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May 2, 2022

Dr. Tamarah Holmes

Director

Office of Broadband

Virginia Department of Housing and Community Development

600 East Main Street, Suite 300

Richmond, VA 23219

Dear Dr. Holmes:

I write to you on behalf of the Virginia Association of Counties (VACo) to respectfully submit comments on the draft Virginia Telecommunications Initiative (VATI) Program Guidelines and Criteria for FY 2023 grant applications. We appreciate the unprecedented investment in state and federal funds during the FY 2022 cycle and the continued state support for the FY 2023 cycle to extend broadband services to areas presently unserved. VACo strongly supports the efforts of the Commonwealth to help build the necessary telecommunications infrastructure to deploy universal affordable access to the internet for all areas, particularly in underserved and rural areas.

VACo is supportive of guidelines that provide additional tools and flexibility for counties to finance, build, and operate open access networks in partnership with commercial internet service providers. To that end, the proposed change to make the one-year pilot program in which public broadband authorities may apply directly for up to 10 percent VATI funds without investment from the private sector a permanent feature of the program is greatly appreciated. We are appreciative of the recognition that there will be times when the most cost-effective solution will involve local governments building, owning, and operating parts of broadband infrastructure.

Similarly, we support establishing a definition of broadband based on the federal standards for speed as internet service at or above 100 megabits per second (Mbps) download and 20 Mbps upload. As the pandemic has demonstrated, the ability to effectively engage in remote work, learning, and other features of internet use such as streaming is dependent upon speeds higher than the current unserved area definition of 25 Mbps download and 3 Mbps upload. We should be encouraging the installation of infrastructure capable of delivering these higher speeds. However, VACo is also supportive of the proposal to prioritize unserved areas facing the lower threshold in the application scoring process.

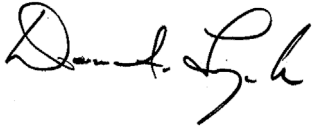
VACo also supports proposed changes to percentages of allowable overlap on a wireless project if a proposed area contains 25% or less of serviceable units that have access to service with no additional special construction costs from the provider as of the date of the application and similarly for wireline projects if a proposed area contains 20% or less of serviceable units under similar conditions. We feel that allowing higher percentage of overlap can encourage a greater number of service options, leading to more end user choice as well as better service quality and affordability.

Lastly, we support the proposed ability for units of local government to submit multiple applications with different service providers, including project areas that cross jurisdictional boundaries. This should increase the ability of local governments to secure private sector partners and engage in regional projects that hopefully increase cost-efficiency and achieve maximum coverage. To that end, the proposed change to make available by request funds

awarded through the VATI grant making process to cover administrative costs up to 10% of the total grant request will hopefully allow for local governments to undertake more ambitious and cost-effective proposals.

Thank you for your consideration of these comments. We look forward to continuing to work with you and the Commonwealth Connect Coalition on this program and other ways in which to improve access and affordability to broadband in Virginia.

Respectfully,

A handwritten signature in black ink, appearing to read "Dean A. Lynch". The signature is fluid and cursive, with the first name "Dean" and last name "Lynch" clearly distinguishable.

Dean A. Lynch, CAE
Executive Director
Virginia Association of Counties

cc: Bryan Horn, Director, Virginia Department of Housing and Community Development
Members, VACo Board of Directors