

Title **0015** 03/22/2022
by **Carlee Parker** in **RESPONSE TO PUBLIC COMMENT - BROADBAND ACCELERATION GRANT YR 2 APPLICANTS** id. 23754327
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Original Submission 03/22/2022

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I am providing response comments related to the following application (choose one): **Ideatek - Reno County**

I am responding to concerns this project: **Proposes service to an area in which construction is already underway
Proposes to serve an area that already has service
Proposes to serve an area likely to be served without grant funds because plans are in place to serve this area, although construction has not yet begun**

Please provide your response to the public comments received in the text box below. **Public Comment #61
In order to continue our track record of success in completing projects in a short timeline, Ideatek has already started construction in the Medora and 95th area even though a full completion in all of these areas would yield a return on investment below what we find acceptable. The fact that we are actively working in the market area does not mean that IdeaTek can service the entire area without subsidy. This is not atypical for a provider to build near or adjacent or even within part of the funding area after application submission.**

Based on our return on investment requirements, IdeaTek requires \$252,272 of grant funding in order to continue this expansion to the

underserved communities in red. We understand how a concerned taxpayer might interpret the grant request as funding for projects already started, but if the application is not approved, Ideatek will be forced to select only the profitable households and not continue construction to the most underserved areas in this project. This is the exact situation that causes underserved broadband premises in rural and remote areas today. This situation is not unlike pre award spending that had to occur during the CARES expansion in order to ensure the construction deadlines were met. Internally, Ideatek routinely bundles both very poor, and positive builds together in order to bring internet freedom to underserved areas. Without this approach, other providers only deliver service to the most dense areas, which has created the current lack of service in rural Kansas that Ideatek is working to solve.

Further, MTelco is a competitor of IdeaTek in the Moundridge area but they do not provide service near this area. This claim seems to be more about harming IdeaTek's chances at obtaining this grant by casting doubt on our application than any particular interest in providing service in the area.

We stand behind premise-level speed test data and community support letters we provided as evidence of the need in this area.

Public Comment # 67 -

Relating to the comments about speeds being offered by CenturyLink in the proposed grant areas, as demonstrated by the survey data that was compiled in the grant application there were 54 surveys conducted, only 9 of which indicated they had service with CenturyLink. Centurylink continues to be a very poor provider of service in rural areas and is often the incumbent of service territories with the highest level of service complaints. Of those 9 surveys, none of the speed tests conducted displayed over 24Mbps , and in fact over half of them were merely between 1-9mbps. There were 0 homes receiving the claimed 40/3Mbps speeds described in the reno county public comment #67. Please see the attached supporting documentation.

Reno Public Comment #77 claimed build out by another provider in some of the proposed areas within the next 3 years, the public comment window requested notice of areas that would be served within 12 months. Ideatek would suggest that feasibility studies and engineered construction drawing progress be provided from this provider as further evidence, as it is likely these steps would have been taken if build out in the next 12 months was planned. If the office of broadband will be considering public comments regarding areas planned to be served by a provider within 3 years, Ideatek would like the opportunity to re-review and submit public comment on other BAG Year 2 applications, as we have several plans for the next 3 years. We also find these claims suspect given the limited profitability of these areas.

Regarding public comment #62, IdeaTek incorporates paragraphs #1

and 2 of our response to MTelco in this response.

Further, MTC is a competitor of IdeaTek in the Little River area but they do not provide service in this area. This claim seems to be more about harming IdeaTek's chances at obtaining this grant by casting doubt on our application than any particular "taxpayer" interest in providing service in the area.

We stand behind premise-level speed test data and community support letters we provided as evidence of the need in this area.

Please provide supporting documents relative to your comments. Please submit multiple files as a ZIP file.

[RenoCounty_PublicCommentResponses.zip](#)

Carlee Parker 3/22/2022

By submitting this form for public comment and evidence to support your comment, you are accepting responsibility for the accuracy of the information submitted and that it is true and correct to the best of your knowledge. You agree to be contacted by the Kansas Office of Broadband Development, Kansas Department of Commerce should the need arise. Furthermore, by making this submission, you understand that Kansas Department of Commerce and the Office of Broadband Development reserve the right to publicly publish your comment and evidence provided. Falsification of information will result in rejection of future public comment submissions and could result legal action. Please type your name and today's date in the text box below.
