

Idaho Broadband Advisory Board
Idaho Broadband Capital Projects Fund
Executive Summary Public Comments
Open December 27, 2022 through January 11, 2023

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

January 11, 2023

RE: Middle Mile “Open Access” | Broadband Impact Zones

Lack of affordable middle mile fiber is one of the key drivers preventing unserved and underserved residents in Idaho from obtaining broadband internet.

In many instances, middle mile fiber is already in place, it is just priced so egregiously and anticompetitively that a business model does not exist to leverage it to serve the last mile.

When it comes to middle mile fiber in Idaho, there are ultimately two pricing schedules:

- **Metro** - *where middle mile competition exists* - one can expect to pay ~\$1,000 a month for a 10 GB connection
- **Rural** - *where middle mile competition is lacking* - one can expect to pay between \$5,000 - \$10,000 a month for a 10 GB connection

We typically pay \$5,000+ a month for our 10 GB middle mile fiber, but we have also received quotes that equate to roughly \$50,000 a month for a 10 GB connection.

Residents that we would have otherwise served on our own dime continue to remain unserved or underserved due to this reality.

To remedy this market inefficiency, we recommend the broadband advisory board take the following three actions:

(1) Define “Broadband Impact Zones”

All areas in the State of Idaho that lack middle mile competition should be grouped into a “Broadband Impact Zone.”

(2) Define “Open Access” with a tangible pricing structure

“Open Access” will apply to all “Broadband Impact Zones” where middle mile competition is absent and will be defined as the lesser of the (1) average middle mile cost that a given ISP

charges for an equivalent connection in a metro market where competition is present, or (2) the Port of Whitman pricing model.

(3) Require MOU's of all ISPs prior to applying for all future grant funding

To be eligible for the \$500 million in future grant funding, ISPs must agree to the following terms:

- Provide a comprehensive list of all middle mile assets in their control that can be utilized by other ISPs to expand broadband coverage in Idaho.
- Agree to abide by the definition of “open access” within “Broadband Impact Zones” as defined by the broadband advisory board.

By implementing these changes, it will allow individual ISPs to weigh out the costs and benefits of signing an MOU with the State to be “open access” in order to be eligible for a portion of the \$500 million in future grant funding. It should be noted that no ISP will be required to participate in this opportunity if they choose not to.

We invite the broadband advisory board to add this topic to the next board meeting so that it can be explored in more depth. Perhaps the board will want to invite representative / stakeholders from both sides of the issue to solicit feedback, ideas, and to answer questions.

It is our belief that significant good will come to the State of Idaho if this market inefficiency can be resolved prior to additional grant funding being dispersed.

This is the single action the broadband advisory board can take to dramatically alter how many unserved and underserved residents receive broadband internet in the upcoming years that doesn't cost the taxpayer, the State of Idaho, or the broadband advisory board one additional red cent.

Sincerely,

David McKnight
AirBridge Broadband | CEO



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

January 11, 2023

RE: Matching Funds Requirement | Affordability

Fiber and wireless internet deployments are both valid options depending upon the circumstances, especially in rural areas of the state where unserved and underserved populations dominate (*the original focus of grant funding*).

Ultimately, these two technologies don't really compete since wireless fills a niche role in reaching locations that fiber can't reach economically, even with a huge inflow of grant funding.

If wireless technologies were to be excluded from grant funding, the hardest to reach unserved and underserved residents will remain with subpar internet for years to come.

For the vast majority of the State of Idaho, fiber deployment will be the right choice and we would expect that most of the funding to go this direction.

However, there are many rural areas where wireless fills a unique role that cannot be filled any other way.

Since most wireless providers are very small, the final requirements imposed by the broadband advisory board should not be overly onerous as to effectively preclude them from participating and becoming part of the solution.

The Matching Funds Requirement and Affordability sections of the draft document both merit further discussion to ensure they don't unwittingly become a roadblock to wireless deployment where fiber is not feasible.

(1) Matching Funds Requirement

We agree that there is a lot of merit in requiring matching funds for large projects. For one, it helps to stretch limited grant dollars, so more people are covered.

Having said that, requiring matching funds has the unintended effect of eliminating most wireless providers from participating in the grant program.

In short, most wireless providers are smaller entities that do not have access to the capital like the larger fiber providers do.

To remedy this reality, we would suggest the broadband advisory board do a carve out for small wireless providers who apply for grants of \$2 million or less. In these scenarios, we would recommend that the matching requirement be waived so that broadband infrastructure can be built out to those who fiber cannot reach.

(2) Affordability

We feel the line that reads “Projects will need to provide evidence that customers in project areas are able to access and purchase broadband at 100/20 Mbps for less than \$50 a month as well as participate in the ACP” is somewhat redundant.

The fact that all entities must participate in ACP to be eligible for grant funding should be sufficient. This alone should be the mechanism that ensures residents are able to get broadband at an affordable rate.

It should also be noted that fiber providers can easily offer 100 Mbps / 20 Mbps plans for less than \$50 because that is their bottom tier plans, and they can easily charge \$70 to \$100 for plans up to 1000 Mbps / 1000 Mbps.

Wireless providers do not have the luxury of offering higher speed plans at different prices as the state of the technology caps out at around 100 Mbps in rural markets where fiber is not cost effective.

Sincerely,

David McKnight
AirBridge Broadband | CEO

January 11, 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: Capital Projects Fund grant guidelines

Dear Mr. Hobdey-Sánchez:

Spectrum Pacific West, LLC (“Spectrum”) submits these comments in response to the Idaho Broadband Advisory Board’s (“Board”) Notice of Public Comment Period on Capital Projects Fund (CPF) grant guidelines dated December 27, 2022 (“Notice”). The Board’s “ARPA Capital Projects Fund Summary” dated December 12, 2022 (“Summary”) outlines draft guidelines for the program to inform public comment necessary to develop rules “designed to outline, implement and audit the deployment of Capital Projects Fund (CPF) monies from the US Department of the Treasury (US Treasury) for the State of Idaho”.

Spectrum strongly supports the Summary’s recognition that this grant funding is aimed to advance broadband infrastructure deployment to places that lack access to 25/3Mbps (unserved) and 100/20Mbps (underserved) service. Spectrum additionally supports many of the policies outlined in the Board’s Summary, such as the inclusion of a robust challenge process and a matching fund requirement as proposed in this letter. However, in order to ensure broad participation in the program, Spectrum strongly recommends that the Board revise any requirements that result in the regulation of broadband prices, or otherwise limit participation in the program to the detriment of Idahoans most in need of broadband service.

The following comments outline recommendations to improve the rules and help maximize private sector participation. Spectrum’s recommendations follow the Summary’s outline and format. We look forward to reviewing the draft rules following their release and request the opportunity to submit comments at the appropriate time on them.

Funding Availability for FY2023/24 and Matching Funds Requirement

“Priority consideration may be given to projects that leverage greater amounts of funding for a project from other private and public sources. The maximum individual grant amount is \$XX million. The maximum grant funding award cannot exceed XX% of the eligible total project costs.” And, “Idaho’s CPF Grant Program may pay up to 0-100% of the total costs for a qualifying project. To obtain a broadband grant, the applicant must provide the funding, not covered by the grant, with matching funds...”

Applicant financial contributions or funding matches are important criteria that should be a part of any scoring system. Matching funds (a) help assure allocation of limited public funds to more cost-efficient and well-supported projects, and (b) mean that the applicant has “skin in the game” and is committed to ensuring the long-term success of its investment. Requiring some private sector investment should be a threshold criteria. A minimum of 10% is reasonable for most broadband build out projects. In certain very low-density projects where the cost per passing may exceed \$25,000 per home, the State should consider a waiver of the 10% requirement and instead apply a priority for the applicant that offers the greatest degree of matching funds on a per passing basis. Beyond the threshold criteria of 10%, the State should award a higher number of points for providers that offer the greatest percentage of matching support. Matching support should be one of the most important review criterion and greater points should go to applicants that offer a higher percentage of private investment. The amount of points awarded should be on a sliding scale either in ranges, *i.e.* 20-25% equals X points, 25-30% equals Y points, etc., or as suggested with the number of points correlating to the percent match, *i.e.* 25% match gets 25 points, 30% match gets 30 points, etc.

Spectrum does not recommend setting a maximum grant award amount for project applications. However, if a maximum grant award is set, it should be in the \$30 million range in order to accommodate the highly rural and expensive nature of projects necessary to connect unserved and underserved households and businesses in the State.

Eligible Applicants:

“Entities that are eligible to submit proposals are limited to: Idaho nonprofit organizations; limited liability companies; cooperative entities; Idaho local or tribal governments; broadband service providers that are incorporated businesses or partnerships; State of Idaho agencies and political subdivisions.”

Spectrum supports this grant language because it allows a broad array of providers to apply for funds. Grant programs should be focused on how to get high speed broadband to unserved and underserved homes and businesses. Allowing various types of providers to participate gives the

State more options in choosing award winners. The program should not favor or disfavor any provider or organization simply because of its organizational structure or type. Rather, it should encourage participation by, and award scoring points to, entities with demonstrated financial and technical ability and the experience required to rapidly expand and sustain broadband connectivity to Idaho's unserved and underserved communities.

Eligible Areas:

“Project areas are any underserved or unserved areas without access to wireline delivery of 100/20Mbps and must deliver to the location, as well as exclude areas that have received state or federal funds that deliver or will deliver wireline speeds of 100/20Mbps.

Projects must demonstrate why the communities have identified this project as a critical need as it relates to access, affordability, reliability, and/or consistency and must address telehealth/health monitoring, distance learning and remote work.

As well as following CPF guidelines, the State of Idaho's guidelines will rank projects based on the Idaho Broadband Advisory Board's Strategic Plan which prioritizes projects that address broadband infrastructure gaps where there is a higher number of students and teachers without access to broadband, address gaps in public safety, provides greater economic opportunities for businesses, farms, ranches, and other rural businesses. Finally, the State will analyze projects based on locations served and cost of build.”

Excluding areas that have already received State or federal funding to deliver wireline speeds of 100/20 Mbps is critical to preventing duplication and wasteful spending of taxpayer dollars. This important exclusion additionally protects prior grant funds that benefit Idahoans. Unnecessary duplication of other broadband investment programs exacerbates the digital divide and could further isolate rural areas by diverting limited funds away from places with existing need.

Spectrum understands that unserved or underserved areas with higher concentrations of students and teachers, or areas with entities of strategic importance to the region's economy, may be prioritized in grant funding decisions. If the Board determines to utilize such a criteria, Spectrum recommends the Board identify these areas of strategic importance in advance of a grant program.

There are many worthy projects that serve households and businesses in rural communities that will never be served unless the hardest to reach locations are also prioritized in grant programs such as this. These myriad factors should be analyzed in conjunction with the State's analysis of locations and cost of build.

Affordability:

“Projects will need to address affordability in their project applications. Projects must offer an affordable broadband plan and participate in the FCC’s Affordable Connectivity Program (ACP); which is a \$30 monthly rebate as of January 2022. Projects will need to provide evidence that customers in project areas are able to access and purchase broadband at 100/20Mbps for less than \$50 a month as well as participate in the ACP.”

Spectrum does not object to the need for the applicant to address its affordability plans in its proposal. We already participate in the Affordable Connectivity Program (ACP) and were recently included in a national announcement from the Biden Administration lauding the efforts of Spectrum and other companies participating in the program.¹ Requiring continued participation in the current ACP program - provided it is not substantially changed in terms of eligibility, reimbursement and other material elements of the program - makes sense and Spectrum supports those recommendations. However, making a one-size-fits-all approach to require a specific speed (100/20 Mbps) and a price cap of \$50 without regard to future broadband developments would not benefit Idaho consumers. For example, Spectrum currently offers non-ACP eligible customers a minimum speed service tier of 300/10 Mbps, which is much faster than the speed contemplated in the Summary, but at a higher non-promotional rate than \$50. Our service offers additional features such as no contracts, hidden fees or data caps. Forcing applicants to offer slower speed service may result in a less favorable circumstance for customers than current offerings elsewhere in the State, and unnecessarily interfere with national companies like Spectrum, who market uniform pricing and services across the country.

Idaho should not regulate broadband pricing and speeds. Requiring a broadband plan at 100/20 Mbps speeds to be made available to all customers and at a rate-regulated price without any future pricing and speed adjustments will not serve the long-term interests of our customers, and effectively codifies into law a singular approach to addressing affordability, forever. Instead of establishing conditions that prevent flexibility to respond to market conditions now and into the future, the Board would be better served by requiring applicants to disclose their affordability plans and evaluate those responses as part of the selection criteria. For example, if the Board believes each operator should have a minimum 100/20 service in proposed project areas, it can assign a preference or additional scoring points for such commitment and evaluate operator’s proposals against others vying for the same project areas. This will ensure more robust participation in the program *and* flexible approaches that do not lock applicants into only one way of doing things, thereby better serving the interests of consumers.

¹ Remarks By President Biden on the Affordable Connectivity Program, The White House, whitehouse.gov, May 9, 2022, accessed on January 11, 2023.



Additionally, broadband expansion grant programs should focus on making broadband available. The Board should help make broadband available to every currently unserved and underserved household in the State. A competitive grant process that is laser-focused on connecting the unserved and underserved will best achieve the State's goals.

Participation in ACP already comes with the benefit of a \$30 discount on internet service for eligible customers (\$75 in tribal areas). Spectrum currently makes the ACP credit available to offset the cost of any of Spectrum's broadband products for qualifying customers. Spectrum offers its Spectrum Internet 100, a high-speed, low-cost broadband service with 100/10 Mbps speeds available to households qualifying for ACP. Eligible new households can get Spectrum Internet 100 for just \$29.99 per month, which includes a modem, in-home WiFi and self-installation at no additional charge. With the ACP credit, eligible customers can receive Spectrum Internet 100 at no monthly cost. Spectrum also offers a low-cost broadband service to low-income students and seniors through our Spectrum Internet Assist ("SIA") program. SIA provides high-speed broadband (30Mbps/4Mbps) at a rate of under \$20 per month (plus \$5 per month for in home Wi-Fi service) to qualifying households.

Community Engagement/Open, Public Comment Period:

"For CPF grant applications, additional points will be awarded in the scoring rubric for applications that show significant support from the community and partnerships."

Recognizing the importance of managing grant funds prudently so that the greatest number of unserved and underserved locations can be served, Charter agrees it is appropriate that community support for the application in the project area be a criteria that is considered in reviewing broadband grant applications.

Application Window and Deadlines:

"The official grant portal and application is expected to open in early to mid-spring 2023. The grant application period will be open for XX weeks."

The grant period should remain open for at least forty-five to sixty days to give providers adequate time to review the program rules and to develop projects based on the parameters and requirements of the grant program. Such application window still accommodates the State's preferred timeline to allocate funding by early to mid-summer 2023.

Challenge:

“Upon the closing of the CPF grant application window, there will be an open challenge period that will run for XX business days and/or XX weeks.”

To avoid grant funds from being used to build to areas that already have broadband, the grant program should include a robust challenge process that allows providers to advise when public funds are being directed to areas that another provider (a) already serves; or (b) has commenced construction to provide broadband service to the area; or (c) was awarded funding for the area through a state or federal broadband grant program. An application should be denied if any of the above criteria exist. A robust challenge process includes making all portions of applicants’ project location information publicly available, with notice to current broadband providers. Broadband providers should have a minimum of forty-five days to respond to the application and provide relevant data and information to support its challenge.

The challenge process is a critical verification mechanism that ensures funds are allocated only to projects that expand broadband availability in Idaho to bridge the digital divide, rather than projects that waste finite taxpayer resources on duplicative networks in areas that already have broadband service or have been funded to receive service by other programs.

Conclusion:

Spectrum appreciates the opportunity to make recommendations to the Board and does so in service of the shared goal of further closing the digital divide in Idaho. The above recommendations have been designed to prioritize those areas most in need - unserved and underserved households and businesses- while maximizing broad participation and effective program implementation. Spectrum stands ready as a resource and partner in the expansion of broadband availability in Idaho, and appreciates the Board’s attention to our comments, which are offered constructively to improve the components that pose negative, unintended consequences and detract from the central goal to get all Idahoans access to broadband.

Respectfully submitted,



Stafford G. Strong

Senior Manager, State Government Affairs – Washington and Idaho



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,

Once again, I want to thank you for the opportunity to submit comments. Having stakeholders involved in the planning process is very beneficial. I'll provide the following comments regarding the proposed Capital Project Fund Grant.

- a. I am concerned about the State of Idaho defining specific pricing requirements. Service providers are already navigating federal affordability requirements so adding another layer of regulation will just add confusion. There are varied opinions on what "affordable" means from different federal, state, and local agencies. The 2023 FCC Reasonable Comparability Benchmark for 100/20 broadband is \$105.03. This means that CusterTel is currently required to charge less than \$105.03 for the 100/20 tier of broadband service. The State's proposed rate of \$50 for that same service is less than half of what the FCC determined is appropriate. This is a very big discrepancy between what the State of Idaho is proposing and what the FCC currently requires.
- b. The FCC publishes the Reasonable Comparability Benchmarks annually for voice and broadband service. If the State of Idaho imposes their own guidelines, will they be updated annually? Who will do that? What methodology will be used to determine how to set those prices? It appears burdensome and unnecessary for the State of Idaho to attempt to manage affordability. CusterTel participates in the Affordable Connectivity and Lifeline programs. They are very good programs that help consumers pay for broadband service. I am confident that as the price of broadband fluctuates the ACP and Lifeline credits will be revised accordingly. I feel requiring ACP and Lifeline participation of service providers is a better way of ensuring affordability than the State of Idaho arbitrarily setting pricing requirements.
- c. I feel it's important for any of the grant programs the State of Idaho creates to have clear guidelines, objectives, and processes. The scoring criteria should be easy to understand and transparent in nature. The structure of the grant, the scoring criteria, and all processes and guidelines should be in place before the application process begins.

This institution is an equal opportunity provider and employer.

I am confident that all of the service providers who are involved in commenting on and applying for these grants have many demands on their time and resources. Smaller providers like CusterTel do not have the staffing resources to navigate overly complicated regulations or grant requirements. Having a straightforward, simple, and transparent grant program will ensure that we spend less time navigating the grant programs and more time focusing on expanding our networks and serving our subscribers. I have recently provided several other comment letters for your consideration. Rather than providing the same comments again in such a short period of time I will trust that you have already taken the time to consider my previous input. If you have any questions feel free to let me know and I'd be happy to help in any way I can. Thank you for your time.

A handwritten signature in blue ink, appearing to read "J.D. Bennetts", with a long horizontal line extending to the right.

J.D. Bennetts
CEO/General Manager



January 11, 2023

RE: Comment on the Capital Projects Fund (CPF) grant guidelines
ATTN: Ramón S. Hobdey-Sánchez

Dear Idaho Broadband Advisory Board,

Over the last two years, ETS has worked with the Region IV Development Association to provide no-cost Broadband and Technology assessments, Community Outreach Programs, and Community Broadband Plans for numerous cities and counties. ETS has collected a great deal of actionable information by working closely with County and Municipal leaders, other service providers, community institutions, businesses, public safety groups, and citizens. These “boots on the ground efforts” and thousands of man-hours volunteered have been invaluable in truly learning the individual needs of the great communities that are the backbone of Idaho and this country. We are fully aware of the struggles facing individual communities and the people that comprise them as it relates to the shortcomings of internet services in rural Idaho.

We have found that the *qualitative* attributes of a broadband plan can be just as important to success as quantitative speed requirements and numbers of households reached. We submit that planning and verification are key in helping the IBAB achieve its goals. In the following letter, we propose five points for consideration by the Board as it refines the CPF Guidelines that address common hurdles identified in all the communities we have partnered with, including *accessibility/affordability of middle-mile, multi-technology solutions to solve unique challenges per community, enhanced guidelines and oversight for proposed and funded projects to ensure accountability, and application affordability while promoting choice.*

We respectfully submit this document and ask for serious consideration on behalf of the communities we have worked with and in light of the thousands of hours volunteered to help communities build broadband plans, access funding, and build better communities through technology. ETS is committed to the vision the Idaho Broadband Strategic Plan set forth and will continue to provide expertise to communities facing acute needs here in Idaho. As an Idahoan myself, I am passionate about building up my community and all Idaho communities. I look forward to working with the IBAB to create a better Idaho.

I would be happy and grateful for the opportunity to discuss these ideas further with any Board or Broadband team member at your request. Thank you for your time, efforts, and consideration.

Sincerely,



Jacob Johnson
Chief Technology Officer

Mobile 801 499 3608
Office 208 647 7153
jacob.johnson@etscorp.com

932 E 00 S, Bldg B, Declo, ID 83323
www.ETSCorp.com

We deeply appreciate the efforts of the board and the commerce department in creating the grant guidelines for the CPF grant approaching this spring. We ask the board to consider the following ideas when finalizing the grant requirements and to seek to raise the bar for projects under consideration.

- ***Would you build a highway and make every on-ramp a toll road with different costs and management?*** Open-access middle-mile infrastructure can be better defined and regulated to ensure equity and alignment with the state's goals. Considering options or verbiage to make a percentage of state-funded middle-mile available for management by a passionate but impartial entity would bring more choices for communities and allow for more public and private funding to be directed at last-mile infrastructure. Middle-mile should not be weaponized to dissuade competition or prevent choice.
- ***Trust but Verify.*** We encourage the board to consider a more robust project review and engineering assessment. Hiring an independent engineering assessor to audit project feasibility, prevent duplicate efforts, and protect state investments would decrease waste and increase community service. A defined *project completion audit* would also improve accountability and protect the state's investment in these essential services and infrastructure. We see this as essential to allow for more dollars to be directed to quality projects and communities with serious needs. These enhancements would easily pay for themselves in the prevention of duplication of efforts as well as fraud waste and abuse.
- ***The right tool for the right job, but with more than just a hammer in the toolbox.*** We encourage the board to consider a multi-technology approach to economical and high-quality service. There is often no one solution that meets the needs of every member of every community. We encourage the consideration of multi-technology comprehensive broadband access that includes cutting-edge fiber, fixed wireless, cellular, and satellite solutions to reach the most citizens as soon as possible while achieving efficacy and economy.
- ***A well-executed plan is better than a perfect plan or no plan.*** We encourage the board to consider making more planning dollars available to communities. Many communities have suffered pain points in the building and execution of broadband infrastructure due to inadequate policies protecting the community. Clear *protective permitting, licensing, and bonding requirements* for companies performing the work would prevent many issues. With adequate planning opportunities, communities can better advocate for their desired outcomes in alignment with the state's goals and vision. This would also go a long way to prevent waste and poor or incomplete services.
- ***Affordability for rural communities brings to mind the parable of the Widow's Mite. The Widow's Mite is considered more precious than a pile of gold.*** We encourage the board to consider the affordability of grant applications for smaller and more rural communities. As match requirements move higher, communities without dollar-for-dollar matches can be at a considerable disadvantage. A relatively small match for one community may represent a substantial financial commitment compared to a larger match from a wealthier community. We encourage the board to more heavily consider feasibility, proforma data, community partnerships, and long-term sustainability as factors of economic efficiency and viability.

We respectfully request that the board give serious consideration to these suggestions. We desire nothing more than to help align the efforts of communities with the Idaho Broadband Strategic Plan. We look forward to continuing our efforts in serving with the IBAB to meet the broadband needs of our communities.



202 Falls Ave., P.O. Box 5079, Twin Falls, ID 83303-5079 ♦ Phone (208) 732-5727

January 11th, 2023

Ramón S. Hobdey-Sánchez, Broadband Program Manager
Idaho Department of Commerce
P.O. Box 83720
Boise, ID 83720-0093

RE: Capital Projects Fund grant guidelines

Dear Idaho Broadband Advisory Board,

Region IV Development is writing to support revisions to the Capital Projects Fund (CPF) grant guidelines, as outlined by ETS. Since 2020, the need for reliable access to broadband that is affordable has become a prominent concern in our region. Like many communities across the nation, the COVID-19 pandemic strained our residential broadband services. Additionally, South-central Idaho's large agriculture production also relies on reliable internet for GPS yield monitoring, soil mapping, livestock monitoring, precision feed, and robotic milking. Closing the digital divide across our communities is crucial to ensuring access to education and healthcare while simultaneously making our communities more attractive to industrial development and growth.

Common hurdles regional communities have encountered are *middle-mile access, multi-technology solutions, application affordability, community protection policies, and project accountability*. I believe ETS's recommendations to the CPF grant guidelines will help the State of Idaho best address these issues. Thank you for your time and your efforts to improve broadband access across the State of Idaho.

Sincerely,

A handwritten signature in blue ink that reads 'Jeffrey C. McCurdy'.

Jeffrey C. McCurdy, President

LINCOLN COUNTY COMMISSIONERS

Lincoln County Courthouse
Shoshone, Idaho



January 11th, 2023

RE: Comment on the Capital Projects Fund (CPF) grant guidelines

ATTN: Ramón S. Hobdey-Sánchez

Dear Idaho Broadband Advisory Board,

The Lincoln County Board of Commissioners, support the findings of our trusted technology partner ETS. In our communities, some common hurdles we have encountered are ***middle-mile access, multi-technology solutions, application affordability, community protection policies, and project accountability.***

We encourage the board to consider the factors detailed in the commentary from ETS and echo the findings within. We appreciate the time and effort the board is taking to finalize the CPF grant guidelines and the attention the board is affording to small rural communities like Lincoln County.

The Lincoln County Board of Commissioners in conjunction with our partner ETS would be happy and grateful for the opportunity to discuss these ideas further with any Board or Broadband team member at your request.

Sincerely,

A handwritten signature in black ink that reads 'Rebecca Wood'. The signature is fluid and cursive.

Rebecca Wood

Chairman- Lincoln County Board of Commissioners

Lincoln County, Idaho

commishwood@gmail.com

208-320-1387

January 11th, 2023

RE: Comment on the Capital Projects Fund (CPF) grant guidelines

ATTN: Ramón S. Hobdey-Sánchez

Dear Idaho Broadband Advisory Board,

The Mayor and Council for the City of Richfield support our trusted technology partner ETS. In our communities, some common hurdles we have encountered are ***middle-mile access, multi-technology solutions, application affordability, community protection policies, and project accountability.***

We encourage the board to consider the factors detailed in the commentary from ETS and echo the findings within. We appreciate the time and effort the board is taking to finalize the CPF grant guidelines and the attention the board is affording communities and the organizations within like ours.

The Richfield City Council, and I, in conjunction with our partner ETS, would be happy and grateful for the opportunity to discuss these ideas further with any Board or Broadband team member at your request.

Sincerely,

A handwritten signature in black ink that reads "Tom Naylor". The signature is fluid and cursive, with the first name "Tom" being more prominent than the last name "Naylor".

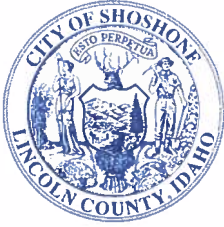
Tom Naylor

Mayor

City of Richfield

tom@richfield-id.com

(208)487-2755



City of Shoshone

P.O. Box 208
Shoshone, Idaho 83352

January 11th, 2023

RE: Comment on the Capital Projects Fund (CPF) grant guidelines

ATTN: Ramón S. Hobdey-Sánchez

Dear Idaho Broadband Advisory Board,

I, Dan Pierson, Mayor of the City of Shoshone, support the findings of our trusted technology partner ETS. In our communities, some common hurdles we have encountered are ***middle-mile access, multi-technology solutions, application affordability, community protection policies, and project accountability.***

We encourage the board to consider the factors detailed in the commentary from ETS and echo the findings within. We appreciate the time and effort the board is taking to finalize the CPF grant guidelines and the attention the board is affording communities like ours.

I, in conjunction with our partner ETS, would be happy and grateful for the opportunity to discuss these ideas further with any Board or Broadband team member at your request.

Sincerely,

A handwritten signature in blue ink, appearing to read "Dan Pierson".

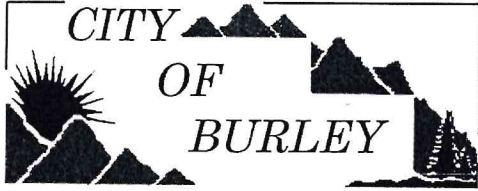
Dan Pierson

Mayor

City of Shoshone

dpierson@shoshonecity.com

208-316-2704



City of Burley
1401 Overland Ave
Burley ID, 83318
(208) 878-2224

January 11th, 2023

RE: Comment on the Capital Projects Fund (CPF) grant guidelines
ATTN: Ramón S. Hobdey-Sánchez

Dear Idaho Broadband Advisory Board,

As City Administrator of Burley, Idaho I support the findings of our trusted technology partner ETS. In our communities, some common hurdles we have encountered are *middle-mile access, multi-technology solutions, application affordability, community protection policies, and project accountability.*

We encourage the board to consider the factors detailed in the commentary from ETS and echo the findings within. We appreciate the time and effort the board is taking to finalize the CPF grant guidelines and the attention the board is affording the City of Burley to submit comments for your consideration.

I in conjunction with our partner ETS would be happy and grateful for the opportunity to discuss these ideas further with any Board or Broadband team member at your request.

Sincerely,

Mark A. Mitton
City Administrator
City of Burley
mmitton@burleyidaho.org
Office 208-878-2224



January 11th, 2023

RE: Comment on the Capital Projects Fund (CPF) grant guidelines

ATTN: Ramón S. Hobdey-Sánchez

Dear Idaho Broadband Advisory Board,

I as the City Administrator for the City of Heyburn support the findings of our trusted technology partner ETS. In our communities, some common hurdles we have encountered are ***middle-mile access, multi-technology solutions, application affordability, community protection policies, and project accountability.***

We encourage the board to consider the factors detailed in the commentary from ETS and echo the findings within. We appreciate the time and effort the board is taking to finalize the CPF grant guidelines and the attention the board is affording communities like ours.

We, in conjunction with our partner ETS would be happy and grateful for the opportunity to discuss these ideas further with any Board or Broadband team member at your request.

Sincerely,

Tony Morley
City Administrator
City of Heyburn
tmorley@heyburncity.org
208-679-8158



JEROME COUNTY COMMISSIONERS

A. Ben Crouch
Chairman

John Crozier
Vice Chairman

Charles M. Howell
Commissioner

Michelle Emerson
Clerk

January 11, 2023

RE: Comment on the Capital Projects Fund (CPF) grant guidelines
ATTN: Ramón S. Hobdey-Sánchez

Dear Idaho Broadband Advisory Board:

I, John Crozier, a county commissioner in Jerome County, supports the findings of our trusted technology partner ETS. In our communities, some common hurdles we have encountered are *middle-mile access, multi-technology solutions, application affordability, community protection policies, and project accountability.*

We encourage the board to consider the factors detailed in the commentary from ETS and echo the findings within. We appreciate the time and effort the board is taking to finalize the CPF grant guidelines and the attention the board is affording communities like ours.

There are a lot of things I do not know about the business of providing broadband to a county, but we see and hear about good things that ETS is doing in adjacent counties, and they have been helpful to us in creating a direction for us to go forward in helping folks in our county get the internet service they will more increasingly need.

I, in conjunction with our partner ETS, would be happy and grateful for the opportunity to discuss these ideas further with any Board or Broadband team member at your request.

Sincerely,

John Crozier

Commissioner

Jerome County Idaho

(208) 644-2703

jcrozier@co.jerome.id.us

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January 10th, 2023

RE: Comment on the Capital Projects Fund (CPF) grant guidelines

ATTN: Ramón S. Hobdey-Sánchez

Dear Idaho Broadband Advisory Board,

I, Mayor Art Watkins, in Jerome County, for the City of Hazelton, ID support the findings of our trusted technology partner ETS. In our communities, some common hurdles we have encountered are ***middle-mile access, multi-technology solutions, application affordability, community protection policies, and project accountability.***

We encourage the board to consider the factors detailed in the commentary from ETS and echo the findings within. We appreciate the time and effort the board is taking to finalize the CPF grant guidelines and the attention the board is affording the Hazelton ID community like ours.

I, in conjunction with our partner ETS would be happy and grateful for the opportunity to discuss these ideas further with any Board or Broadband team member at your request.

Sincerely,

Art Watkins
Mayor
City of Hazelton
mayor@cityofhazelton.com
208-829-5415

This was approved via telephone with Mayor Art Watkins on 01/10/2023

Hazelton Idaho City Hall
246 Main St. / PO Box 145
Hazelton, ID 83335
Phone: 208-829-5415

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BOARD OF COUNTY COMMISSIONERS

P.O. Box 417
Gooding, ID 83330
(208) 934-4841

Susan Bolton © Mark Bolduc © Ronald Buhler
Denise M. Gill, Clerk

January 11th, 2023

RE: Comment on the Capital Projects Fund (CPF) grant guidelines
ATTN: Ramón S. Hobdey-Sánchez

Dear Idaho Broadband Advisory Board,

We, Mark E. Bolduc and Susan M. Bolton, Gooding County Commissioners support the findings of our trusted technology partner, ETS. In our communities, some common hurdles we have encountered are *middle-mile access, multi-technology solutions, application affordability, community protection policies, and project accountability.*

We encourage the board to consider the factors detailed in the commentary from ETS and echo the findings within. We appreciate the time and effort the board is taking to finalize the CPF grant guidelines and the attention the board is affording communities like ours, especially for our *educational institutes and health organizations.*

The Gooding County Commissioners in conjunction with our partner ETS would be happy and grateful for the opportunity to discuss these ideas further with any Board or Broadband team member at your request.

Sincerely,

Mark E. Bolduc
Chair, Gooding County Commissioners
mbolduc@co.gooding.id.us
208-539-6199

Susan M. Bolton
Gooding County Commissioner
sbolton@co.gooding.id.us
208-731-3482

January 11th, 2023

RE: Comment on the Capital Projects Fund (CPF) grant guidelines

ATTN: Ramón S. Hobdey-Sánchez

Dear Idaho Broadband Advisory Board,

I Greg Adams, in Teton County support the findings of our trusted technology partner ETS. In our communities, some common hurdles we have encountered are ***middle-mile access, multi-technology solutions, application affordability, community protection policies, and project accountability.***

We encourage the board to consider the factors detailed in the commentary from ETS and echo the findings within. We appreciate the time and effort the board is taking to finalize the CPF grant guidelines and the attention the board is affording communities like ours.

I in conjunction with our partner ETS would be happy and grateful for the opportunity to discuss these ideas further with any Board or Broadband team member at your request.

Sincerely,

Greg Adams
Teton County
IT Director
gadams@co.teton.id.us
208-354-2703





January 10, 2023

Idaho Broadband Advisory Board
c/o Ramón S. Hobdey-Sánchez, J.D.
State Broadband Program Manager
Idaho Department of Commerce
P.O. Box 83720
Boise, ID 83720 – 0093
By email: broadband@commerce.idaho.gov

Re: Comments on the Capital Project Funds (CPF) Draft Guidelines – Matching Requirement

Dear Idaho Broadband Advisory Board:

Imagine Idaho Foundation is deeply concerned about burdensome matching requirements in the CPF Draft Guidelines for high-need community (non-profit, political subdivisions, and local government) applicants that do not have cash resources and limited ARPA allocations. We urge you to consider for high-need areas substituting a matching percentage with 1) in-kind matching that is weighted differently than cash or debt matching, and/or 2) state award grant payment contingent on a reduced private sector match after a proposal is awarded so that the award is an incentive to potential private sector partners to bid on the project.

Outside of Idaho's major metropolitan areas, Idaho's unserved and underserved residents are in communities that do not operate with large cash reserves. They are fiercely independent, self-reliant, and do not over burden their tax base with bonds and local assessments. Because they are rural and remote, they are often overlooked by private internet service providers (ISPs) because the economics don't pencil out. The CPF and other federal broadband funds dedicated to Idaho are intended as once in a generation funding to help these unserved and underserved communities develop projects that are attractive to the private sector to participate. The CPF funds themselves are an incentive for Idaho communities to get the attention of ISPs, once the funding is committed through a grant award to a well thought out, community driven proposal.

We are working with several rural local public entities with well researched projects, stakeholder engagement and in-kind support who would like to utilize their award in a competitive bid process once awarded by the state. Having a private sector match for every application to the state would not be realistic in advance of the submission because they would have to run an RFP prior to their state award, with little incentive for private sector bids. We recommend the award could be contingent on a reduced private partnership match, if not secured before their submission.

Applicants without cash resources or debt matching should not be penalized in points. They may present in-kind matching with reasonable assessments applied to value of the in-kind asset. These assets may be tangible like power poles or rights of way but may also be more intangible like educational support, training certifications offered, and donated planning services. These in-kind assets should be given higher point value because they point to community involvement that will foster success.

Criteria that could be used to designate a high-need area and allow for an alternative matching program include one or more of the following:

- Classification of rural, frontier and remote areas with an average density below the USDA threshold of residents per square mile;
- Percentage of households in Opportunity Zones;
- Percentage of area classified as Severely Vulnerable Communities;
- Rank in median household income or poverty rate in Idaho; **or**
- Low-density population areas with number of households without access to reliable broadband service at 100/20 Mbps or 25/3 Mbps.

Communities applying that are rural, remote, high-need and have a very low tax base have historically not been priority projects for infrastructure funded by the private sector. Lessening or eliminating the burden of a match for applicants with high-need criteria would make projects more attractive for ISPs participation, building public private partnerships, and getting Idahoans connected.

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 displayed on a light blue rectangular background.

Christina Culver
Director



January 11, 2023

Sent Via Email To: broadband@commerce.idaho.gov

Idaho Department of Commerce
Attn: Ramón S. Hobdey-Sánchez,
P.O. Box 83720
Boise, ID 83720-0093
Fax: 208-334-2631

Re: Newmax, LLC dba Intermax Networks' Public Comment Regarding CPF Grant Guidelines

Dear Mr. Hobdey-Sánchez, Chairman Vander Woude, and Broadband Advisory Board Members:

Newmax, LLC dba Intermax Networks (hereinafter "Intermax") submits this response to the Idaho Broadband Advisory Board's Request for Public Comment on the Capital Project Fund ("CPF") grant guidelines released on December 27, 2022. Below are Intermax's comments to the CPF Projects Summary dated December 16, 2022. These comments only include items at issue or not included in the Summary – it does not include items already required and explained by the Treasury Guidelines.

I. Eligible Project

1. To make the greatest investment and use of funds considering the number of connections or the economic need in last-mile connections, an eligible project must provide scalable technology for future needs will be given priority. Where it's possible, preferential points will be given for fiber to the premises.
2. Awarded applicants will have until December 31, 2026 to reach substantial completion for the project. Substantial completion is defined by Treasury as the date for which the Project can fulfill the primary operations that it was designed to perform, delivering services to end-users. At substantial completion, service operations and management systems infrastructure must be operational. It is the responsibility of the applicant to notify the Idaho Broadband Advisory Board regarding any issues that have or would prevent this time frame from being met.

II. Eligible Program Costs

Allowable costs are determined in accordance with the cost principles identified in 2 C.F.R. Part 200, Subpart E. Federal funds committed to an award may only be used to cover allowable costs incurred during the period of performance and for allowable closeout costs incurred during the grant closeout process. Please refer to Treasury's Capital Projects Fund Guidance for States, Territories, and Freely Associated States and the FAQs issued on April 28, 2022, for additional information on eligible costs.

III. Matching Funds Requirement

Each eligible applicant provides at least 25% of the money needed for the proposed project with higher priority to proposed projects for which the eligible applicant provides a greater percentage of the money needed for the proposed project. Additional points should be given for every 5% in additional matching funds above the required 25%.

IV. Affordability

Rather than fixing the price for service, the cost of which will vary around the State and from project to project, the Board should require that successful applicants participate in the FCC's Affordable Connectivity Program ("ACP"). In addition, successful applicants must adhere to the reasonable comparability benchmarks for cost of service provided by the FCC in the Urban Rate Study then in effect at the time of construction completion. <https://us-fcc.app.box.com/v/DA-22-1338pdf> .

V. Compliance with Other Requirements

All projects must adhere to requirements provided in the *Guidance for the Coronavirus Capital Projects Fund For States, Territories & Freely Associated States U.S. Department of the Treasury*, (September 2021), <https://home.treasury.gov/system/files/136/Capital-Projects-Fund-Guidance-States-Territories-and-Freely-Associated-States.pdf> .

VI. Scoring Criteria and Evaluation Process

The following suggested criteria could be used by the Board to score applications for this Grant Program including a rank of 1 to 5 (5 being the highest) for each category:

- Project Design and Implementation (25%)
 - Design of project and scope of work.
 - A project timeline is a required document for this section. Failure to submit a project timeline will result in an application being deemed incomplete.
 - Cost of project.
 - Technology used.
 - Locations served.
 - Compliance with the Idaho Broadband Strategic Plan.
- Capabilities and Competencies (25%)
 - Proven history of success with other public broadband programs.
- Greatest Investment in Last-mile Connections - Technology, and number of passes (15%)
- Project Budget (including matching funds) (30%)
 - Documentation of the amount of grant funds being requested along with a detailed budget and matching funds must be submitted using the

provided budget template. Failure to do so will result in an application being deemed incomplete. Additional points should be given for every 5% in additional matching funds above the required 25%.

- Community Engagement (5%)
 - Including letters of support from local governments, elected officials, residents, public surveys, etc.

All applications will be reviewed for eligibility and completeness, and then evaluated based on the priorities and criteria identified herein. Recommendations will be made to the governor for final selection.

VII. Challenge Process

CHALLENGE PROCESS:

- (a) Within seven (7) calendar days of the close of the grant application process, the Board shall publish on its website the proposed geographic broadband service area and the proposed broadband service speeds for each application submitted.
- (b) An existing broadband service provider in or proximate to the proposed project area may, within 10 calendar days of publication of the information under paragraph (a), submit in writing to the Board a challenge to an application. A challenge must contain information demonstrating that:
 - (1) the provider currently provides or has begun construction to provide broadband service to the proposed project area at speeds equal to or greater than 100 Mbps download and 20 Mbps upload; or
 - (2) the provider commits to complete construction of broadband infrastructure and provide broadband service in the proposed project area at speeds equal to or greater than 100 Mbps download and 20 Mbps upload no later than 12 months after the date grant awards are made under this section for the grant cycle under which the application was submitted.
- (c) The Board must evaluate the information submitted in a provider's challenge under this section and is prohibited from funding a project if the Board determines that the provider's commitment to provide broadband service that meets the requirements of paragraph (b) in the proposed project area is credible. The burden of proof rests with the provider submitting the challenge.
- (d) Applicants have 7 calendar days to respond to a challenge.

- (e) Providers wishing to submit challenges on multiple applications must submit a separate challenge for each application.

CHALLENGE DOCUMENTATION REQUIREMENTS:

Challenges will only be considered from providers that filed Broadband Data Collection filings beginning on June 30, 2022. A provider must include in its challenge information documentation: that existing service is available at or above 100 Mbps download and 20 Mbps upload or verification that the construction plans are under way (permits, materials purchased, etc.) to deploy broadband service of at least 100 Mbps download and 20 Mbps upload and have executive sign-off, budget assigned, etc. for service availability before December 31, 2024 to support that it will provide broadband service at or above 100 Mbps download and 20 Mbps upload to the full project area. If the provider is only challenging a portion of the project area, the provider must identify the portion challenged at the same level of detail provided in the application and provide the same documentation as for a full project challenge.

The challenge must also identify the broadband speed(s) that will be available throughout the challenged portion of the project. For an application, the challenger must document that service is or will be provided at speeds of at least 100 Mbps download and 20 Mbps upload. Challenges shall contain detailed information with address level data with broadband speed identified, as contained in the Broadband Data Collection filing.

The following materials are also required:

- A signed and notarized affidavit affirming that the challenge and attached information is true.
- Current FCC BDC Filing Form.
- Minimum/maximum speeds available in the proposed project area.
- Number of serviceable units within the proposed project area and the speeds those serviceable units are able to receive.
- Street-level data of customers receiving service within the proposed project area.
- Point shapefiles that show each proposed passing in the challenged area, designated by a singular mapped point, containing attribute data showing the addresses of each point. Polygon shapefiles delineating the general challenged area(s). (Note: These files must be provided in .zip file form.)

CREDIBLE CHALLENGES:

Following evaluation of the information contained in the provider's challenge:

1. The Board will determine whether a challenge is credible. If a challenge is found to be credible, no funding will be awarded to that project or portion of a project.
2. If a credible challenge was submitted for only a portion of a project, the rest of the project will continue through the review process for possible grant award.
3. Where a provider's challenge has been found to be credible, the Board will notify the provider.
4. The Board will also post on its website a list of challenges found to be credible and whether for the full or a portion of the project area.
5. If a challenge is found to be credible, an applicant may choose to submit additional supporting documentation within its full application to provide evidence of lack of service for each address provided in the project area. The Board will ultimately utilize the information provided in the challenge and full application to determine whether the addresses provided may receive funding.
6. For each challenge found to be credible, the challenging provider must submit documentation no later than 12 months from the grant award dates for this grant round to the Board substantiating that it has fulfilled its commitment to deploy broadband service to the challenged area at the speeds identified in its challenge. If the challenger fails in its commitment, the Board shall award the funding requested to the applicant.
7. In its review of whether the provider has met its commitment, the Board may consult with the grant applicant.
8. The Board shall decide all challenges within 14 calendar days of the applicant's response, or, if the applicant fails to respond to a challenge, the existing service provider's challenge.

VIII. Grant Agreement

An applicant selected for funding through the CPF Grant Program that wishes to accept this award must execute a CPF Grant Program Terms and Conditions within 30 days of award announcements. The State will not accept proposed changes or amendments to the Terms and Conditions. Failure or refusal to comply with this requirement will result in award funds being rescinded.

IX. Reporting

Applicants awarded funding through the CPF Grant Program will be subject to all reporting requirements as set forth by the State and Treasury.



X. Oversight

Subrecipients awarded funding through the CPF Grant Program will be subject to audit or review by the Treasury Inspector General and Government Accountability Office.

Sincerely,

Caitlin Kling

Caitlin Kling
General Counsel

January 9, 2023

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

Idaho Department of Commerce
Attn: Ramon Hobdey-Sanchez
PO Box 83720
Boise, ID 83720-0093

Re: Idaho ARPA Capital Projects Fund Program Summary

ZiPLY Fiber appreciates the opportunity to provide comment and information to the Idaho Broadband Advisory Board regarding the proposed ARPA Capital Projects Fund Program (CPF) Summary.

Program Description: We applaud the consistency in aligning the goals of the projects funded through ARPA CPF funds with that of the strategic plan for the Idaho Broadband Advisory Board (IBAB). Furthermore, adopting definitions of unserved and underserved consistent with other federal programs will ensure a streamlined approach to publicly funded broadband infrastructure.

Funding Availability for FY2023/24: To date, our direct experience with CPF funding is in Washington State who issued their Notice of Funding Opportunity for CPF funds in November 2022. The Washington Broadband Infrastructure Grant maximum project award is \$ 12 million.

Eligible Applicants: Again, we applaud IBAB for their recognition that solving the digital divide will require private-public partnerships. Enabling private providers as eligible applicants will drive development of cost effective and economically sustainable fiber infrastructure expansions. Together we can solve the digital divide challenge.

Eligible Project Areas: US Treasury Guidance for the Coronavirus Capital Projects Fund for States, Territories & Freely Associated States, encourages prioritization of projects designed to provide access where no access to 100/20 Mbps. Given the Idaho Broadband Plan mission to prioritize funding to the most needed areas, IBAB may seek to utilize available funding to connect those unserved (lacking access to 25/3 Mbps). By leveraging the limited amount of funding in CPF to initiate connecting the most affected by the digital divide, the IBAB could kick start deployment while it awaits the availability of Broadband Equity, Access and Deployment infrastructure funding.

Eligible Program Costs: US Treasury Guidance for the Coronavirus Capital Projects Fund for States, Territories & Freely Associated States, allows costs associated with network design, engineering, permitting as well as cultural and environmental reviews. Generally speaking, grant applications are submitted using preliminary engineering to determine fiber cable lengths and Central Office equipment upgrades required. Post award a site walk and final detailed

engineering is completed insuring the most accurate construction specifications are considered for permitting and pole attachment agreements. Basing a grant application on preliminary engineering is a risk an applicant takes in submitting grant application costs. Considering nuances between preliminary and field conditions that affect final engineering, we recommend IBAB provides awardees flexibility within budget to modify cost categories items by a limited amount, such as +/-10%.

Matching Funds Requirement: Applicant match demonstrates commitment, however, the level of match must be thoughtful as the targeted grant areas are inherently high cost where partner support is needed. We recommend that Idaho adopt a limit of 90% grant funding towards total project costs and that in-kind contributions are allowable as match. In-kind contributions, demonstrate commitment from a project partner, lower project costs and extend the reach of the program funding. For example, a private provider may have staff engineers who can design the project. The value of those engineers' time is a legitimate direct contribution. Allowing for in-kind match will help to alleviate the pressure on the available resources to support projects by encouraging providers who have a skilled workforce to leverage these assets to the benefit of the program.

Affordability: We encourage the IBAB to require applicants participate in the Affordable Connectivity Program (ACP). However, the pressure on the ACP funds should not be overlooked as this was one-time money allocated to assist in addressing affordability of broadband service. We recommend a scoring criterion giving consideration for additional points to applicants offering access to the Federal Lifeline program. The reasoning is – Federal Lifeline is tied to ongoing Federal Universal Service Fund support; the ACP will eventually run out as it is not tied to an ongoing funding mechanism. Further, the IBAB may consider scoring criterion that reward applicants who have established a product that has the net cost to qualified households of \$0, addressing affordable access.

Community Engagement/Open Public Comment Period:

Application Window and Deadlines: To ensure a robust application and sufficient time for community engagement, we recommend that a grant application period be open for no less than eight weeks.

Challenge Period: We recommend that a defined challenge process be defined as part of a funding announcement notice and that no challenges be permitted once an award is issued.

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

Sincerely,



Jessica Epley
VP - Regulatory & External Affairs