

US Department of Commerce
National Telecommunications and Information Administration
1401 Constitution Avenue Northwest
Washington, D.C. 20230
USA

9 September 2024

Comments on Proposed BEAD Alternative Broadband Technology Guidance

Dear Sir or Madam,

We believe that a fiber optic broadband network constructed on messenger strand should be the top priority for BEAD funding, as it offers the most reliable, durable, and scalable infrastructure for broadband deployment, with low long-term maintenance costs and easy network expansion. We support the inclusion of Unlicensed Fixed-Point Wireless (ULFW) in the [Proposed BEAD Alternative Broadband Technology Guidance](#) as a critical and cost-effective solution for underserved, low-density areas where fiber may not be feasible. In contrast, we do not view Low Earth Orbit (LEO) satellites as durable infrastructure and believe they should not be funded through the BEAD program due to their limitations in capacity, latency, and lack of permanent, physical infrastructure.

At Bekaert, we have extensive experience in providing high-quality, durable infrastructure for fiber broadband deployment through our messenger strand products. Messenger strand with lashing is one of the most cost-effective installation methods in the industry, enabling broad deployment of fiber networks at an affordable price while maintaining high quality and longevity. Our products are widely used across the United States and are proven to be both versatile and durable, offering significant cost savings over time.

Bekaert messenger strand is not only a robust solution for fiber networks but is also fully compatible with alternative broadband technologies, including Fixed-Point Wireless. This compatibility is crucial for deploying broadband infrastructure in underserved regions where traditional methods may not be economically feasible. Additionally, our strand construction allows for easy upgrades, enabling utilities to expand network capacity without the need for significant new infrastructure investments. This deep expertise in deploying long-lasting, cost-effective broadband infrastructure reinforces our belief that Fixed Point Wireless should be prioritized for BEAD funding as a true infrastructure solution.

Fixed Point Wireless technology is an essential tool for delivering reliable broadband to rural and underserved communities. Its physical infrastructure, including towers, antennas, and relay stations, provides durable and scalable connectivity that meets the long-term needs of these areas. ULFW's ability to support higher speeds, low latency, and future upgrades makes it a vital component of broadband infrastructure, fully aligned with the BEAD program's goals.

In contrast, LEO satellite systems do not create lasting, physical infrastructure on the ground. LEO satellites rely on a network of orbiting satellites with limited lifespans and high maintenance costs, without building any long-term infrastructure in the communities they serve. LEO satellite networks also face significant challenges in terms of capacity, latency, and scalability, making them less reliable for sustainable broadband development compared to Fixed-Point Wireless.

Bekaert strand products are proudly manufactured in the USA at our facility in Van Buren, Arkansas, using 100% US-made steel. Our products comply with the Build America, Buy America (BABA) requirements, ensuring that investments made through BEAD not only support critical broadband infrastructure but also American manufacturing and jobs.

In conclusion, with our deep expertise in broadband infrastructure, we are confident that Fixed Point Wireless, combined with Bekaert's messenger strand, offers an unmatched combination of affordability, durability, versatility, and scalability. These technologies are especially well-suited for expanding broadband networks in underserved areas and align with the goals of the BEAD program to build lasting, reliable infrastructure. We strongly believe that LEO satellites, given their inherent limitations, should not be considered true infrastructure and should not be funded through BEAD.

Thank you for considering our comments. We would be pleased to provide any additional information or discuss how Bekaert can help achieve your policy objectives in a cost-effective and future-proof manner, particularly in underserved areas.

Sincerely,

Curran Lehr

Business Development Manager, Energy and Utilities

Bekaert