

Comment Info: =====

General Comment:

The proposed changes for the loan program lack a connection between the applicant and the communities that they are supposed to benefit. Within the incentives proposed for the applicants serving areas with no access or only 1 service provider, there should be another option whereby collaborations with recognized community based organizations (CBOs) could offset some of the 10% or 20% credit incentives for equity investments. This collaborative effort would have to provide a demand aggregation activity whereby the applicant and the CBOs work together to inform and excite the community about the importance of broadband. All applicants need to be required to do market surveys in the communities where they plan on offering service.

Our efforts in this area have shown that, through the survey process, education and involvement of communities and its' citizenry is necessary to get the take up rates for sustainability. Addressing community needs early on in the application process and energizing the community is vital to sustainable long-term projects. With buy-in and support from communities for broadband service there is a greater probability that the project will succeed. Aggregation of demand activities needs to be a key part of the application process. Incentives for CBOs as well as the applicants should be given priority especially in areas where no access or only 1 provider exists.

Applicants in most states with small rural populations will not be able to sustain themselves if their plans don't include an energized and involved community base. Build it and they will come does not work if the service area does not understand the benefits of what broadband offers. This activity needs to be a priority in all applications and additional incentives should be offered to applicants that identify community partners and work with them throughout this process.

Our communities need access, but until they fully understand the values that broadband brings they will not provide the take up rates necessary for sustainability. Partnerships created through this application can have a lasting impact on the communities served and provide the long-term commitment providers need. All applicants will gain confidence in their sustainability knowing that their partners will be there to offer support and encouragement.

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