

Idaho Office of Broadband Application Project Area (APAs) Public Comments

Scott Draper (PMT)

APA 1022 | Project Mutual Telephone Assc. Inc. (PMT) is interested in breaking up APA 1022 into a smaller segment. PMT is interested in the area north of I-84 due to this being adjacent to existing ILEC territory and adjacent to a project that will be completed in 2025. Removing this smaller area of APA 1022, PMT can include this area build and include existing facilities to service this area with fiber.

APA 1020 | Project Mutual Telephone Assc. Inc. (PMT) is interested in breaking up APA 1020 into a smaller area. PMT is interested in the section of APA 1020 that encompasses the community of Kimberly. PMT is currently working with the City of Kimberly to provide fiber services within the designated project area within the city limits. PMT has fiber facilities in the area and is looking to expand throughout the City of Kimberly. PMT currently provides fiber services to Family Health Services within the city of Kimberly.

Josh Frieboes (Airbridge)

1051/1081 | I think these two areas should be combined. Maybe all of Idaho county off of the reservation should be one area?

Valerie Fast Horse

1056 | Census blocks within Project Area 1056 should be Un-clustered to allow smaller project areas to be drawn.

Custer Telephone Cooperative, Inc.

1130 | Include census block 160379602001151 in project area 1000. These BSL's are within the Custer Telephone ILEC serving area. Specifically, the 4 BSL's in this CB located on Westfork Ln and the 4 BSL's at the Junction of HYW 75 and Yankee Fork Road should be part of the Yankee Fork Road build that is in project area 1000.

1000 | Include census block 160379602001181 in project area 1142. This BSL is within the Custer Telephone ILEC serving area that is served by the wirecenter on the South side of the Salmon River.

1000 | Include census block 160379602001139 in project area 1142. This BSL is within the Custer Telephone ILEC serving area that is served by the wirecenter on the South side of the Salmon River.

1130 | We want to make the IOB aware the following BSL's along the Salmon River are served from the Custer Telephone ILEC wire center on the South side of the Salmon River. Fiber engineering plans are complete and pending funds to build. If possible, we request these locations be added to Project Area 1142

	1383057621	1124226016	1124225935	1124229956	1124226825
	1124227119	1124230687	1124224666	1124224428	1124224940
	1383057620	1124230760	1124224509	1124224633	

1129 | Include census block 160599703003069 in project area 1000. These BSL's are within the Custer Telephone ILEC serving area and are currently served with fiber infrastructure.

1129 | Include census block 160599703003142 in project area 1000. These BSL's are within the Custer Telephone ILEC serving area and are currently served with fiber infrastructure.

1129 | Include census block 160599703003156 in project area 1000. These BSL's are within the Custer Telephone ILEC serving area and are currently served with fiber infrastructure.

1129 | Include census block 160599703003154 in project area 1000. These BSL's are within the Custer Telephone ILEC serving area and are currently served with fiber infrastructure.

1129 | Include census block 160599703003151 in project area 1000. These BSL's are within the Custer Telephone ILEC serving area and are currently served with fiber infrastructure.

1129 | Include census block 160599703003147 in project area 1000. These BSL's are within the Custer Telephone ILEC serving area and are currently served with fiber infrastructure.

1129 | Include census block 160599703003150 in project area 1000. These BSL's are within the Custer Telephone ILEC serving area and are currently served with fiber infrastructure.

Idaho Office of Broadband Application Project Area (APAs) Public Comments

Custer Telephone Cooperative, Inc. (cont.)	
1129	Include census block 160599703003159 in project area 1000. These BSL's are within the Custer Telephone ILEC serving area and are currently served with fiber infrastructure.
1129	Include census block 160599703003148 in project area 1000. These BSL's are within the Custer Telephone ILEC serving area and are currently served with fiber infrastructure.
1129	Include census block 160599703003062 in project area 1000. These BSL's are within the Custer Telephone ILEC serving area and are currently served with fiber infrastructure.
1129	Include census block 160599703003055 in project area 1000. These BSL's are within the Custer Telephone ILEC serving area and many are currently served with fiber infrastructure.
1129	Include census block 160599703003030 in project area 1000. These BSL's are within the Custer Telephone ILEC serving area and within our planned build area.
1129	Include census block 160599703003176 in project area 1000. These BSL's are within the Custer Telephone ILEC serving area and within our planned build area.
1005	Include census block 160599703003171 in project area 1000. These BSL's are within the Custer Telephone ILEC serving area and within our planned build area.
1005	Include census block 160599703003176 in project area 1000. These BSL's are within the Custer Telephone ILEC serving area and within our planned build area.
1005	Include census block 160599703003030 in project area 1000. These BSL's are within the Custer Telephone ILEC serving area and within our planned build area.
1005	Include census block 160599703003179 in project area 1000. These BSL's are within the Custer Telephone ILEC serving area and within our planned build area.
1005	Include census block 160599703003168 in project area 1000. These BSL's are within the Custer Telephone ILEC serving area and within our planned build area.
1005	Include census block 160599703003180 in project area 1000. These BSL's are within the Custer Telephone ILEC serving area and within our planned build area.
1005	Include census block 160599703003181 in project area 1000. These BSL's are within the Custer Telephone ILEC serving area and within our planned build area.
1005	Include census block 160599703003173 in project area 1000. These BSL's are within the Custer Telephone ILEC serving area and within our planned build area.
1005	Include census block 160599703003074 in project area 1000. These BSL's are within the Custer Telephone ILEC serving area and within our planned build area.
1005	"Include census block 160599703003077 in project area 1000. These BSL's are within the Custer Telephone ILEC serving area and within our planned build area."
1129	Include census block 160599703003174 in project area 1000. These BSL's are within the Custer Telephone ILEC serving area and within our planned build area.
1005	Include census block 160599703003168 in project area 1000. These BSL's are within the Custer Telephone ILEC serving area and within our planned build area.
1129	Include census block 160599703003170 in project area 1000. These BSL's are within the Custer Telephone ILEC serving area area and within our planned build area.
1129	serving area and are currently served with fiber infrastructure. (all locations will show served with 12/31/2024 reporting)
1129	serving area and many are currently served with fiber infrastructure. (all locations with show served with 12/31/2024 report)

Idaho Office of Broadband Application Project Area (APAs) Public Comments

Patrick Whalen (Intermax)	
1071	location id 1310568861 is a lone green dot (underserved) in a residential neighborhood. The rest of the neighborhood is "served". This one should be removed from the project area, please.
1070	location id 1310626206 is a lone summer cottage on an island in Spirit Lake. There is no practical way to serve it with fiber or fixed wireless. Can it be removed from the project area?
1065 and 1067	locations 1042343765, 1383200914, 1413319458, 1042364153 are across the river from the rest of the polygon and thus very remote from that project but are right on top of the build to serve Project Area 1067. Please consider moving them from Project Area 1065 to Project Area 1067
1070	Project Area 1070, location id 1042351289 is isolated, a long way from anything else in the polygon. It is however adjacent to a neighborhood of "served" homes. To serve this lone location approximately 10 miles of fiber would need to be constructed through already served areas. We think the location should be removed from the project area.
1070 and 1071	Project Areas 1070 and 1071, both projects have locations immediately south of Spirit Lake, but the road system to serve them comes from the south (Project Area 1071). The state will save a lot of money if all of these locations moved to Project Area 1071 and removed from 1070. Location id(s): 1310621177, 1310621178, 1310621176, 1310600190, 1413349590, 1310600185, 1310600186, 1488820653, 1310585571, 1310585509, 1310585534, 1413349541, 1413349540, 1413349612, 1310585523, 1413349542, 1310585552, 1310585237
1120	location id 1413348084 appears to be the bathrooms at a public boat launch. Should it be removed from the project area?
1140 and 1120	location id 1310634193 is a remote orphan for project area 1140 but would fit with project area 1120. Please consider moving it from 1140 to 1120
1140 and 1056	the locations in project area 1140 along Francis Faire Road (1413350022 and 5 others) are best served from project area 1056 since that project will build along Francis Faire Road anyway.
1140	location id 1310606560 is served by a road from Washington. It is not a good location for fixed wireless or fiber. Perhaps a satellite? If it remains in the project area, it will be a very, very expensive build. Can it be removed?
1140 and 1056	Project Area 1140, locations: 1310606559, 1310606557, 1310616112, 1310616114, 1310616113, 1413350022, 1413350022, 1383311259, 1383311258, 1383311257, 1310617212 all should be served by Project Area 1056. If served from Project Area 1140 approximately 7.5 miles of fiber would need to be built and approximately 5.5 miles of that fiber would be built across already served locations within 1056. The state might save a lot of money by moving them to project area 1056.
1120	Project Area 1120, location id 1310632783 is incredibly remote and doesn't seem to be connected to Idaho via a roadway (it may be accessible from Washington). Hard to see any way to provide them with bandwidth – can it be removed from the project area?
1120 and 1140	Project Area 1140, location id 1310619110, is remote and is served by a road coming from project area 1120. The state may save a lot of money by moving it to project area 1120.

Zipty Fiber

1143	This Project Areas would be attractive for FttP if we are allowed to select census blocks but the whole is simply too large for a FttP solution.
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Pacific Cabinets Inc.

1112	Businesses and communities on the edge of the reservation are not likely to be a primary focus of the large area grouped within the tribal reservation. Communities like Ferdinand would be better grouped into a project area with Cottonwood or it's own regional area.
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Idaho Office of Broadband Application Project Area (APAs) Public Comments

Ken Bock - ClearConnect

1081

The APAs across ID are problematic. Particularly in Idaho County. Most APAs span many square miles and include cities, uninc communities, and single serve locations that aren't in close or are very remote. The proposed APAs will require the use of multiple techs (fiber, wireless, satellite, etc.) in the same APA—driving costs, forcing collabs of competitive ISPs (leading to no bids for APAs because partnerships can't be forged), reducing the potential ROI for ISPs (who then choose not to submit a BEAD app).

A solution would be to define them by types of broadband capable in the area, recognizing that it is impractical and cost prohibitive to provide fiber to remote, singular locales. Here are suggested individual defining parameters:

1. Incorporate cities and anchor institutions— these could have a ½- to 1-mile radius buffer for adjacent development
2. Service locations could be served by microwave (i.e.: unincorporated communities).
3. Locations that can only be served by satellite.

1081

There have been significant changes to the Final Determination map that have rendered both Grangeville and Whitebird ineligible for BEAD funding for last-mile connections. Grangeville and Whitebird are not anticipated to receive any last-mile fiber to the premise connections from the IRON broadband project, the Port of Lewiston project, or the DIGB2 fiber project. Those projects are focused on providing a middle-mile backbone to facilitate future last mile connections. If these locations (and others like them) are considered “served” by NTIA, it will render them ineligible for other federal funding opportunities that could be used to provide important last-mile connectivity.

Christine Frei

State of Idaho

I would expect that the project areas that are mapped will likely remain as is with slight adjustments. That being said, I am doubtful that the most difficult project areas are going to be bid on because they require multiple types of broadband technologies and will require partners to provide 100% coverage. It also will make deployment of the infrastructure much more expensive. I think it would have been much better to have delineated project areas by type of technology anticipated for the terrain and the population (satellite, fixed wireless, or fiber). This would keep project areas more competitive and would be a much better use of grant funding. It will be interesting to see if the State of Idaho can accomplish 100% service coverage with the existing project areas as defined.

Project Areas 1051 & 1081

The service locations identified for Grangeville and White Bird on this APA map make most of both incorporated communities ineligible for BEAD funding. There has been a mapping change on the Final Determination map with the APA now. As the State Broadband office is aware, the eligibility appears to have changed after December 6, 2024 when I took screen shots of both maps.

This issue was brought to the attention of the Idaho Office of Broadband on December 16th. The office believes that it was a "blip" in time. However, those of us working with Idaho County are very aware that the eligibility had changed after the Challenge Process and then changed after December 6, 2024.

No logical explanation of how the State of Idaho has gotten to the ineligibility of these communities has been provided to date. We look forward to a response in the near future. Grangeville and White Bird have a right to clarification and change if there is an error.

Custer Telephone Cooperative, Inc.

1047

We recommend including census block 160599701001051 in project area 1136. Based on our experience, the BSL's in this CB would likely be served from the fiber infrastructure that will be built for project area 1136.

1047

We recommend including census block 160599701001028 in project area 1136. Based on our experience, the BSL's in this CB would likely be served from the fiber infrastructure that will be built for project area 1136.

Idaho Office of Broadband Application Project Area (APAs) Public Comments

ATC Communications	
1082	The cluster of CBG's in the SW corner of APA 1082 (near CBG160719601001270) would be better suited for APA 1025. Those BSL's are geographically closer to those BSL's in 1025 and our nearby existing network feeds that area from the West, not the East (Stone, ID). I can understand why it was split that way, since it is Oneida County. But if you follow exchange boundaries (or Study Area boundaries) you'll see why it would be ideal to have those moved to 1025.
1022	interstates serve as effective natural boundaries, as they can be costly to cross and may introduce delays in permitting processes. By excluding these areas, we aim to streamline operations and ensure a more efficient permitting process.
1160	highly sensitive and top-secret land of the Idaho National Laboratory (INL). Not only is this site already served by two redundant providers (from the south and the north), but delivering service to these locations would be nearly impossible due to the unique ownership of the land. Additionally, the INL already has its own fiber infrastructure within its site, making external service delivery unnecessary. At a minimum, it should be separated out into its own APA.
1160	All locations near Atomic City (near 160119503001040) should be part of APA1028. Those locations are MUCH closer the Blackfoot area than Arco. Plus, building from Atomic City to Arco would require going across INL ground, which would introduce significant delays in construction due to permitting delays.
1002	We would like to bring to your attention that several locations in APA 1002, while identified as eligible, are situated on highly sensitive and top-secret land of the Idaho National Laboratory (INL). Not only is this site already served by two redundant providers (from the south and the north), but delivering service to these locations would be nearly impossible due to the unique ownership of the land. Additionally, the INL already has its own fiber infrastructure within its site, making external service delivery unnecessary. At a minimum, it should be separated out into its own APA. The locations in question are the most eastern locations in APA 1002. As stated in another challenge, we believe all locations within INL should be their own APA - but will most likely (eventually) be identified as already served.
1002	We believe BSL 1413332820 should be included in APA 1001 as it would be nearly impossible to traverse that entire mountain range to serve one single customer. It would be easier to serve from the West.
1154	We would like to request that all locations within the CBGs listed below be split out into their own APA. These locations are unique and significantly different from the rest of the APA. The homes are located in the backcountry of Idaho and are primarily accessible only during the summer months, as the roads are not maintained during the winter. Additionally, the homes are surrounded by National Forest, and permitting will be a limiting factor for any provider looking to serve these areas. It would be detrimental to group these locations with the Mackay BSLs, and we strongly believe they deserve their own APA to better reflect their unique challenges. 160379602004164 160379602004202 160379602004200 160379602004189 (partial)
1025	Note: This is a general observation and not specifically related to this APA. In my opinion—and the opinion of many of my peers—the State would benefit significantly from reducing the size of APAs and, consequently, creating more than the 163 proposed areas. I encourage the IOB to carefully analyze the potential trade-off between the increased workload of doubling the number of APAs and the risk of providers choosing not to participate due to the large size and associated costs of the areas. Since the State is required to secure applications for all BSLs, we believe that, in the long run, more time might be spent convincing providers to participate and submit applications than would be saved by maintaining fewer, larger APAs. For example, Louisiana recently announced funding for 1,853 project areas. By keeping APAs large, Idaho risks limiting participation to only larger providers, potentially falling short of achieving the desired outcomes.

Idaho Office of Broadband Application Project Area (APAs) Public Comments

Cox Communications

- APA 1017**
- Two locations (1413344786 & 1413318085) are approximately 17 road miles from the nearest grant-eligible location, situated within the Craters of the Moon National Monument, where builds/trenching are unlikely. These locations are likely sheds or livestock watering troughs.
 - Two locations (1110593604 & 1110598325) require approximately 8 road miles of trunking to the nearest grant-eligible location, with about 3 miles along unpaved roads.
 - Nine locations (1110593406, 1110593503, 1110593546, 1110594269, 1110598239, 1110598413, 1110599890, 1110600854, 1413318084) would require approximately 21 road miles through rough terrain.
 - It may be more practical to include the 29 easternmost Census Blocks in Project Area 1161 within Project Area 1017.

No Structure	Non-Residential Structures
1110601088	1110595607 Does not appear to be residential.
1413318458	1463386658 Shed.
1110591931	1110595086 Non-residential located on a private road.
1413318062	1413318144 Non-residential located on a private road.
1413318391	1413318061 Garage.
1463386088	1110601883 Stands restrooms and concession area for a baseball field.
	1413318204 Ski lift endpoint.
	1110606446 Barn/shed.

Currently Served Locations	Sun Valley Mountain (All Currently Served)	4-H / Religious Summer Camps	New Developments (In Process of Being Served by Fiber Build)
1110599797	1110592326	1110591306	1463383073
1110596883	1110600813	1110591315	1463383076
1110598283	1110601437	1110591332	1463383079
1110594667	1413318386	1110591333	1463383403
	1413318388	1383259694	1463383657
	1413318389	1383259695	1463384399
		1383259698	1463384402
		1383259699	1463389610
			1463389639

Build Recommendation: Location ID 1041881513: It may make more sense to include this location in Census Block 160639501002086 with locations in Gooding County. This site is approximately 12 road miles from the nearest grant-eligible location in this project area.

Non-Residential Structures	No Structures
1041881769 Shed	1041882405
1041882069 Barn	1413318353
1041882683 Shed	
1041880916 Shed	
1041881036 Shed	

APA 1130 Regarding the dispersed locations in this area, building and grouping remain a challenging proposition with no clear anchor point. It may make more sense to merge these locations with the adjacent Project Area 1000. While this adjustment would bring Project Area 1000 to over 400 locations, it would make the build more feasible and reasonable

APA 1160 ARCO, Idaho: Building to numerous locations in radioactively dangerous areas is not advisable. Eastern Blaine County: One location is approximately 30 road miles from the rest of the locations.

Idaho Office of Broadband Application Project Area (APAs) Public Comments

Cox Communications (cont.)

APA 1134	Location IDs 1110593895, 1110598052, 1110602277, 1413318281 in Census Blocks 160139601021099, 160139601021110, and 160139601021104 would require a 12-mile trunk build to connect to the nearest grant-eligible locations. Could these Census Blocks potentially be merged with eligible location Census Blocks in Camas County?
APA 1134	<p>Barns: 1110594379, 1110599333, 1110594388, 1110595530 Quonset Hut (Road Salt Storage): 1110591291 Sheds: 1413318186, 1413318187, 1110592832, 1463389779, 1110594406, 1110593510, 1110592324, 1110610552 Duplicate: 1110611715 (duplicate of 1110611714) Quonset Hut Garage: 1110593404 Farm Outbuildings (with possible BSLs): 1110599988, 1383252768, 1110594289, 1383252766, 1383252767 Covered Garages and Kennels: 1383251580, 1383251581, 1383251584 No Structure: 1413318340, 1413318185, 1110602742 Outbuildings at Landscaping Company: 1110592017, 1110595116, 1413318256 Self-Storage Sheds: 1413318351, 1413318356, 1463389874 Barn and Cattle Feeding Troughs: 1110600497, 1110600776, 1383252047, 1383252048, 1383252274, 1383252285, 1413318167 Quonset Hut Storage Shed: 1413318284 Barns: 1110599044, 1110597673, 1383257666, 1383258190 Sheds: 1413318281, 1413318265</p>
APA 1161	<p>Census Blocks Merge: It may make more sense to include the 29 easternmost locations in Project Area 1161 with Project Area 1017 for build and grouping purposes. Census Blocks and Location IDs: 160139601011031: 1110592755 160139601012073: 1110594273 160139601011036: 1110593168 160139601012074: 1110596054 160139601011039: 1110594054 160139601012079: 1110596249 160139601012072: 1110594101 160139601012082: 1110596858, 1110599416, 1110599451, 1110600121, 1110600204, 1110600406, 1110600442, 1110601309, 1110601696, 1110601936, 1110608885, 1110611818, 1383253375, 1383254723, 1383254724, 1383254770, 1383254771, 1383254772, 1383254773, 1383255899, 1413318193, 1413318194 Location ID 1110592000: Requires a 4-road-mile build to the nearest grant-eligible location.</p>
APA 1161	<p>Non-Residential Structures: Silos: 1110600121, 1110592796, 1383252567 Barns: 1110593206, 1413318190, 1413318192, 1110598357, 1383252556, 1110598764, 1110592822, 1110600178, 1413318277 Garages: 1110601869, 1110600236 Sheds: 1110595168, 1110594860, 1110600479, 110602238, 138325283, 1110602242, 1110598612, 1110593100, 1110595814, 1110593457, 1110601117, 1383252937, 1383252939 Other Notes: Non-Discrete Residences: 1110598103: Appears to be a garage or an addition to a house. 1413318376: Does not appear to be a residence or business. Storage Quonset Hut: 1110591314</p>

Idaho Office of Broadband Application Project Area (APAs) Public Comments

Syringa Hospital

1081 The eligible service locations within the cities of Grangeville and White Bird should be those mapped on the Final Determination Map. The BEAD APA Map is not accurate and reflects ineligibility from before the challenge process and map revisions. Is this return to ineligible status a mapping error? Changing eligibility from the Final Determination map is a disservice to these communities that really need broadband service.

1051 The project areas (APAs) across the State of Idaho are problematic. This is particularly true in Idaho County. Most of the APAs span many square miles and include municipalities, unincorporated communities, and single service locations that are not in close proximity and/or in extremely remote locations. The proposed APAs will require the use of multiple technologies (fiber, wireless, satellite, etc.) in the same APA—driving up costs, forcing collaboration of competitive ISPs (leading to no bids for the APAs because partnerships can't be forged), and reducing the potential ROI for ISPs (who then choose not to submit a BEAD application).

1051 A solution to improve the APAs would be to define them by probable type of broadband capability/service in the area, recognizing that it is impractical and cost prohibitive to provide fiber to remote, singular locations. The following are suggested individual defining parameters:

1. Incorporated cities – these could have a ½- to 1-mile radius buffer for adjacent development and include community anchor institutions and major businesses/employers located outside city limits. (These areas could likely be served with fiber.)
2. Areas where service locations could be served by microwave (i.e.: unincorporated communities).
3. Locations that can only be served by satellite.

By approaching the project areas in this way, funding can be more effectively and efficiently distributed, incentives for competitive bids are increased, and undesirable, no-response APAs are minimized. This structure prioritizes services and locations to promote maximum economic benefits.

Polydamas LLC

1112 The North Idaho Coalition is preparing a Public Private agreement with a few local ISPs who have expressed interest in working to ensure the entire region is served. We would like to enforce, provide a letter of support, for the Nez Pierce Tribal Internet, as they chose their area of focus. We would like to adopt and incorporate the Peck and Western Orofino area on tribal land if they elect not to connect those BSLs.

Fremont Telcom Co. DBA Blackfoot Communications

	Move CB 160439701001721				
Blackfoot Communications Service Area	160439701001827	160659501022049	160659504021085	160659504021095	160439703014070
	160439701001815	160659501022102	160659504021150	160659504021122	160439703013053
	160439703014055	160659501022107	160659504021086	160659504021123	160439701001726
	160439703014069	160659501022106	160659504021087	160659504021187	160439702001157
	160439703014054	160659501022104	160659504021088	160659504021201	160439701001594
	160439703014068	160659504021070	160659504021089	160659504021130	160439701001607
	160439703014067	160659504021051	160659504021090	160659504021131	160439701001596
	160659501022018	160659504021050	160659504021147	160439702001159	160439701001604
	160659501022012	160659501022117	160659504021142	160439702001073	160439701001613
	160659501022048	160659501022116	160659504021169	160439702001000	160439701001745
	160659501022009	160659504021049	160659504021172	160439703014071	160439701001746
	160659501022008	160659504021060	160659504021173	160439703014045	160439701001747
					160439701001752

Idaho Office of Broadband Application Project Area (APAs) Public Comments

Direct Communications	
1026	Location ID 1413346564 is a dead tree on a mountainside. Location 1413346577 is a rock outcropping in the middle of a field. Google image date 8/13/2024
1028	Atomic City should be added to APA 1027 due to geographic proximity. 3 BSLs located off Highway 20 should be added to APA 1029 They cannot be reached from the rest of the PSA due to restricted federal property access
1029	3 BSLs located off HWY 20 in APA 1028 should be added to this APA. These 3 BSLs would require a build across restricted Federal Property from APA 1028 but share a common highway access with this APA
1030	BSLs north of the Snake River should be added to APA 1029. This would allow them to be built without requiring a river crossing.
1035	Location IDs 1413312060,1413312058, 1413323359 are rock out croppings in fields. Location ID 1413323361 is a clump of trees in a field. Google Image Date 10/6/2023. This APA should be split into two pieces using the mountain range as a natural divider. Points on the eastern side of the mountain should be added to the eastern half of APA 1041 to form a new APA. These BSLs all share common highway and geographic access.
1036	This APA should Be split into 2 APAs. BSLs south of Direct Communications Community Connect Award enforceable commitment should be a new APA with the BSLs North of that enforceable commitment being added to the points east of the mountain range in APA 1035 to create an APA covering the GEM Valley. These points would then cover shared geographical areas and common highway access.
1037	This APA should Be split into 2 APAs. BSLs south of Direct Communications Community Connect Award enforceable commitment should be a new APA with the BSLs North of that enforceable commitment being added to the points east of the mountain range in APA 1035 to create an APA covering the GEM Valley. These points would then cover shared geographical areas and common highway access.
1038	Location ID 1413323349 is a shallow pond. Location 1413332435, 1413332442 are clumps of trees. Google image Date 09/13/2024. This APA should be divided at Thatcher into two stand alone APAs to accommodate geographic divisions created by mountain canyons and Bear river.
1040	Location 1413316943 is a mountain pond. Location 1100337629 is a barn and grain silos. Location 1100335110,1413317016 are an empty spots in the middle of fields.
1041	Locations 1292274974, 1413312059 should be moved to APA 1037 to accommodate shared road access. APA should be divided along the mountain range with the BSLs east of the mountains added to APA 1037. BSLs west of the mountains including Lava Hot Springs area remaining in APA 1041. This will allow a common geographic and road access.
1043	combined with the BSLs in area inclusive of Nounan and the BSLs southeast of Nounan in APA 1159. BSLs in APA 1159 northwest of Georgetown Summit should combine with the northwest points in APA 1043. This will allow for shared geographic and road access. This will also allow the City of Soda Springs to be in one APA and not divided in two
1159	combined with the BSLs in area inclusive of Nounan and the BSLs southeast of Nounan in APA 1159. BSLs in APA 1159 northwest of Georgetown Summit should combine with the northwest points in APA 1043. This will allow for shared geographic and road access. This will also allow the City of Soda Springs to be in one APA and not divided in two

Idaho Office of Broadband Application Project Area (APAs) Public Comments

Farmers Mutual Telephone Company

1100	<p>PROJECT AREA- 1100 Census Block: 160759603011047 Inside this Census Block, there is only (one) Unserved/Underserved location, and that location has been challenged by FMTC as a current fiber optic customer. This location has had fiber optics since May of 2022. The entire Census Block should be removed from APA-1100. Thank you, Blake</p>
1100	<p>PROJECT AREA-1100 Census Block: 160759603011052 Inside this Census Block, there is only (one) Unserved/Underserved location, and that location has been challenged by FMTC as a Non-BSL location (Accepted on 9/4/24 on the FCC National Broadband Map). This location is a Hay Barn. This location is a Secondary structure. The entire Census Block should be removed from APA-1100. Thank you, Blake</p>
1100	<p>PROJECT AREA-1100 Census Block: 160759603011034 Inside this Census Block, there is only (one) Unserved/Underserved location, and that location has been challenged by FMTC as a Non-BSL location. This location is a broken-down-out building. This location is a Secondary structure. The entire Census Block should be removed from APA-1100. Thank you, Blake</p>
1100	<p>PROJECT AREA-1100 Census Block: 160759603011041 Inside this Census Block, there is only (one) Unserved/Underserved location, and that location has been challenged by FMTC as a Non-BSL location. (Is not a location on the current National Broadband Map). This location is a remote shop. This location is a Secondary structure. The entire Census Block should be removed from APA-1100. Thank you, Blake</p>
1100	<p>PROJECT AREA-1100 Census Block: 160759603011063 Inside this Census Block, there is only (one) Unserved/Underserved location, and that location has been challenged by FMTC as a Non-BSL location. This location is an animal barn. This location is a Secondary structure. The entire Census Block should be removed from APA-1100. Thank you, Blake</p>
1139	<p>We would like to suggest that the BSL's on the west side of APA 1139 be included with APA 1149. APA 1139 is divided into three very different areas. This could be accomplished by splitting census block 160759601001015. The census block 160759601001015 is a big block and is divided by desert and hills. It seems the area north of Payette along the east side of Hill Rd and Ox Ranch Rd would fit better into APA 1149. It would make more sense for one provider to run up Hill Rd versus the possibility of two different providers. Thank you, Kurt</p>

Idaho Office of Broadband Application Project Area (APAs) Public Comments

Alison Tompkins

- 1112 This area should be broken down further into smaller areas that may be feasible to serve. For example, Lawyer's Canyon poses a significant barrier to traverse. Unserved population centers such as Stites and Craigmont should not be lumped with sparsely populated rural areas.
Applicable to all APAs:
- 1081 Because the APAs do not consider the vast differences in population density (population centers are lumped with sparsely population regions), multiple technologies will be required to provide 100% coverage in the same APA. This drives cost of coverage up for single provider (severely limiting or eliminating profit margins) or assumes that ISPs will collaborate to provide coverage (highly unlikely). Reconfiguration of APAs based upon 1) census tracts, and 2) population density and viable service type (broadband/microwave/satellite) would be much more feasible to construct and attractive to providers who are best-suited to provide that type of service.

Casey Forsmann

- 1081 The APA's are very large and have many challenges for trying to equally service each member. I believe trying to separate them closer to the way the highway districts are broken up would make it much more feasible to create areas that could be managed.
- 1112 The APA's are very large and would be difficult to manage providing equal service to all members. Communities like Ferdinand being grouped in with the rest of the tribal reservation are likely to be left out, or the entire area might suffer if it cannot effectively plan to reach every member. Breaking the APA's down similar to highway districts would make it easier to create areas where infrastructure is commonly serviced.
- 1051 The small community of Keuterville is broken in to two separate APA's. One is grouped with areas out to Waha and surrounding Lewiston Valley. The other is grouped with remote areas of Joseph Plans, Dumaque and White bird. It seems prohibitive for either of these areas to be effectively serviced. Breaking these into smaller sections similar to Highway district areas would make it more manageable.
- 1102 The small community of Keuterville is broken in to two separate APA's. One is grouped with areas out to Waha and surrounding Lewiston Valley. The other is grouped with remote areas of Joseph Plans, Dumaque and White bird. It seems prohibitive for either of these areas to be effectively serviced. Breaking these into smaller sections similar to Highway district areas would make it more manageable.

Jess BurnsLee

- 1015 Optimizing Idaho's Broadband Mapping Strategy with a Good, Better, Best Approach
Idaho's broadband mapping strategy must ensure clarity, competitiveness, and efficient resource use. The BEAD Program prioritizes fiber, but Idaho's geography and economic challenges require flexibility. Current maps blend areas with disparities in density and distance, hindering competitive applications.
A good, better, best approach resolves these issues:
 - Good: Use alternative technologies where fiber is impractical.
 - Better: Group areas by geography and density for mixed-tech solutions.
 - Best: Focus fiber-only projects in viable areas for future-proof results.
This strategy maximizes impact, avoids misleading applications, and ensures Idaho meets federal goals while addressing unserved and underserved areas.
- 1085 APA 1085 spans a large area and exhibits disparate BSL density. We recommend dividing this APA and strategically combining portions with APA 1084 to create several geographically cohesive APAs with improved density alignment. Suggested APAs are provided in separate comments to allow for a comprehensive listing of census blocks. Please feel free to reach out with any questions.

Idaho Office of Broadband Application Project Area (APAs) Public Comments

Jess BurnsLee (cont.)

1085	<p>In APA 1085, Block 1215 should be added to APA 1035 to improve geographic cohesion and streamline the organization of APAs.</p>
1085	<p>This comment supports a “Good, Better, Best” strategy in alignment with the overall mapping strategy letter submitted. The goal is to ensure optimized alignment of APAs for geographic cohesion, density improvement, and technology needs.</p> <p>APA 1085 spans a large area and exhibits disparate BSL density. We recommend dividing this APA and strategically combining portions with APA 1084 to create several geographically cohesive APAs with improved density alignment. Suggested APAs are provided in separate comments to allow for a comprehensive listing of census blocks.</p> <p>1085A: 3009, 3027, 2041, 2042, 3019, 3014, 3028, 2092, 2032, 1020, 2045, 3003, 2042, 3031, 3013, 3031, 1019, 2044, 3030, 3018, 3018, 2041, 3030, 2033, 3003, 3006, 3029, 3001, 3000, 3026, 2031, 3002, 3041, 3004, 3002</p>
1085	<p>This comment supports a “Good, Better, Best” strategy in alignment with the overall mapping strategy letter submitted. The goal is to ensure optimized alignment of APAs for geographic cohesion, density improvement, and technology needs.</p> <p>APA 1085 spans a large area and exhibits disparate BSL density. We recommend dividing this APA and strategically combining portions with APA 1084 to create several geographically cohesive APAs with improved density alignment. Suggested APAs are provided in separate comments to allow for a comprehensive listing of census blocks. Please feel free to reach out with any questions.</p> <p>1085_1084 Combo 1: 1316, 1288, 1317, 1330, 1290, 2019, 1314, 1312, 1344, 1304, 1301, 2052, 1326, 1319, 1540, 1307, 1299, 4027</p>
1085	<p>This comment supports a “Good, Better, Best” strategy in alignment with the overall mapping strategy letter submitted. The goal is to ensure optimized alignment of APAs for geographic cohesion, density improvement, and technology needs.</p> <p>APA 1085 spans a large area and exhibits disparate BSL density. We recommend dividing this APA and strategically combining portions with APA 1084 to create several geographically cohesive APAs with improved density alignment. Suggested APAs are provided in separate comments to allow for a comprehensive listing of census blocks. Please feel free to reach out with any questions.</p> <p>1084_1085 Combo 2: 1040, 1173, 1025, 1235, 1187, 1526, 1521, 1223, 1142, 1204, 1562, 1014, 1527, 1009, 1034, 1239, 1242, 1229, 1233, 1359, 1037, 1339, 1157, 1246, 1005, 1021, 1522, 1001, 1247, 1224, 1167, 1041, 1022, 1205, 1186, 1141, 1227, 1039, 1203, 1010, 1023</p>
1085	<p>APA 1085 spans a large area and exhibits disparate BSL density. We recommend dividing this APA and strategically combining portions with APA 1084 to create several geographically cohesive APAs with improved density alignment. Suggested APAs are provided in separate comments to allow for a comprehensive listing of census blocks. Please feel free to reach out with any questions.</p> <p>1085 B: 1249, 1246, 1131, 1040, 2003, 1198, 2040, 1134, 1242, 1043, 2041, 2028, 1349, 1250, 1177, 1248, 2006, 1099, 2014, 2005, 1196, 2010, 2033, 2017, 1100, 1245, 1122</p>
1028	<p>This comment supports a “Good, Better, Best” strategy in alignment with the overall mapping strategy letter submitted. The goal is to ensure optimized alignment of APAs for geographic cohesion, density improvement, and technology needs.</p> <p>We recommend splitting APA 1028 and combining portions of APAs 1160 and 1029. Suggested APA 1028A enhances density within a cohesive geographic region.</p> <p>1028 A: 1114, 2072, 1118, 2042, 1132, 1058, 2076, 1095, 2038, 1122, 2031, 1102, 2069, 1086, 1123, 1116, 1060, 1121, 1115, 1131, 1103, 2077, 1120, 2063, 2009, 2065, 2064, 2032, 1140, 2070, 1128, 2066, 2006, 2033, 1119, 1056, 1059, 2043, 1054, 2068</p>

Idaho Office of Broadband Application Project Area (APAs) Public Comments

Jess BurnsLee (cont.)

1028	<p>This comment supports a “Good, Better, Best” strategy in alignment with the overall mapping strategy letter submitted. The goal is to ensure optimized alignment of APAs for geographic cohesion, density improvement, and technology needs.</p> <p>We recommend splitting APA 1028 and combining portions of APAs 1160 and 1029.</p> <p>Suggested APA 1028_1160_1029 Combo creates a larger geography, but enhances density within a cohesive geographic region. (Blocks are organized by Tract)</p> <p>1028_1160_1029 Combo</p> <p>950300: 2009, 2210, 2209, 2008, 2003, 2001, 2007, 2002, 2005, 2006, 1039, 1034, 1040, 1045, 1020, 1003, 1013, 2018, 1014, 1050, 1019</p> <p>960100: 3152</p> <p>970100: 1207, 1248, 1274, 1250, 1201</p> <p>971500: 2031, 1168</p>
1029	<p>This comment supports a “Good, Better, Best” strategy in alignment with the overall mapping strategy letter submitted. The goal is to ensure optimized alignment of APAs for geographic cohesion, density improvement, and technology needs.</p> <p>Recommended changes lead to a smaller more manageable APA 1029 suggested here as 1029 A with BSLs that are more similar.</p> <p>1029 A: 3137, 1033, 1045, 3128, 1025, 1034, 1035, 1032, 3138, 3107</p>
1135	<p>This comment supports a “Good, Better, Best” strategy in alignment with the overall mapping strategy letter submitted. The goal is to ensure optimized alignment of APAs for geographic cohesion, density improvement, and technology needs.</p> <p>We recommend splitting 1035 into areas of density. Suggested APA 1035 A has BSL's that are geographically more distant. Creating a clear strategy. We suggest combining 1135 and 1028 to create a larger geography but with similar density.</p> <p>1135A: 2109, 2110, 2108, 2016, 2037</p>
1135	<p>Suggested APA 1035 A has BSL's that are geographically more distant. We suggest combining 1135 and 1028 to create a larger geography but with similar density.</p> <p>1135_1028 Combo</p> <p>950300: 3027, 3026, 3028, 3029, 3033, 3025, 1103, 3030, 3006, 2084, 1070, 2035, 3044, 1093, 3005, 3007, 1048, 3008, 2026, 1086, 1095, 2078, 2081, 2208, 2202, 2080, 2201, 3004, 2068, 2039, 2065, 2071, 2025, 2052, 2100, 2102, 2054, 2092, 2059, 2063, 2062, 2051, 2024, 2060, 2094, 1083, 2056, 2099, 1073, 2066, 1108, 2021, 2085, 2079, 3024, 1065, 2027, 1069, 2072, 1068, 2105, 1107, 3042, 1071, 3000, 2055, 3001, 2030, 2050, 2032, 2049, 3050, 2053, 2033, 2069, 2070, 2034, 2091, 1064, 1059, 1087, 2200, 2106, 1062, 2090, 2044, 2048, 2061, 1063, 1060, 1046, 2047, 2093, 1088, 1066, 2098, 1067, 1042, 1072, 1047</p> <p>950600: 3013, 3014, 3011, 3030, 1018</p> <p>950700: 3059, 3061, 3040, 3046, 3042, 3031, 3081, 3062, 1015, 3085, 1010, 3047, 3049, 3027, 3048, 3028, 1009, 3045, 3060, 1012, 3063, 1011, 1016, 3029, 3084, 3015"</p>
1160	<p>This comment supports a “Good, Better, Best” strategy in alignment with the overall mapping strategy letter submitted. The goal is to ensure optimized alignment of APAs for geographic cohesion, density improvement, and technology needs.</p> <p>We recommend splitting APA 1160 to better organize BSLs with varying densities, aligning the strategy for optimal connection. Groups distant BSLs.</p> <p>1160 A : 1211, 1209, 1162, 1228, 1214, 1257, 2119, 1238, 1160, 1231, 1237, 1154, 3059, 1094, 3061, 1139, 1142</p>

Idaho Office of Broadband Application Project Area (APAs) Public Comments

Jess BurnsLee (cont.)

1160	<p>This comment supports a “Good, Better, Best” strategy in alignment with the overall mapping strategy letter submitted. The goal is to ensure optimized alignment of APAs for geographic cohesion, density improvement, and technology needs.</p> <p>We recommend splitting APA 1160 to better organize BSLs with varying densities, aligning the strategy for optimal connection. Groups denser BSLs.</p> <p>1160 B : 1097, 3086, 1112, 3047, 3079, 1098, 1319, 1320, 1316, 3075, 3076, 3074, 3046, 1114, 1110, 1109, 3077, 1317, 1115, 1318, 1095, 3073, 1123, 3015, 2129, 1113, 3082, 1099, 1126, 3024, 2128, 1102, 1100, 1119, 3063, 3023, 3017, 3062, 3064, 1138, 1136, 1127, 1147</p>
1096	<p>This comment supports a “Good, Better, Best” strategy in alignment with the overall mapping strategy letter submitted. The goal is to ensure optimized alignment of APAs for geographic cohesion, density improvement, and technology needs.</p> <p>We suggest the following block grouping for APA 1096A to enhance BSL density consistency:</p> <p>1096 A: 5073, 5178, 5177, 5200, 5168, 5202, 5181, 5165, 5169, 5163, 5201, 5124, 5123, 5084, 5146, 5164, 5135, 5090, 5136, 5133, 5137, 5125, 5126, 5145, 5089, 5147, 2191, 5077, 5091, 5092, 5071, 2005, 5122, 5070, 5121, 5127, 5130, 5080, 5079, 5179, 5153, 5148, 5072, 5156, 5155, 5167, 5104, 5161, 5066</p>
1096	<p>This comment supports a “Good, Better, Best” strategy in alignment with the overall mapping strategy letter submitted. The goal is to ensure optimized alignment of APAs for geographic cohesion, density improvement, and technology needs.</p> <p>We suggest the following block grouping for APA to clean up APA islands.</p> <p>1096_1027 Combo: 1072, 1071, 5190, 1070"</p>
1096	<p>We recommend excluding block 1016 and combining it with blocks 1288 and 1031 from APA 1017 to create a smaller APA with a clear and succinct strategy.</p>
1017	<p>This comment supports a “Good, Better, Best” strategy in alignment with the overall mapping strategy letter submitted. The goal is to ensure optimized alignment of APAs for geographic cohesion, density improvement, and technology needs.</p> <p>We recommend excluding blocks 1288 and 1013 and combining them with block 1016 from APA 1096 to create a smaller APA with a clear and succinct strategy.</p>
1027	<p>This comment supports a “Good, Better, Best” strategy in alignment with the overall mapping strategy letter submitted. The goal is to ensure optimized alignment of APAs for geographic cohesion, density improvement, and technology needs.</p> <p>We suggest the following block grouping for APA 1027A to enhance BSL density consistency:</p> <p>1027A: 3001, 2026, 1023, 1038, 1019, 2025, 2012, 3000, 2017, 3002, 3004, 1034, 1009, 1026, 1008, 1014, 1003, 2010, 1010, 1106, 1004, 1001</p>
1027	<p>We suggest this APA to address and eliminate census block islands, ensuring improved geographic cohesion.</p> <p>1027 B : 1110, 1068</p>
1026	<p>submitted. The goal is to ensure optimized alignment of APAs for geographic cohesion, density improvement, and technology needs.</p> <p>Blocks 110, 1068 could be combined with blocks from 1026 to make. Amore cohesive bsl region with similar densities.</p> <p>1026_1027B Combo</p> <p>960100: 1177, 1124, 1174, 1126, 1064, 1081, 1176, 1166, 1063, 1115, 1173, 1147, 1121, 1165, 1113, 1172, 1068, 1083, 1060, 1184, 1168, 1170, 1175, 1062</p> <p>960200: 1110</p>

Idaho Office of Broadband Application Project Area (APAs) Public Comments

Jess BurnsLee (cont.)

1082	<p>This comment supports a “Good, Better, Best” strategy in alignment with the overall mapping strategy letter submitted. The goal is to ensure optimized alignment of APAs for geographic cohesion, density improvement, and technology needs.</p> <p>We recommend splitting the geography to optimize project size and ensure regularity in density, improving overall alignment and feasibility.</p> <p>Add block 1182 from APA 1026 and include the following 1082 Blocks.</p> <p>1082A: 1076, 1071, 1074, 1040, 1077, 1049, 1075, 1034, 1041</p>
1082	<p>This comment supports a “Good, Better, Best” strategy in alignment with the overall mapping strategy letter submitted. The goal is to ensure optimized alignment of APAs for geographic cohesion, density improvement, and technology needs.</p> <p>We recommend splitting the geography to balance project size and ensure consistency in density, enhancing alignment and implementation efficiency.</p> <p>1082B: 1326, 1218, 1219, 1239, 1217, 1392, 1322, 1323, 1325, 1386, 1387, 1388, 1195, 1200, 1202, 1389, 1180, 1390, 1179, 1393, 1198, 1385, 1381, 1384, 1332, 1331, 1313, 1311, 1207, 1395, 1328, 1211, 1314, 1206, 1192, 1327, 1203, 1316, 1214, 1396, 1208, 1177, 1380, 1189</p>
1022	<p>This tract is practically perfect in every way. It demonstrates strong geography and density alignment while providing clear options for competitive applications.</p>
1021	<p>While large and potentially splittable, this tract works well as it is due to the lack of density disparities and lends itself to creative alternative solutions.</p>
1025	<p>This comment supports a “Good, Better, Best” strategy in alignment with the overall mapping strategy letter submitted. The goal is to ensure optimized alignment of APAs for geographic cohesion, density improvement, and technology needs.</p> <p>We recommend splitting the geography to balance project size, ensure density consistency, and explore alternative technology possibilities for optimized implementation.</p> <p>1082_1025 Combo: 950100: 3218, 3120, 1189, 3125, 1159, 3116</p> <p>960100: 1271, 1302, 1299, 1264, 1276, 1291, 1270</p>
1025	<p>This comment supports a “Good, Better, Best” strategy in alignment with the overall mapping strategy letter submitted. The goal is to ensure optimized alignment of APAs for geographic cohesion, density improvement, and technology needs.</p> <p>We recommend splitting the geography to balance project size, ensure density consistency, and evaluate the potential for alternative technology solutions, optimizing both coverage and implementation strategies. Add block 2157 from APA 1023</p> <p>1024_1025 Combo 1: 1010, 1196, 2162, 1012, 1078, 2159, 1202, 1084, 1115, 1081, 1116, 1114, 1149, 1079, 1070, 1068, 1080, 1088, 1111, 1148, 1074, 1153, 1135, 1002, 1009, 1082, 1067, 1066, 2161, 1062, 1117, 1013, 1007, 1004, 1126, 1185, 1101, 1144, 1113, 1125, 1001, 1123, 1121, 1087, 1131, 1138, 1108, 1154, 1142, 1145, 1057</p>
1025	<p>We recommend splitting the geography to balance project size, ensure density consistency, and evaluate the potential for alternative technology solutions, optimizing both coverage and implementation strategies.</p> <p>1024_1025 Combo 2</p> <p>950100: 3051, 2088, 3056, 3152, 3174, 2143, 2120, 3108, 3099, 3146, 3196, 3195, 3199, 3055, 3193, 3194, 3167, 3102, 3063, 3166, 3197, 3148, 3023, 2136, 3078, 3169, 3085, 3005, 3185, 3071, 2100, 3188, 2135, 3201, 3109, 2133, 3003, 2147, 3077, 3178, 3081, 2119, 3182, 3074, 3062, 3160, 2145, 2112, 3064</p> <p>950600: 2156, 2220, 2221</p>

Idaho Office of Broadband Application Project Area (APAs) Public Comments

Jess BurnsLee (cont.)

1020	<p>This comment supports a “Good, Better, Best” strategy in alignment with the overall mapping strategy letter submitted. The goal is to ensure optimized alignment of APAs for geographic cohesion, density improvement, and technology needs.</p> <p>This APA is large and should be split to create more manageable geographies with similar BSL densities, ensuring better alignment with technical strategies.</p> <p>1020A: 1022, 2262, 1021, 1058, 2249, 1059, 2247, 1054, 1026, 1030, 1020, 1019, 1060, 2239, 1018, 2279, 1024, 2261, 2278, 2649, 2260, 1056, 1055, 2258, 1023, 1025, 1083, 2238, 2294, 2268, 1061, 1084, 2257, 2277, 1029</p>
1020	<p>This comment aligns with the “Good, Better, Best” strategy to optimize APA cohesion, density, and technology focus. This APA is large and should be split to create more manageable geographies with similar BSL densities, ensuring better alignment with technical strategies.</p> <p>1020B: 3059, 3050, 3062, 3052, 3058, 3051, 3060, 3070, 3063, 3100, 3068, 3026, 1012, 1013, 3071, 3048, 1031, 1014, 3067, 3069, 1057, 1027, 3008, 3106, 3042, 3043, 3049, 1019, 1055, 3038, 1124, 3057, 3099, 3122, 3053, 3045, 3001, 1056, 3092, 3019, 3046, 3065, 1039, 3044, 3011, 1006, 1023, 3064, 3090, 1022, 1011, 3010, 3047, 1121, 3037, 3109, 3088, 1005, 1046, 1057, 1010, 3091, 3115, 1015, 1038, 3118, 3079, 3096, 3113, 3112, 3095, 3114, 3103, 3097, 3021, 3107, 3086, 3110, 3084, 3119, 3089, 3085, 3111, 3104, 3093, 3094, 3117, 3013, 3102, 3020, 3101, 1058, 1018, 3108, 3066, 3105, 1122, 3007, 3054, 3022, 3081, 3098, 3016, 3036, 3024, 1005, 1003, 3017, 1123, 3023, 3005, 3087, 3019, 1054, 3075</p>
1020	<p>This APA is large and should be split to create more manageable geographies with similar BSL densities, ensuring better alignment with technical strategies.</p> <p>1020C: 1076, 1082, 1043</p>
1013	<p>This comment supports a “Good, Better, Best” strategy in alignment with the overall mapping strategy letter submitted. The goal is to ensure optimized alignment of APAs for geographic cohesion, density improvement, and technology needs.</p> <p>This approach creates BSL density consistency and sharpens the focus on technology alignment for optimal project outcomes.</p> <p>1013_1012 Combo: 1210, 1211, 1200, 1209, 1186, 1197, 1295, 1217, 1218, 1201, 1219, 1208, 1198, 1294, 1199, 1207, 1187, 1195, 1238, 1183, 1225, 1223, 1221, 1237, 1212, 1206, 1192, 1185, 1222, 1194, 1216, 1178, 1236, 1239, 1230, 1196, 1231, 1191, 1279, 1226, 1256, 1203, 1257, 1227, 1266, 1255, 1177, 1232, 1267, 1248, 1176, 1246, 1247, 1253, 1224, 1175, 1264, 1240, 1220</p>
1013	<p>We recommend splitting the large 1014 into geographically sensible chunks to align technology options with BSL density and geographic cohesion. This approach ensures a strategic balance between feasibility and technical implementation.</p> <p>1013_1014 Combo 960100: 1551, 1558, 1527 960102: 1210, 1211, 1200, 1209, 1186, 1197, 1295, 1217, 1218, 1201, 1219, 1208, 1198, 1294, 1199, 1207, 1187, 1195, 1238, 1183, 1225, 1223, 1221, 1237, 1212, 1206, 1192, 1185, 1222, 1194, 1216, 1178, 1236, 1239, 1230, 1196, 1231, 1191, 1279, 1234, 1226, 1256, 1203, 1257, 1227, 1266, 1255, 1177, 1232, 1267, 1248, 1176, 1246, 1247, 1253, 1224, 1175, 1264, 1240, 1220, 1214</p>
1014	<p>We recommend splitting the large 1014 into geographically sensible chunks to align technology options with BSL density and geographic cohesion. This approach ensures a strategic balance between feasibility and technical implementation.</p> <p>1014 N : 2046, 2047, 2079, 2092, 2077, 2043, 2081, 2068, 2063, 2093, 4002, 2089</p>

Idaho Office of Broadband Application Project Area (APAs) Public Comments

Jess BurnsLee (cont.)

1014	<p>This comment supports a “Good, Better, Best” strategy in alignment with the overall mapping strategy letter submitted. The goal is to ensure optimized alignment of APAs for geographic cohesion, density improvement, and technology needs.</p> <p>We recommend splitting the large 1014 into geographically sensible chunks to align technology options with BSL density and geographic cohesion. This approach ensures a strategic balance between feasibility and technical implementation.</p> <p>1014 S: 2152, 2134, 4253, 2150, 2133, 2130, 4251, 4208, 2108, 2159</p>
1012	<p>Block 1024 should be included in APA 1098 to address geographic alignment and ensure a cohesive structure.</p>
1012	<p>The remainder of this group is more closely aligned with both BSL density and geographic cohesion, ensuring better consistency and strategic implementation.</p>
1012	<p>This comment supports a “Good, Better, Best” strategy in alignment with the overall mapping strategy letter submitted. The goal is to ensure optimized alignment of APAs for geographic cohesion, density improvement, and technology needs.</p> <p>This approach creates density while carving out areas suited for heavy alternative solutions into another APA, ensuring strategic alignment and optimization.</p> <p>1012A: 1123, 1393, 1157, 1290, 1695, 1389, 1390, 1173, 1384, 1128, 1042, 1397, 1522, 1132, 1379, 1387, 1289, 1147, 1133, 1287, 1392, 1385, 1049, 1529, 1184, 1155, 1396, 1130, 1377, 1154, 1519, 1174, 1124, 1156, 1114, 1038, 1046, 1047, 1380, 1039, 1135, 1145, 1378, 1120, 1151, 1126</p>
1113	<p>This comment supports a “Good, Better, Best” strategy in alignment with the overall mapping strategy letter submitted. The goal is to ensure optimized alignment of APAs for geographic cohesion, density improvement, and technology needs.</p> <p>We suggest splitting this APA to focus on density and technology while managing the span of the area. This will ensure efficient implementation and strategic alignment.</p> <p>1113A: 2086, 1086, 2096, 2057, 2218, 2058, 1083, 2092, 1085</p>
1113	<p>This comment supports a “Good, Better, Best” strategy in alignment with the overall mapping strategy letter submitted. The goal is to ensure optimized alignment of APAs for geographic cohesion, density improvement, and technology needs.</p> <p>We suggest splitting this APA to focus on density and technology while managing the span of the area. This will ensure efficient implementation and strategic alignment.</p> <p>1113B: 2047, 2223, 2048, 2217, 2215, 2216, 2045, 2214, 2211, 2153, 2039, 2046, 2043, 2155, 2042, 2040, 3000, 2154, 2055, 2049, 2152, 2052, 2038</p>
1113	<p>This comment supports a “Good, Better, Best” strategy in alignment with the overall mapping strategy letter submitted. The goal is to ensure optimized alignment of APAs for geographic cohesion, density improvement, and technology needs.</p> <p>We suggest splitting this APA to focus on density and technology while managing the span of the area. This will ensure efficient implementation and strategic alignment.</p> <p>1113C: 2028, 2031, 2118, 2126, 2021, 2026</p>
1113	<p>This comment supports a “Good, Better, Best” strategy in alignment with the overall mapping strategy letter submitted. The goal is to ensure optimized alignment of APAs for geographic cohesion, density improvement, and technology needs.</p> <p>We suggest combining parts of APAs 1113 and 1122 to enhance focus on density and technology while effectively managing the span of the area. This approach will ensure efficient implementation and strategic alignment.</p> <p>1113_1122 : 1236, 1246, 2008, 1268. 1343, 1241, 2015, 2009, 2029, 1252, 1242, 2019, 1238</p>

Idaho Office of Broadband Application Project Area (APAs) Public Comments

Jess BurnsLee (cont.)

1122	<p>This comment supports a “Good, Better, Best” strategy in alignment with the overall mapping strategy letter submitted. The goal is to ensure optimized alignment of APAs for geographic cohesion, density improvement, and technology needs.</p> <p>We suggest splitting APA 1122 to better manage the area and density, as it is currently overly large. This will ensure improved efficiency and strategic alignment.</p> <p>1122A: 1206, 1221, 1207, 1208, 1217, 1205, 1218, 1204, 1219, 1260, 1256, 1250, 1228, 1209</p>
1122	<p>This comment supports a “Good, Better, Best” strategy in alignment with the overall mapping strategy letter submitted. The goal is to ensure optimized alignment of APAs for geographic cohesion, density improvement, and technology needs. We suggest splitting APA 1122 to better manage the area and density, as it is currently overly large. This will ensure improved efficiency and strategic alignment.</p> <p>1122B: 1347, 1340, 1339, 1302, 1298, 1299, 1300, 1303</p>
1122	<p>This comment supports a “Good, Better, Best” strategy in alignment with the overall mapping strategy letter submitted. The goal is to ensure optimized alignment of APAs for geographic cohesion, density improvement, and technology needs. We suggest splitting APA 1122 to better manage the area and density, as it is currently overly large. This will ensure improved efficiency and strategic alignment.</p> <p>1122C: 2178, 3020, 4071, 4045, 3003, 2200, 3025, 3039, 2203, 4050, 4070, 4052, 3030, 4049, 4094, 2188, 4081, 2177, 4078, 4046, 3141, 4051, 4047, 2189, 2176, 4041, 3031, 3010, 4026, 3065, 4033, 3107, 4044, 3015, 2166, 2164, 2190, 3001</p>
1017	<p>We recommend excluding blocks 1288 and 1013 and combining them with block 1016 from APA 1096 to create a smaller APA with a clear and succinct strategy.</p>
1017	<p>This comment supports a “Good, Better, Best” strategy in alignment with the overall mapping strategy letter submitted. The goal is to ensure optimized alignment of APAs for geographic cohesion, density improvement, and technology needs.</p> <p>We suggest splitting this APA to focus on density and technology while managing the span of the area for better efficiency and strategic alignment.</p> <p>1017A: 1034, 3063, 1137, 3067, 1032, 3069, 3009, 3064, 1021, 3010, 3011, 3065, 1009, 1005, 1117, 3074, 1074, 1019, 1016, 1046, 1010, 1000, 3000</p>
1017	<p>We suggest splitting this APA to focus on density and technology while managing the span of the area for better efficiency and strategic alignment.</p> <p>1017B: 1059, 1089, 1067, 1014, 1088, 1065, 1090, 1104, 1078, 2077, 1042, 1080, 1061, 1055, 1060, 1040, 1013, 1015, 1102, 1066, 1043, 1070, 1011, 1053, 1069, 1084, 1099, 1086, 1057</p>
1018	<p>We suggest splitting this APA to focus on density and technology while managing the span of the area for better efficiency and strategic alignment.</p> <p>1018A: 3005, 1052, 3027, 1036, 3000</p>
1018	<p>We suggest splitting this APA to focus on density and technology while managing the span of the area for better efficiency and strategic alignment.</p> <p>1018B: 2005, 3017, 2013, 2004, 2014, 2010, 2008, 2026, 2008, 2014, 3031, 2020, 1005, 1136, 3019, 3013, 1092,</p>
1161	<p>This comment supports a “Good, Better, Best” strategy in alignment with the overall mapping strategy letter submitted. The goal is to ensure optimized alignment of APAs for geographic cohesion, density improvement, and technology needs.</p> <p>We suggest splitting this APA to focus on density and technology while managing the span of the area for better efficiency and strategic alignment.</p> <p>1161A: 2089, 2088, 2004, 2003, 2017, 2087, 2065, 2094, 2082, 2025, 2079, 2107, 2068, 2039, 2062, 2066, 2084, 2005, 2072, 2048, 2074, 2018, 2016, 2000, 1099, 1036, 1035, 1039, 2073, 2042, 2054, 1031</p>

Idaho Office of Broadband Application Project Area (APAs) Public Comments

Jess BurnsLee (cont.)

1161	<p>This comment supports a “Good, Better, Best” strategy in alignment with the overall mapping strategy letter submitted. The goal is to ensure optimized alignment of APAs for geographic cohesion, density improvement, and technology needs.</p> <p>We suggest splitting and combining portions of APAs 1161, 1018, and 1134 to enhance focus on density and technology while managing the span of the area. This approach ensures improved efficiency and strategic alignment.</p> <p>1161_1018_1134 Combo: 1024, 2015, 2017, 1012, 2007, 1027, 1017, 1013, 2024, 1030, 1028, 1011, 2026, 2012, 1034, 1008, 2005, 2037, 2028, 2004, 2047, 2027, 2023, 1061, 1022, 1060, 1010, 2006, 2019, 1023, 3050, 3002, 2005, 2020, 2021, 2010, 1056, 1033, 2002, 1089, 1020, 2007, 2034, 1067, 1019, 2018, 2033, 2025, 2036, 1015, 2029, 1018, 2044, 1097, 2032, 1026, 3031, 1007, 2000, 1021, 2006, 2016, 1000, 1009</p>
1134	<p>This comment supports a “Good, Better, Best” strategy in alignment with the overall mapping strategy letter submitted. The goal is to ensure optimized alignment of APAs for geographic cohesion, density improvement, and technology needs.</p> <p>We suggest splitting this APA to focus on density and technology while managing the span of the area for better efficiency and strategic alignment.</p> <p>1134A: 1104, 1110, 1099</p>
1015	<p>This comment supports a “Good, Better, Best” strategy in alignment with the overall mapping strategy letter submitted. The goal is to ensure optimized alignment of APAs for geographic cohesion, density improvement, and technology needs.</p> <p>This APA needs to be split up as it covers a span and density that muddles strategic focus. Dividing it will ensure clearer alignment with density and technology strategies.</p> <p>1015A: 4159, 4210, 1022, 4189, 1004, 1009, 1008, 1003, 1017, 1026, 1002, 1001, 4158, 1005, 1036, 4155, 4173</p>
1015	<p>This APA needs to be split up as it covers a span and density that muddles strategic focus. Dividing it will ensure clearer alignment with density and technology strategies.</p> <p>1015B: 1159, 1100, 1158, 1148, 3040, 1099, 4034, 1097, 3035, 1162, 3039, 4037, 1147, 3041, 1124, 1095</p>
1015	<p>This APA needs to be split up as it covers a span and density that muddles strategic focus. Dividing it will ensure clearer alignment with density and technology strategies.</p> <p>1015C: 3086, 1187, 1475, 4038, 1592, 3045, 1589, 1576, 4904, 3064, 1593, 3077, 4897, 4077, 1144, 3046, 1595, 1146, 3049, 1591, 1110, 1121, 3092, 1166, 1574, 1610, 3067, 4039, 3044, 3051, 1606, 1114, 3054, 1163, 3065, 4075, 3060, 3058, 1588, 1168, 1501, 4076, 4058, 3053, 3043, 1594, 4078, 4027, 4029, 1145, 4037, 1123, 4042, 1458, 3031, 4048, 3050, 3082, 4056, 1613, 1186, 4062</p>
1015	<p>This approach aligns geography and tidies the suggested APAs while maintaining consistent BSL density for improved strategic coherence.</p> <p>1015_1009 Combo: 1184, 1183, 4124, 1185, 1214, 1173, 1170, 4110, 1070, 4049, 1062, 4118, 1161</p>
1009	<p>This comment supports a “Good, Better, Best” strategy in alignment with the overall mapping strategy letter submitted. The goal is to ensure optimized alignment of APAs for geographic cohesion, density improvement, and technology needs.</p> <p>Splitting APA 1009 helps manage geography and BSL density effectively, eliminating distracting blocks that do not align.</p> <p>1009 A: 3001, 1018, 1020, 1021, 1022, 1023, 1033, 2012, 1009, 3000, 3014, 1011, 2013, 1008, 1019, 3000, 1016, 3009, 1038</p>
1009	<p>Splitting APA 1009 helps manage geography and BSL density effectively, eliminating distracting blocks that do not align.</p> <p>1010 B: 2000, 1009, 2003, 2001, 1028, 1001, 2030, 2002, 2009, 2000, 2004, 4000, 2002, 4002, 2003, 2013</p>

Idaho Office of Broadband Application Project Area (APAs) Public Comments

Jess BurnsLee (cont.)

1009	<p>Splitting APA 1009 helps manage geography and BSL density effectively, eliminating distracting blocks that do not align.</p> <p>1011 C: 4004, 2005, 4006, 4002, 2001, 2000, 2010, 4003, 2016, 3001, 4039, 1002, 1005, 3014, 1000, 2006, 4027, 2003, 2011, 2019, 2010, 2001, 3013, 1000, 1020, 2004, 2020, 2004, 2001, 1004, 3000, 4028, 2008, 2002, 1001, 2000, 2012, 4025, 3003, 1001, 3001, 4013, 3011, 3000</p>
1011	<p>This comment supports a “Good, Better, Best” strategy in alignment with the overall mapping strategy letter submitted. The goal is to ensure optimized alignment of APAs for geographic cohesion, density improvement, and technology need</p> <p>Splitting APA 1011 and grouping it with other orphaned blocks from APAs 1099 and/or 1089 creates groups with similar BSL densities while effectively managing geography.</p> <p>1011_1009: 1143, 1168, 1145, 1142, 1167, 1217, 1144, 1086, 1211, 1067, 1069, 1114, 1212, 1079, 1004, 1118, 4149, 1058, 1068, 1064, 4113, 1003, 1093, 1100, 1002, 1204, 1066, 1076, 1071, 1085, 1218, 1096, 4147, 1075, 1065, 1056, 1089, 1098, 1094, 1084, 1088, 1074, 4148, 1005, 4130, 1137, 4135, 1216, 1214, 1078, 1210, 1161</p>
1011	<p>Splitting APA 1011 and grouping it with other orphaned blocks from APAs 1099 and/or 1089 creates groups with similar BSL densities while effectively managing geography.</p> <p>1011_1009_1089: 3027, 3039, 1043, 1129, 1117, 4009, 4006, 4083, 4008, 1044, 1127, 1050, 1049, 4003, 1130, 3035, 1051, 1015, 1045, 1060, 1054, 3026, 4005, 1059, 1102, 1240, 1241, 1027, 1058, 1038, 1040, 1236, 1001, 1218, 1018, 1046</p>
1089	<p>This comment supports a “Good, Better, Best” strategy in alignment with the overall mapping strategy letter submitted. The goal is to ensure optimized alignment of APAs for geographic cohesion, density improvement, and technology needs. This APA should be split to focus on density and technology while effectively managing the span of the area, ensuring strategic alignment and efficiency.</p> <p>1089 A: 1239, 1073, 1243, 1245, 1244, 1242, 1236, 1070, 1071</p>
1089	<p>This APA should be split to focus on density and technology while effectively managing the span of the area, ensuring strategic alignment and efficiency.</p> <p>1090 B: 1155, 1097, 1093, 1090, 1111, 1086, 1110, 1145, 1102, 1194, 1107, 1100, 1098, 1112, 1195, 1108, 1088, 1146, 1084, 1181, 1663, 1193, 1113, 1184, 1191, 1089, 1186, 1136, 1669, 1106, 1163, 1664, 1177, 1175, 1153, 1109, 1187, 1142, 1137, 1676, 1196, 1134, 1161, 1216, 1178, 1164, 1189, 1083, 1152</p>
1089	<p>This APA should be split to focus on density and technology while effectively managing the span of the area, ensuring strategic alignment and efficiency.</p> <p>1091C: 1251, 1033, 1209, 1308, 1230, 1305, 1293, 1660, 1229, 1273, 1034, 1231, 1233, 1303, 1280, 1304, 1272, 1208, 1278, 1204</p>
1155	<p>These Blocks create odd technology issues. They could be their own isolates or could be incorporated into strategic application for alternative technology.</p> <p>1155_1156: 2007, 2010, 1003, 1104</p>
1016	<p>Could be split, but has a strategic density due to fiber locations and roadways.</p>
1162	<p>This comment supports a “Good, Better, Best” strategy in alignment with the overall mapping strategy letter submitted. The goal is to ensure optimized alignment of APAs for geographic cohesion, density improvement, and technology needs.</p> <p>This APA should be split to focus on density and technology while effectively managing the span of the area, ensuring strategic alignment and efficiency.</p> <p>1162A: 4097, 1322, 1645, 2016, 1286, 2031, 2002, 2040, 1329, 2005, 1310, 1288, 1300, 2013, 4094, 1345, 2017, 1207, 1338, 1318, 1298, 2020, 1311, 1190, 1294, 4000, 1647, 1317, 4071, 1292, 1330, 1309, 1297, 1285</p>

Idaho Office of Broadband Application Project Area (APAs) Public Comments

Jess BurnsLee (cont.)

1162	<p>This APA gathers orphaned blocks while maintaining alignment with density and geographic management.</p> <p>1162_1015: 2192, 2123, 2152, 2179, 2125, 2178, 2204, 2132, 2113, 2112, 2111, 2190, 2147, 2171, 2159, 2183, 2184, 2175, 2149, 2137, 2167, 2173, 2138, 2162, 2089, 2136, 2189, 2174, 2170, 2140, 2141, 2165, 2126, 2191, 2166, 2150, 2182, 2164, 2188, 2169, 2156, 2135, 2177, 2187, 2133, 2176, 2105, 2145, 2186, 2153, 2128, 2172, 2161, 2127, 2163, 2185, 2160, 2124, 2139, 2116, 2091, 2154, 2151, 2144, 2120, 2117, 2085, 2082, 2079, 2143, 2084, 2083, 2119, 2129, 2081, 2168, 2142, 2180, 1364, 2202, 2246, 2130, 2203, 2118, 2201, 2090, 2075, 1370, 2114, 2199, 2074, 2209, 2131, 1423, 2155, 2220, 1655, 2115, 2221, 2121, 2244, 2222, 2080, 2122, 2200, 2108, 1427, 2245, 2223, 1369, 2197, 1449, 2243, 2109, 2235, 2218, 2106, 1444, 2247, 2036, 2234, 2214, 1447, 2181, 1426, 2071, 1424, 2104, 2072, 2157, 1438, 2226, 2054, 2148, 2099, 1434, 2236, 2241, 1487, 2097, 2194, 2219, 1425, 2069, 2158, 2198, 1643, 2044, 2092, 2231, 1437, 2073, 2146, 1410, 2047, 2065, 2193, 2107, 1459, 2238, 2055, 1472, 2225, 2233, 1415, 2088, 2237, 2078, 2224, 2227, 2103, 2195, 4034, 4032, 1448, 1416, 3090, 1436, 4040, 1454, 1441, 1470, 1368, 2215, 1479, 1406, 4024, 2098, 1471, 2217, 1466, 2035, 1463, 2050, 4046, 3072, 1462, 1508, 4031, 2021, 1362, 1453, 4033, 2068, 3069, 1440, 2019, 2213, 1446, 1432, 2101, 2207, 1418, 2022, 2102, 1483, 2041, 1457, 4030, 1476, 1408, 2208, 4907, 1455, 1358, 2205, 1414, 1465, 1363, 4021, 2024, 3070, 1352, 2228, 1435, 1458, 1488, 1477, 1480, 4018</p>
1162	<p>The end Blocks on 1162, 1190,1207, 4000, 1317, 1318</p> <p>1162 Fiber Huts</p> <p>1162, 1190,1207, 4000, 1317, 1318</p>
1131	<p>This comment supports a “Good, Better, Best” strategy in alignment with the overall mapping strategy letter submitted. The goal is to ensure optimized alignment of APAs for geographic cohesion, density improvement, and technology needs.</p> <p>This APA should be split to focus on density and technology while effectively managing the span of the area, ensuring strategic alignment and efficiency.</p> <p>1131A: 2110, 2115, 4277, 4279, 2133, 2120, 4266, 2114, 2026, 2106</p>
1131	<p>This comment supports a “Good, Better, Best” strategy in alignment with the overall mapping strategy letter submitted. The goal is to ensure optimized alignment of APAs for geographic cohesion, density improvement, and technology needs.</p> <p>This APA should be split to focus on density and technology while effectively managing the span of the area, ensuring strategic alignment and efficiency.</p> <p>1131B: 2012, 2010, 2009, 2015, 2057, 2074, 2011, 2014, 2035, 2056, 2072, 2016, 2008, 3000</p>
1131	<p>This APA should be split to focus on density and technology while effectively managing the span of the area, ensuring strategic alignment and efficiency.</p> <p>1131C: 2049, 2047, 2045, 2091, 2092, 2090, 2097, 2042, 2081, 2082, 2063, 2065, 2080, 2066, 2064, 2093, 2087, 2029, 2041, 2043, 2060, 2088, 3080, 2040, 2062, 2067, 2032, 3081, 2070, 2132, 2075, 2076, 3040, 2023, 2103, 3036, 2039, 2007, 2038, 3034, 2024, 2084, 2059, 2044, 2095, 2079, 2022, 2021, 3042, 2033, 2037, 3004, 2025, 2096, 3033, 2053, 2054, 2055, 3030, 3035, 2018, 2069, 2101, 2006, 2098</p>
1146	<p>These blocks create unique technology challenges. They could either be treated as isolated units or incorporated into strategic applications for alternative technology solutions.</p> <p>1146 Isolates</p> <p>1009, 1040, 1039, 1001, 3024, 2002, 1006, 3011, 2038, 2004, 3028, 2008, 2006, 3021, 2007, 3025, 2048, 2010, 1017, 1003, 3029, 2013, 2047, 1003, 1104</p>



*Nez Perce Tribe
Department of Technology Services
Info Systems Telecom
Nez Perce Network Systems
KTVE 88.7 & 105.5*

January 8, 2025

Ramón S. Hobdey-Sánchez, J.D.
Director, Idaho Office of Broadband
Idaho Department of Commerce
700 W. State St.
Boise, Idaho 83720-0093

Re: BEAD APA's

Dear Mr. Hobdey-Sanchez:

I am writing this letter on behalf of the Nez Perce Tribe (NPT) Department of Technology Services (DTS) regarding the Idaho State BEAD application project areas. The Nez Perce Tribe has worked directly with the Idaho Office of Broadband to determine and establish the BEAD Application Project Areas within the reservation boundaries. Noting, that although the original agreement, plan and strategy was to have the tribal boundaries serve as a single APA, it was recognized that there would be benefits to the Tribe, State and BEAD applicants to have more manageable APAs to bid on during the Funding Application Phase of the Program and therefore, divide the Nez Perce Tribe's reservation into multiple BEAD APAs.

The Nez Perce Tribes offers full and strong support to the work that the Idaho Office of Broadband has completed. Please do not hesitate to get in touch with me if you need additional information or clarification. We look forward to working with the State.

Sincerely,


Melissa King
NPT DTS Manager



Jess BurnsLee | Head of People and Great Work
932 E 00 S, Bldg. B, Declo, ID 83323

RE: Optimizing Idaho's Broadband Mapping Strategy with a Good, Better, Best Approach

I am writing to address a critical aspect of Idaho's broadband project mapping strategy. As the state works toward achieving its broadband expansion goals, it is essential to align the mapping methodology with the desired outcomes to ensure **clarity, competitiveness, and efficient resource allocation**.

The **Broadband Equity, Access, and Deployment (BEAD) Program** currently emphasizes delivering fiber connectivity to as many households as **economically feasible**. To support this federal directive, Idaho's mapping strategy must reflect priorities and methodologies that address the unique geographic and economic challenges of the state while using the **right tools for the right job**.

Currently, the project area maps dilute the focus by blending areas with significant disparities in **density and distance**. This **one-size-fits-all approach** makes it challenging to develop **competitive applications** for either fiber or alternative technologies. By designing project areas that align with **geographic realities** and account for eligible broadband service locations (BSLs), Idaho can adopt a **good, better, best strategy** to enable more effective and competitive applications.

- **Good:** For areas where deploying fiber is impractical or cost-prohibitive, project areas should be defined to encourage competitive applications using **alternative technologies** such as fixed wireless or satellite. This approach ensures **connectivity for the most challenging locations**.
- **Better:** In areas where a **combination of technologies** is necessary, project areas should be grouped by **geographic region and density** to allow providers to leverage **economies of scale**. Mixed-technology solutions can optimize investments, integrating fiber where feasible and alternative technologies where necessary.
- **Best:** For areas where **fiber deployment** is geographically and economically practical, project areas should focus exclusively on fostering **competitive fiber-only applications**. This approach enables **high-quality, future-proof solutions** while avoiding artificially inflated or deflated costs due to variations in BSL density.

The **good, better, best approach** ensures that the **right tools** are used for the **right jobs**, allowing Idaho to maximize the impact of its broadband investments.

The **BEAD Program's current focus on fiber connectivity** further underscores the need for Idaho to clearly define its **mapping goals and strategies**. The current project area maps attempt to balance multiple approaches, creating a lack of **strategic clarity**. This ambiguity risks **diluting application quality**, diminishing competitiveness, and creating opportunities for **misleading applications from bad actors**.

By adopting a **clear, consistent, and tailored mapping strategy**, Idaho can achieve its broadband expansion goals, ensuring access for **unserved and underserved areas** while adhering to federal program objectives.

I would be happy to provide additional insights or collaborate further to refine these strategies. Please feel free to reach out at your convenience to discuss this further.

Thank you for your attention to this important initiative. I look forward to supporting the state's efforts to **enhance connectivity for all its residents**.

Sincerely,

Jess BurnsLee



Jess BurnsLee, PhD
Head of People and Great Work

Office 801 784 5686
jess.burnslee@etscorp.com

1103 N 1600 W Layton, UT 84041
www.ETSCorp.com



Idaho Office of Broadband
700 W. State St.
Boise, Idaho 83702

RE: Idaho's Broadband Mapping Strategy

Dear Mr. Hobdey-Sánchez and Idaho Broadband Advisory Board,

On behalf of Imagine Idaho, we are writing to formally comment on Idaho's Broadband Mapping Strategy. We wish to convey thanks at the outset for the prudent, fiscally responsible and quality process that has taken place thus far. We also recognize the state has taken extra steps to allow feedback and training to become the norm. Again, thank you. As a longtime partner and advocate for best use of funds, especially for rural Idaho's under and unserved areas, Imagine Idaho offers the following comments:

Prioritize focus on the state's goal of open access and economic feasibility to best achieve outcomes. This can be accomplished by an emphasis on end user affordability, incentivizing competition, seeking cooperation and buy in from state, local and private partners. There should also be an awareness of the need to incentivize competition, prevent bad actors, promote the ability to account for maximizing use of funds, and avoiding generic or overarching applications that would presume to achieve full connectivity without respect to cost and end user affordability.

The states project areas, as currently mapped, create a balanced approach from multiple perspectives. However, following a robust and expedient challenge process, we believe the areas deserve further refinement and considerations. Seeking the best possible outcomes from applicants (providers) also means some of the hardest to reach areas may need to be modified into other areas or scoped into their own areas. This should be carefully considered on a case-by-case basis using the best efforts of staff to ensure affordable, reliable, future proof connectivity as the ultimate end result.

Priority order should follow the use of fiber first where practicable, then fixed wireless or similar, then low orbit satellite with an emphasis on the furthest and hardest to reach BSL's. By using a multi-tiered approach to achieve best use of funds and maximize connectivity in the hardest to reach areas. This also ensures the state prioritizes fiber connectivity to as many households as possible, within reason, while managing cost in project areas. This would prevent the hardest and most expensive to reach locations from being served last and at the greatest expense. Further, it would incentivize providers to work to achieve connectivity for more locations at a lower cost using multiple technology options.

The BEAD Program allows for a mix of middle and last mile fiber to be deployed by providers. This method can achieve more connectivity and meet federal directives by bolstering Idaho's mapping strategy with economic and geological information. Considerations of concentration of BSLs as well as the lack thereof that create large gaps and subsequently higher cost between locations will need to be carefully reviewed. Understanding these unique outliers and their topography will further enable better applications and create more competition and partnerships. While this may create variance in the use of technologies, it will better meet the needs of the hardest to reach BSLs.



While there are many considerations and stakeholders with varying viewpoints, we reaffirm our commitment to this effort and our gratitude for the Idaho office of Broadband, and the IBAB in working to achieve connectivity for all Idahoans using once in a lifetime funding. We remain encouraged by the process and evolution of this mapping effort and thank you for your consideration of these comments.

Thank you,

A handwritten signature in blue ink, appearing to read "Christina Culver", is displayed on a light blue rectangular background.

Christina Culver
Imagine Idaho



Subject: Optimizing Idaho's Broadband Mapping Strategy with a Good, Better, Best Approach

I am writing to address a critical aspect of Idaho's broadband project mapping strategy. As the state works toward achieving its broadband expansion goals, it is essential to align the mapping methodology with the desired outcomes to ensure **clarity, competitiveness, and efficient resource allocation**.

The **Broadband Equity, Access, and Deployment (BEAD) Program** emphasizes delivering fiber connectivity to as many households as **economically feasible**. To support this federal directive, Idaho's mapping strategy must reflect priorities and methodologies that address the unique geographic and economic challenges of the state while using the **right tools for the right job**.

Currently, the project area maps dilute the focus by blending areas with significant disparities in **density and distance**. This **one-size-fits-all approach** makes it challenging to develop **competitive applications** for either fiber or alternative technologies. By designing project areas that align with **geographic realities** and account for eligible broadband service locations (BSLs), Idaho can adopt a **good, better, best strategy** to enable more effective and competitive applications.

- **Good:** For areas where deploying fiber is impractical or cost-prohibitive, project areas should be defined to encourage competitive applications using **alternative technologies** such as fixed wireless or satellite. This approach ensures **connectivity for the most challenging locations**.
- **Better:** In areas where a **combination of technologies** is necessary, project areas should be grouped by **geographic region and density** to allow providers to leverage **economies of scale**. Mixed-technology solutions can optimize investments, integrating fiber where feasible and alternative technologies where necessary.
- **Best:** For areas where **fiber deployment** is geographically and economically practical, project areas should focus exclusively on fostering **competitive fiber-only applications**. This approach enables **high-quality, future-proof solutions** while avoiding artificially inflated or deflated costs due to variations in BSL density.

The **good, better, best approach** ensures that the **right tools** are used for the **right jobs**, allowing Idaho to maximize the impact of its broadband investments.



The **BEAD Program's focus on fiber connectivity** further underscores the need for Idaho to clearly define its **mapping goals and strategies**. The current project area maps attempt to balance multiple approaches, creating a lack of **strategic clarity**. This ambiguity risks **diluting application quality**, diminishing competitiveness, and creating opportunities for **misleading applications from bad actors**.

By adopting a **clear, consistent, and tailored mapping strategy**, Idaho can achieve its broadband expansion goals, ensuring access for **unserved and underserved areas** while adhering to federal program objectives.