
Monadnock Broadband Group

July 16, 2020

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107 Pleasant Street
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Kath Mullholand, Director
Regulatory Innovation Strategy
NH Public Utilities Commission
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Concord, NH 03301-2429

Frank Edelblut, Commissioner
NH Department of Education
101 Pleasant Street
Concord, NH 03301-3860

Dear Director Chicoine, Director Mullholand and Commissioner Edelblut:

The Monadnock Region and rural parts of the State lag behind other areas with regard to internet broadband connectivity. This issue has been further exposed by the on-going Coronavirus pandemic. From our perspective, additional attention in the form of funding for coordination, design and provision of infrastructure is needed in response. Accordingly, we were very excited by Governor Sununu's announcement last month calling for the Connecting New Hampshire Emergency Broadband Expansion Program in which \$50 million in federal CARES Act funds were assigned. However, this enthusiasm was replaced by disappointment with the release of the request for proposals (RfP) designed for use in awarding program funds. Upon review of the RfP, it became clear that several of its provisions were off-putting and represented significant risk. During its meeting of July 7, 2020, the Monadnock Broadband Group engaged in discussion about the RfP and several issues and concerns were identified including the following:

- The RfP provided a very short turnaround time of two weeks in comparison to the amount of work required to adequately respond.
- Data requirements as outlined in the RfP were extensive - particularly in light of the time allowed to respond.
- Since there is no comprehensive, readily available public data depicting unserved addresses, applicants are immediately forced to request this information - a process that is permitted to take up to 60 days pursuant to state law or as specified in municipal cable franchise agreements. This represents a direct limitation to municipal applicants.
- The required construction schedule is not realistic in the face of project planning, acquiring equipment, engaging with contractors, obtaining access to utility poles, etc.
- A signed affidavit attesting to the accuracy of data is intimidating - particularly when data documenting served (25/3 Mbps) and unserved addresses is questionable, variable throughout the course of a day and uncertain. This represents a risk to the individual that signs the affidavit.

- The required deadline for project buildout and expenditure of any and all awarded funds of 12/15/20 represents a significant deterrent in that it is only possible under limited circumstances and conditions. Furthermore, clarification of where in the federal CARES Act the deadline for such expenditure is specified has not been provided, yet this was a common response to questions and expressions of concern with the RfP over such a constrained deadline.
- Applicants are required to assume a debt burden of 90% of project costs during the construction phase with a risk of non-reimbursement of awarded funds in the event construction and expenditures do not align with the 12/15/20 deadline. Furthermore, there is no accommodation for unforeseen circumstances which could occur with any construction project – particularly during a period of uncertainty during a public health crisis.
- The RfP’s restriction against funding projects which had already entered into arrangements with providers results in penalizing those communities that have been more proactive. Such projects are for the most part “shovel ready” and therefore better positioned to meet the aggressive construction deadline.
- The expressed primary criteria of application review (i.e., the number of addresses to be connected via the award in comparison to program dollars expended) favors more dense development which serves to perpetuate the problem of attracting providers and infrastructure to rural New Hampshire which has been an on-going challenge.

We share the above observations in hopes that they will prove valuable for future funding opportunities which will be necessary for more fully addressing broadband connectivity in New Hampshire including rural areas of the State.

Respectfully,

Monadnock Broadband Group

cc: Office of the Governor

The Monadnock Broadband Group is an informal coalition of municipal officials, practitioners and other stakeholders with interest in understanding and coordinating relative to broadband issues in Southwest NH. Staff support for Monadnock Broadband Group is provided by Southwest Region Planning Commission. For more information, contact Henry Underwood at hunderwood@swrpc.org or (603) 357-0557.