



STATE OF WASHINGTON  
DEPARTMENT OF COMMERCE

1011 Plum Street SE ○ PO Box 42525 ○ Olympia, Washington 98504-2525 ○ 360-725-4000  
[www.commerce.wa.gov](http://www.commerce.wa.gov)

Aaron Wheeler  
Director of the Washington State Broadband Office  
Washington State Department of Commerce – Local Government Division  
[aaron.wheeler@commerce.wa.gov](mailto:aaron.wheeler@commerce.wa.gov)

09/10/24

Subject: NTIA Alternative Technology Guidance

To Evan Feinman, BEAD Program Director

Thank you for the opportunity to comment on NTIA's proposals to allow BEAD funding to reserve LEO Internet capacity and add the requirement that states ensure that equipment is installed at customers' homes to enable them to access high-speed internet. The Washington State Broadband Office supports using alternative technologies for BEAD funds. We believe technologies, including LEO and fixed wireless, will be critical tools we need to bring internet to our hardest-to-reach locations across Washington. Washington isn't unique in that we will have many service locations where installing fiber isn't feasible, and we will be required to pivot to these alternative technologies to meet our goal of reaching Internet for All.

We also believe that allowing alternative technologies into BEAD will build more resiliency in the network. If any technology experienced network failures due to a natural disaster or other issue, our state's network would lean on these varying technologies to allow those areas most impacted by the disaster to access the internet. Washington has an opportunity to work with private sector partners who call our state home and are working to provide broadband internet using these alternative technologies. We would miss an opportunity if we couldn't pursue these technologies with those who are working on these types of solutions in our own state because of any federal restrictions in BEAD.

The Centers for Disease Control and Prevention(CDC) [just released a report that highlights the importance of our work](#). The study found that suicide risk was 44% lower in counties where most homes have broadband internet. This critical supporting fact shows that closing the digital divide is essential to the future health of our most vulnerable communities.

We also propose that the NTIA give states the maximum flexibility possible to implement these technologies as they see fit to best meet their broadband needs. This flexibility will allow Washington to respond quickly and deliver projects that will bring the internet to each location that is currently

underserved and unserved, regardless of the technical challenges a project faces. We believe this flexibility will be critically important to ensure our limited funding can meet the demand for high-speed internet and truly reach Internet for All.

We are also encouraging the NTIA to allow states the flexibility to designate their Extreme High-Cost Threshold (EHCT). When Washington first wrote our estimates for EHCT, we didn't have the information we have today. Giving us the ability to implement an EHCT that best aligns with estimates based on information we have when we begin the application provides us the best chance to meet the goals of BEAD. EHCT is a critical tool we need in our tool chest to meet our goals. Please allow Washington to update the EHCT to align with our current estimates. I am attaching a one-page FAQ draft document that helps explain EHCT and how scoring and prioritization would be handled if approved.

I appreciate the NTIA's partnership on this critical work. Please contact me if you have any further questions.

Sincerely,

A handwritten signature in cursive script, reading "Aaron Wheeler".

Aaron Wheeler  
Director of the Washington State Broadband Office