**Kansas Broadband Acceleration Grant:**

**Crazy Communications’ Response to Public Comment by IdeaTek Telcom, LLC**

*February 9, 2021*

Crazy Communications submits this response to the Public Comment submitted by IdeaTek Telcom, LLC (“IdeaTek”), dated January 29, 2021, which was in regard to Crazy Communications’ proposal to the Broadband Acceleration Grant.

IdeaTek, a competitor in the same portion of the state, opposes Crazy Communications application for grant funds for three purported reasons. Those stated reasons, and Crazy Communications’ reply to each, is set forth below.

1. *Crazy Communications, by its own most recent 477, admits to already providing service at 25 Mbps download/25 Mbps upload levels or higher throughout the entire service area it wishes to deploy fiber.*

**Reply:**

**FCC 477 data breaks down information by census block. It is not truly representative of every residence or even group of residence within that area. If grants are awarded going strictly by FCC 477 data, citizens of this State will be overlooked for service. This is why the published guidance on these Public Comments states, “Comments regarding” areas proposed to be served, construction underway in proposed areas, and the impact of planned builds, “must include supporting evidence and documentation *and include information beyond FCC data*.” (Emphasis added). Here, IdeaTek ignores that admonition and cites exclusively to FCC data to support its objection.**

**Not every residence in the proposed service area can receive adequate (25/3) wireless service. Fiber infrastructure must be laid for each residence in this area to receive broadband internet service. The landscape in this area is one of the primary obstacles to wireless service. There are obstructive hills, 60-foot-tall Cottonwood trees and other structures that simply block wireless service to homes. There is no substitute for fiber in the proposed area.**

1. *The proposed deployment is entirely covered by IdeaTek’s recent CERG deployment and offers speeds of 100 Mbps download/10 Mbps upload speeds. This section was served under the terms of the IdeaTek CERG grant #54. Funding this area would be a duplication of state broadband funding efforts.*

**Reply:**

**Notice that in its first objection (above), IdeaTek asserts that Crazy Communications already provides service at 25/25 “throughout the entire” proposed service area. Now, with this objection, IdeaTek points out that *it received a recent grant of state funds (CERG grant #54) to cover the same service area, with the same type of service*, i.e., wireless. Why did IdeaTek receive CERG grant # 54 if Crazy Communications provided service “throughout the entire” proposed service area? In any event, as explained in Reply #1 (above) wireless service cannot provide service to every home in the proposed service area.**

***See* attached *Statement Concerning Coverage for Proposed Area of Service* by Crazy Communications engineer Matt Ahlstedt and supporting images.**

**Funding Crazy Communications’ proposal for this area would *not* be a duplication of the state’s broadband funding efforts.**

1. *The Southern section of this proposed area is served by both Crazy Communications and Cox Communications. IdeaTek is well aware of this area and has surveyed this small group of homes for service. While there is in fact service interest due to generally poor customer service of Cox Communication, it is covered by cable modem services indicated to be up to 1000mbps/ 35mbps in FCC 477 data.*

**Reply:**

**There are at least two problems with this objection. First, it points out only “[t]he Southern section of the proposed area” is served by Crazy Communications and Cox. Grant criteria do not consider an area to be served unless “all residential customers in the defined area” are served. Second, IdeaTek’s objection here relies almost exclusively on FCC 477 data for the claim that the area “*is covered by cable modem services indicated to be up to 1000mbps/ 35mbps*.” As explained earlier, this data is not a reliable indicator that every citizen in this area has coverage available to them.**

**We say that IdeaTek “almost exclusively” relied on FCC 477 data because, to be sure, they did include a *single* picture of a *single* speed test taken at a *single* address “7106 N. Madison St., Hutchinson, KS.” There is no explanation of how this proves the necessary level of service to the entire service area proposed to be served by fiber by Crazy Communications. This “support” is really no support at all.**