



Mr. Brandon Carson
Executive Director
Pennsylvania Broadband Development Authority

Dear Mr. Carson,

BCAP would like to congratulate you on your appointment as the Executive Director of the Pennsylvania Broadband Development Authority (PBDA). We look forward to working with you and members of the Authority, along with other stakeholders to ensure Pennsylvania uses available funds and resources in an efficient and responsible way. The PBDA -- through participation in the federal Broadband Equity, Access and Deployment (BEAD) program -- has the potential to bring fast, reliable and safe broadband access to every corner of the Commonwealth. While the challenges are complex and the task difficult, we believe success is achievable and, in the spirit of cooperation, we offer the following recommendations:

- **Prioritize Funding to Unserved Areas** – While the funding amounts seem large, we know they are finite. Therefore, priority must be given to spending what is necessary to build networks that serve the currently unserved portions of Pennsylvania. The BEAD statute directs funding towards unserved areas, and we believe that the PBDA should specifically fund all unserved locations before funding of underserved locations.
- **Prioritize Funding of Networks and Operators Capable Keeping Up with Future Network Demands** -- While a technology-neutral approach to access is necessary, priority should be given to network technologies and operators who have proven over time they have the capabilities to upgrade and maintain networks to meet future capacity and consumer demand. The PBDA should screen applicants to ensure their financial, technical and management experience is sufficient to continue to serve customers into the future. It is important that operators -- who have a track record of continuing to invest in their networks after the federal dollars are long gone -- be given preference in any application.
- **Ensure a Fair and Objective Process for Review of Proposed Projects and Granting of Funds** – As noted above, the citizens of Pennsylvania will be best served if capable, experienced and financially sound providers fully participate. This requires that the application process be developed based on clear merits and that the PBDA not include subjective factors and policies that are peripheral to the construction, operation and maintenance of fast, secure broadband networks. It is equally important to develop policies that ensure accountability.
- **Development of a Clear and Concise Challenge Process** – It is incumbent upon the PBDA to develop a challenge process that recognizes priority to unserved areas and allows incumbent operators to challenge potential overbuilds. The PBDA must consider the idea of how challenges to prospective builds will be incorporated into any challenge process.

- **Work with all Relevant Parties to Ensure Smooth and Efficient Construction Processes –** Broadband efforts are but one element of the larger infrastructure efforts occurring throughout the Commonwealth. With varied timing of the release of funding for the various projects, it is important to seek some level of coordination such that there is sufficient coordination so as to not drive delay and additional cost when encountering street cut moratoria, pole replacement issues and other impediments to timely and cost-efficient network construction

BCAP applauds the efforts of the PBDA to date and we look forward to working closely with you and the entire Authority as we work toward implementation and the promise of delivering fast, reliable broadband networks to every Pennsylvanian.

Sincerely,

A handwritten signature in black ink, appearing to read "Todd Eachus". The signature is written in a cursive, flowing style with a long horizontal line extending to the left.

Todd Eachus
President
BCAP-Broadband Communications Association of Pennsylvania