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Sent: 9/10/2024, 1:12 AM

To: bead@ntia.gov

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Subject: State of Hawaii comments on NTIA Proposed BEAD Alternative Broadband Technology Guidance

Greetings,

The University of Hawai'i Broadband Office (UHBO), representing the State of Hawai'i's BEAD program, offers the following comments in response to the NTIA Proposed BEAD Alternative Broadband Technology Guidance published on August 26, 2024.

UHBO is concerned that the current language in Section 3.2 Case 2 regarding BEAD funding eligibility for locations exceeding the Extremely High Cost Per Location Threshold (EHCPLT) with an alternative technology provider already available, is written to preclude the use of BEAD funding to support affordable access by alternative technology for a BSL that would otherwise qualify for BEAD funds in excess of the EHCPLT amount. While this may be acceptable in cases where the cost of installation and subscription to access by alternative technology is comparable to high speed wireline broadband service, including an offering that matches the proposed low-cost service option pricing, UHBO urges NTIA to consider the case where the installation and subscription to an otherwise qualified existing alternative technology provider would be substantially over the state's low-cost service option, thereby creating undue economic hardship for residents caught in this case.

For Hawai'i's service area, the only alternative technology provider listed on the National Broadband Map that offers qualifying alternative technology broadband service is a LEOSat provider; note that there are a handful of very small pockets of wideband wireless service available in metro locations that are generally already well served. While such service is generally available statewide, the LEOSat based qualifying alternative technology broadband service would require a resident to incur installation (equipment kit) charges of \$600+, and a monthly recurring charge of \$100 to \$120. Compared with the low-cost thresholds of a nominal installation cost and a \$30 per month recurring charge, residents subject to this sole alternative would be left out of BEAD funding eligibility and would be responsible for costs at a level that would be a severe challenge for economically disadvantaged, and middle income households (e.g., households that were ACP eligible).

UHBO asks that NTIA strongly consider allowing BEAD funds to be eligible for use to fund alternative broadband technology solutions to support one time and recurring charges in excess of the state's low-cost threshold amounts for up to the full term of the federal interest period.

Thank you for the opportunity to provide comments to NTIA's Proposed BEAD Alternative Broadband Technology Guidance. Please feel free to contact me if there are any questions on our

comments including as they relate to Hawaii's BEAD program.

Best.

garret

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