

South Carolina 2022 ARPA 1.0 Priority Area SLFRF Comment Form

ORS is NOT accepting any revisions to Grant Applications. If you have your own Grant Application(s) to notify ORS of any scriv

1. Commenter's Name

2. Commenter's Email

3. Commenter's Phone

4. Applicant Parent Organization Name

5. Applicant Legal Entity Name

6. Application Project Number

7. Application Project Name

REQUIRED

8. Is this a comment for a revision of your own ARPA 1.0 Grant Application (Yes/No)

9. Do you have documentation and/or evidence to submit to the SC Broadband Office which supports your position?

10. Application Comments



ARPA 1.0 Comment Form
ONE form per project

**ons during the Comment Period. However, all ISPs are welcomed to comment on their
rener's error(s) that may exist. All comments will be published on the ORS website.**

Von Todd (HTC)

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Frontier Communications Parent, Inc.

Frontier Communications of the Carolinas LLC

FTR-02

Florence-Williamsburg Counties

No

Yes

We have a number of concerns about Frontier's application.

It overbuilds our existing network that is serving members today, and it overlaps with funded and under construction grant projects, specifically our USDA ReConnect project. We ask that ORS refer to our funded project registry and our September 30th data submission for evidence of this. We have also enclosed supporting evidence that indicates which census block falls under which category, as well as an estimated completion date for each. The areas marked Active are completed areas that are serving customers today, and the areas marked 'Future' are our secured funding areas that will be complete by the end of Q1 2023, with many homes coming online as early as October of 2022. HTC crews have been on time or ahead of schedule in all of our projects to date, and expect this case will be no different. We have also enclosed construction photos and speed tests as supporting evidence.

ARPA program rules require a provider to commit to serving all homes within a project service area that are eligible for service. However, Frontier's comment at the bottom of page 3 indicates they may not be willing to commit to doing so.

Finally, in 2019, Frontier's copper network failed the residents of the St. Luke community in rural Georgetown County, SC. The provider's inability to restore a critical service to the residents of the community for 24 days reflected a neglected, outdated network. If Frontier doesn't have the resources to maintain an outdated copper network in this area, will they be able to reliably provide a fiber network to the wider community?

We have uploaded multiple GIS files, photos, existing customer data, service requests, along with a data dictionary, to support our comments. The service requests represents individual services that have been requested and HTC is committed to serving in either active, future, or applied for project areas.

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