time, the Northern part of the State will be directly connected to the Southern part of the state. In short, this is the only project that is NOT regional in nature. These three projects combined together as one will be the only project that will have Statewide implications and benefits. Some might suggest that the landmass through which these 3 projects will traverse only contains a population base of approximately 150,000 (8%). But that is missing the point. These three projects when correctly viewed as a Statewide project actually benefits either directly or indirectly a population of 1,900,923 (100%). Admittedly it is going to be very difficult to figure out how to allocate \$35 million among so many deserving projects in a way that benefits all constituencies Statewide. These three projects combined together fit that bill and that reality.

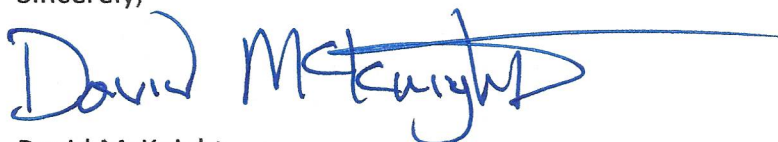
Building out these three projects as if they are a single project is compelling because for the first time, the most economically challenged part of the State will have the infrastructure necessary to realize an economic boom. Lack of affordable and reliable broadband internet is

without a doubt holding back the area between Boise to Moscow. If this area were to have the requisite infrastructure to enable an economic revolution, the positive implications would be enviable. In sum, the net increase in taxes extracted from this region of the State on a State level would be of a greater magnitude than any other project being considered. That reality should be appreciated and not missed.

Building out these three projects as if they are a single project is compelling because with affordable middle mile, small communities in this rural part of the State will finally have access to quality internet at an affordable price. Let's not kid ourselves, the rural nature of this part of the State makes the probably of last mile fiber builds to even a small percentage of the population a hard lift when economics are factored in, even if the broadband advisory board where to fund 100% of the cost of the buildout. Wireless internet shines in this type of landscape, and it is capable of speeds of not only 100 Mbps / 20 Mbps, but in areas where millimeter wavelength makes sense, of speeds around 1000 Mbps / 1000 Mbps. The single biggest obstacle preventing wireless providers like us from building out wireless infrastructure in these areas - even if it is 100% on our own dime - is the lack of affordable middle mile fiber. We cover an area where there is zero middle mile competition. We typically pay \$5000+ for a 10 GB connection. We have even been quoted \$2500 for 500 Mbps (**that is equivalent to \$50,000 for 10 GB**)! That's nuts! It is obscene! It doesn't matter if the middle mile is 4 miles, 20 miles, 40 miles ... it is always around \$5000+. Yes, entitles might say they are "open access." But if they price it such that it is unaffordable, we are not so sure they are as "open access" as they might pretend to be. Proclaiming one is "open access" is all nice and dandy when one is appearing before the broadband advisory board in an effort to secure free money (who wouldn't be motivated to do so?), but what should really matter to the broadband advisory board is if entities actually follow through with being "open access" in practice (**demanding \$50,000 for 10 GB most definitely is NOT "open access"**). There is a saying in Texas that when people talk the talk but don't walk the walk they are "all hat and no cattle." As the broadband advisory board allocates the \$35 million dollars before it, and as it continues to allocate even greater sums of money in the future, it is imperative that the broadband advisory board develops a mechanism to ensure that when folks say they are "open access," that there are indeed cattle behind the hat.

As demonstrated, supporting projects is not always about the need, but when weighed out, it is about the greatest benefit to the State as a whole. All projects submitted will undoubtedly address severe needs throughout the State. That is not disputed. With so few dollars to address the never-ending needs, it seems that viewing the situation from a standpoint of what brings the greatest benefit to the entire State as a whole is a worthy measuring stick.

Sincerely,



David McKnight

AirBridge Broadband | CEO