From: Kelly Martin <kmartin@oneweb.net>
Sent: Monday, September 9, 2024 7:23 PM
To: Pietrzak, Lukas <lpietrzak@ntia.gov>
Cc: Martin Marshall <mmarshall@oneweb.net>; Howard Stanley <hstanley@oneweb.net>
Subject: RE: [EXT] FW: NTIA BLOG: Choosing the Right Mix of Technologies to Achieve Internet for All

Lukas,

Hello. Thank you for the opportunity to respond to NTIA's Draft Guidance. Eutelsat OneWeb's response is below:

With regards to the consideration of the use of LEO as an alternative technology to building fiber or using a wireless last mile strategy, we think the particular "one-to-many" model that OneWeb proposes could be very effective in a variety of communities. That is, rather than subsidizing the placement of a LEO antenna at a single household, that instead the LEO antenna forms part of the overall connectivity strategy for a community Point of Presence:

- There are multiple satellite options, and sometimes even pre-existing wireline services into communities today, so LEO can be just one part of an overall network resiliency strategy
- By using LEO and/or other satellite orbits as the "middle-mile" or backhaul, the entire community can share the available capacity efficiently
- Pre-existing infrastructure may be re-usable and enhanced by the addition of LEO capacity, adding additional throughput and redundancy which is increasingly important in the context of environmentally related incidents
- This also mitigates significant power consumption per household as WISP or local fixed infrastructure requires less direct power consumption than LEO terminals in general. This impacts both cost and availability of power
- Beyond simply providing Internet directly to households, building infrastructure within the community will allow the local ISP to make decisions regarding who to provide services to that may factor societal costs such as access to education and healthcare. It is a fact that in many rural and Indigenous communities, power and communications bills have high delinquency rates due to a variety of socio-economic factors, but the total cost to the jurisdiction can in fact be lower if key services can continue to be accessed. These decisions are often best left in the hands of a community-driven ISP, with the right funding model that emphasizes inclusivity
- LEO options will continue to proliferate, so the ability to drive cost efficiencies will be greater in scenarios where the investment in community POP and last mile infrastructure is fed by multiple providers who will each have their own value proposition to defend. Changes to the service would be far more difficult in a 1:1 provider to household scenario
- Different sized communities will have the best option to create infrastructure that suits their communities' needs, while expanding economic opportunities within the community if capital is spent locally to build out a multi-orbit service offering

In general Eutelsat OneWeb is a proponent of a competitive model that sees multiple providers working together to provide a complete solution for entire communities, including households,

businesses and local governments working with a committed ISP to provide a stable and effective service.

Regards
Kelly

Kelly Martin
Account Director
Eutelsat OneWeb

Cell: +1 (703)987-1412
Email: kmartin@oneweb.net