

PBDA Comments on NTIA Proposed BEAD Alternative Broadband Technology Policy Notice

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The Pennsylvania Broadband Development Authority (PBDA) appreciates the NTIA's draft guidance on alternative broadband technologies. It's imperative to recognize that utilizing alternative technologies will be necessary to achieve 'Internet for All' in Pennsylvania.

Pennsylvania includes an area of 46,000 square miles and is fortunate to have extensive mountains and forests covering vast portions of its geography. These features present unique challenges in deploying reliable, high-speed broadband internet to thousands of Pennsylvania residents and businesses who are in remote and mountainous locations that will be prove costly to serve with wired technologies.

PBDA will prioritize end-to-end fiber-optic deployments where feasible and plans to invest in other last mile technologies such as hybrid fiber-coaxial, coaxial, and licensed fixed wireless when appropriate. However, to provide high-speed internet to the most challenging and expensive locations, alternative technologies like unlicensed fixed wireless and low-earth orbit (LEO) satellite will be needed. PBDA anticipates the possibility that **more than 15,000 remote locations across the Commonwealth may require an alternative technology solution.**

To achieve the goal of Internet for ALL Pennsylvanians, the PBDA asserts that both unlicensed fixed wireless and LEO satellite solutions must be available. However, the language in the draft guidance from NTIA indicates LEO satellite would be excluded from BEAD funds if the LEO companies already achieve required network performance in those areas. While that may be correct for serving the current number of LEO subscribers, the LEO network capacity is insufficient to achieve BEAD performance requirements in all or even a portion of the remaining unserved and underserved locations across the Commonwealth.

Fixed wireless may be suitable for remote locations in some circumstances where the necessary densities can be achieved to entice a wireless provider to build out service. However, Pennsylvania has remote locations that are scattered and may not be economically attractive to serve with fixed wireless.

Pennsylvania should be permitted to serve unserved and underserved locations with alternative technologies based upon the applications that PBDA receives. NTIA should not declare locations served simply because of reported service by LEO satellite, as further investment may be needed to ensure the network is capable of sustaining BEAD performance requirements. Furthermore, PBDA outlines a strategy in its NTIA approved Initial Proposal: Volume II to utilize fixed wireless and LEO satellite. PBDA encourages NTIA to allow states to proceed with the process outlined in their Initial Proposals.

The PBDA encourages NTIA to clarify the eligibility of unlicensed fixed wireless and LEO satellite providers to receive BEAD funding, so Pennsylvania's remote locations are served with **affordable**, high-speed internet that meets **BEAD performance requirements for the next 10 years and beyond.**

Sources: [Pennsylvania Maps & Facts - World Atlas](#)

[Pennsylvania Geography: Pennsylvania Regions and Landforms \(referencedesk.com\)](#)