

**State of NH Broadband Equity, Access & Deployment (BEAD) Program**  
**Public Comment Period**  
**Southwest Region Planning Commission**

**BEAD Initial Proposal Volume I Comments**

**Community Anchor Institutions (page 6)**

- Section 1.3.2 states that “all eligible community anchor institutions” are included. However, an analysis of the data shows that some communities in Southwest NH do not have any community anchor institutions specified. This is the case for the towns of Dublin and Sharon. It is essential to consider a process to allow additional CAI locations to be included. Please consult the New Hampshire Broadband Mapping and Planning Program database of community anchor institutions to supplement the current list of eligible entities.
- A plan or program that will enable the acquisition of computer hardware and software at reduced pricing for Affordable Connectivity Program (ACP) households and CAI points is essential to providing the program goals to its participants. Infrastructure without access seems to miss the point of the Rural Bipartisan Infrastructure Law.<sup>1</sup>

**NH Senate Bill 170 (page 13)**

Background

Since 2019, most Southwest NH towns have taken advantage of NH RSA 33-3g to bond for the buildout of fiber broadband infrastructure in their communities. Many communities in Southwest NH felt that they had no choice but to act if they were to be able to attract a workforce and be competitive in the real estate markets, as many buyers consider having high-speed internet to the home as a “must have.” The municipal bonds (~\$20 million) and associated the monthly infrastructure supplemental charges (~\$8-\$14 monthly) represent an added cost burden and lack of eligibility for BEAD funding.

Comment

Digital equity for existing network users is critical. Proactive communities should not be left out from the benefits of the State’s BEAD program. There is a need in these communities to address digital equity and the BEAD program should be designed to benefit, not penalize, these forward-thinking communities.

**BEAD Initial Proposal Volume II Comments**

**Broadband Affordability Key Performance Indicator (page 7)**

- A well-known management axiom applicable to projects such as BEAD is “you can’t manage what you can’t measure.” A concern arises in reviewing the State plan concerning how digital equity penetration and participation will be tracked and measured to determine success. Simply tracking ACP subscribers would seem to miss a potentially large population that would be served by CAI or other public

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<sup>1</sup> <https://www.whitehouse.gov/wp-content/uploads/2022/04/BIL-Rural-Playbook-.pdf>

institutions and programs set up to serve the LMI population. An example of this is a community senior center where the LMI population is provided a broad range of services, including access to computers and support, without having their accounts with local ISPs.

- Consider a key performance indicator to assess affordability based on the cost of services offered.

#### **Local, Tribal, and Regional Broadband Planning Processes (page 10)**

- Sites that may be served by cable or wireless technology may be better served in the long term by optical fiber installations. How will oversight occur to ensure both short- and long-term goals are met?

#### **Speed of Network and Other Technical Capabilities (page 42)**

- Network speed has an exceptionally low point value – which could lead to less desirable technologies being installed in the name of cost savings.
- In many other cases, a smartphone is the main (or only) communications device that the LMI population can afford, and having a phone is considered essential. The lack of cellular infrastructure inclusion in the plan stands out as a significant deficiency. These cellular plans should be ACP eligible, and implementation of support programs should be strongly considered.
- 5G cellular should be included as an implementable technology, especially in rural high-cost areas. There would seem to be the opportunity to coordinate and utilize the simultaneous build-out of the Statewide AT&T FirstNet Public Safety infrastructure initiative to potentially serve some of the most rural, Extremely High-Cost locations on this network.

#### **Local Coordination (page 27)**

- The inclusion of incarcerated individuals (i.e., County Departments of Correction) will offer exceedingly difficult security issues. How is this being addressed?
- Many other populations listed may need extensive and initial training, support, and ongoing assistance to participate and use this technology. How will this be provided?

#### **Remaining Unserved BSLs (page 39)**

- What technologies constitute a “non-reliable support program” Is this a reference to technology such as DSL?

#### **General Comments**

- The program, including the challenge process must be compatible with municipal capacity to participate. Consider appropriate measures such as technical assistance to enable their participation.
- Our understanding is that the ACP program will run out of funding in 2024. Consider an additional measure relative to improving access for low-income households in addition to ACP enrollments.