

**South Carolina 2022 ARPA Grant  
Program  
Application SFRF 1.0**



**Section 1.1 - Applicant Information**

Legal Entity/Organization Name	Comcast Cable Communications, LLC ("Comcast")
Parent Organization	Comcast Cable Communications, LLC ("Comcast")
Entity Type (e.g. Corporation, non-profit, cooperative, governmental entity)	Corporation
Primary Contact Name	James A. Macke
Title	Vice President, External Affairs
Mailing Address City, State, Zip	6200 The Corners Parkway, Suite 200, Peachtree Corners, GA 30092
Phone Number	(678) 618-8084
Email	<a href="mailto:andy_macke@comcast.com">andy_macke@comcast.com</a>
FCC Registration Number (FRN):	11612017
Data Universal Numbering System (DUNS) Number	80474155
Registered in the System for Award Management (SAM)	Yes
SAM Number	PLBLL65U99M1
SC State Vendor Number	7000304569

**Section 1.2 - Project Name/Number**

Project Number (Format XXX-XX)	EDG-01
Project Name	ARPA-2022-BSO-RBB-Edgefield

### **Section 1.3 - Broadband Service Provider Context**

Date of Applicant’s Initial FCC Form 477 Submission	Same as previously provided
Date of Applicant’s Most Recent FCC Form 477 Submission	Same as previously provided
Applicant has experience delivering broadband service via fiber and/or hybrid fiber-coax infrastructure (YES/NO)	Yes

### **Section 1.4 - Broadband Infrastructure Information**

<p>Indicate the type(s) of broadband infrastructure technology to be deployed in the project service area.          Projects must provide a minimum of 100/20 Mbps scalable to 100/100 Mbps. Applicant must explain in detail why the proposed project cannot provide 100/100 Mbps.</p>	<p>Comcast proposes to construct fiber to the premises to the overwhelming majority of the addresses included in the proposed project area. This plant will be capable of gigabit symmetrical service upon completion of construction. Specific product offerings will be based on then-current consumer demand and market conditions. Technology decisions are driven by a number of variables including type and proximity of existing plant and characteristics of the proposed area. Based upon preliminary design work, Comcast estimates that a small percentage of the locations would be best served by hybrid fiber coaxial (“HFC”), taking into account both efficiency and speed of deployment. This plant will be capable of providing 1 Gbps/100 Mbps speeds, in excess of the federal broadband definition. This HFC plant is eligible for next generation DOCSIS upgrades.</p>
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### **Section 1.5 - Proposed Broadband Pricing Tiers**

Rates less than \$10/month (YES/NO)	Yes
If yes to \$10 month plan what are the upload/download speeds	YES, for Internet Essentials qualifying customers (50/10 Mbps).
Rates between \$10 - \$14.99 (YES/NO)	No
If yes to \$10-\$14.99 month plan what are the upload/download speeds	
Rates between \$15 - \$19.99 (YES/NO)	No
If yes to \$15-\$19.99 month plan what are the upload/download speeds	
Rates between \$20 - \$24.99 (YES/NO)	No
If yes to \$20-\$24.99 month plan what are the upload/download speeds	
Rates between \$25 - \$34.99 (YES/NO)	Yes
If yes to \$25-\$34.99 month plan what are the upload/download speeds	F
Do the above speed tiers include unlimited data? (YES/NO)	Yes
Is a Consumer-based Contract Required? (YES/NO)	No
Is the pricing fixed? (YES/NO)	No
What’s the duration of the pricing? (In Months)	Yes

**Section 1.6 - Project Timeline**  
**(Maximum Timeline Allotted is 24 months)**

Project Start Date	December 31, 2022
Project Construction Activity Begins	September 15, 2023
Project Construction Activity Complete	December 24, 2024
Customer Premises	3066
<i>Installations Begin</i>	December 1, 2023
<i>Installations End</i>	December 31, 2024
Overall Project Completion Date	December 31, 2024
Will the project be completed within 24 months of official Notice to Proceed (NTP)?	Yes

**Section 1.7 - Project Service Area Information**

Estimated Miles of Fiber to be Installed	477.56
Estimated Percentage Underground	167.146
Estimated Percentage Aerial	310.414
Number of Counties to be Impacted	1
County Names	Edgefield County
Total Number of Census Blocks with Concentrations of K-12	200
Total number of Census Blocks in DDA's	0
Total number of Census Blocks NOT in DDA or K-12 Concentration	159
Total Number of unserved 2020 Census Blocks part of Proposed Project	365
Total number of housing units served	2973
Total number of businesses served	91
Total number of other Public Facilities e.g. community centers, fire stations served	2
Total Structures Served	3066
Average Cost Per Structure Served	\$ 8,595.00
Does the applicant plan to serve every structure in the proposed project service area?	Yes

If no, provide an explanation for why the Project will not Pass all Homes in the proposed project service area

# South Carolina 2022 ARPA Grant Program

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### Section 2.2 - Funding Details

Description	Comment	Amount
South Carolina ARPA Broadband Grant Program Funds requested		\$ 5,240,562.81
Applicant-Provided Funding		\$ 21,111,694.00
Third-Party Funding Source (if applicable)		\$ -
Total Project Cost		\$ 26,352,256.81
Percentage Funds Requested from SC Broadband Office		20%
Percentage Funds from Applicant Match		80%
Percentage Funds from Third Party Funding Source		0%

# South Carolina 2022 ARPA Grant Program

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### Section 3.1 Confirmations

Applicant participates in the Affordable Connective Program (ACP) and will participate in the ACP for the life of ACP for the Project Service Area.

Agree

Applicant will provide at least one low-cost option without data usage caps and at speeds sufficient for households with multiple users.

Agree

The Project will comply with the requirements set forth in ARPA, South Carolina Act No. \_\_\_\_ of 2022, and other federal, state, and local laws, including environmental and permitting laws and regulations.

Agree

The Applicant will not use ARPA funds to procure or obtain certain telecom and video surveillance services or equipment as outlined in 2 CFR 200.216 and 2 CFR 200.471.

Agree

Applicant will not use ARPA funds to modernize cybersecurity for existing and new broadband networks.

Agree

Applicant will not procure telecommunications equipment or services from China.

Agree

The Project includes pre-project development uses or costs

Disagree

If Yes to above, the pre-development uses or costs will be (1) tied to an eligible broadband project or reasonably expected to lead to such a project; and (2) obligated within the period between March 3, 2021, and December 31, 2024 and expended to cover such obligations by December 31, 2026.

Select one

Applicant will require its employees, contractors, and subcontractors to comply with the applicable requirements in the South Carolina Underground Facility Damage Prevention Act pursuant to Title 58, Chapter 36 of the South Carolina Code of Laws, as amended.

Agree

Applicant affirms that it will consult with the SC Department of Transportation, electric utilities as well as local water sewer utilities as to any possible efficiencies that can be achieved with a “dig once” approach.

Agree

# South Carolina 2022 ARPA Grant Program Application SFRF 1.0



## 4.1 - Additional Information

(max 2000 character limit per item)

Provide a Summary Narrative that describes your project

Comcast Cable Communications, LLC (along with its affiliates and subsidiaries, hereafter “Comcast”), has provided high-speed communication services across South Carolina for over a decade, and we are pleased to submit this application for our Edgefield County Broadband Project (the “Project”) in response to South Carolina’s 2022 Coronavirus State Fiscal Recovery Fund Grant Program. This Project will ensure high-speed broadband is available to as many residents and businesses in unserved and underserved areas of Edgefield County (the “County”) as possible. Our Project proposes to deploy EPON as described above to 3,066 currently unserved homes and businesses across the County—according to the South Carolina Broadband Office 3/2022 Eligibility Map. Upon completion, Comcast will be able to provide broadband speeds of at least up to 1 Gbps/1 Gbps across the Project Service Area and the new fiber plant will be capable of multi-gigabit symmetrical services. The Project Service Area contains [1. 365 unserved census blocks with no Internet Service Provider (“ISP) currently serving any form of internet, and 2. 200 high-priority K-12 student census blocks]. Further, the Project will serve 100% of the housing units in priority census block(s) and 80% of the housing units in unserved census block(s) in the application upon completion. The total cost of this Project is estimated to be \$26,352,257 with an average Cost Per Structure of \$8,595. In support of this Project, Comcast will wholly invest \$21,111,694 in private capital against a requested match of \$5,240,563 from the State – for a percentage split of [80% - Comcast] and [20% - State]. If selected for a grant, we anticipate completing the Project by December 31, 2024.

Describe how your proposal meets the needs of the community to be served as described in the "Guidelines."

The Project associated with this application will meet the needs of the Edgefield County community by providing fast, reliable, and scalable broadband infrastructure that will enhance Edgefield County residents' quality of life by enabling them to access online education, health, career, and community engagement opportunities. Today, many employment opportunities are disseminated via online sources. Enhanced access to broadband will enable residents to easily connect with potential employers. The Project will allow these residents to work from home seamlessly. Broadband access will also enable these local residents to take greater control over their health care. Residents will be able to remotely access important health-related resources, and technology, and communicate directly with health care providers. Furthermore, enhanced broadband access will allow currently unserved residents to pursue education – at all levels – from their own homes and on their own time, which will provide significant cost and time savings compared to the traditional in-person education experience. Without high-speed internet and increased broadband capacity, residents lack the connectivity they need to pursue modern education and compete in today's world. Furthermore, the Project's expanded availability of Gig internet speeds to home-based businesses and entrepreneurs will offer Edgefield County businesses access to vast online resources and a worldwide marketplace – further enhancing their reach. Comcast's proposed broadband network across Edgefield County will allow teleworkers to engage in online sales and marketing and increase the project area's attractiveness for entrepreneurs and start-up entities, creating economic development opportunities, and helping in the creation and retention of jobs.

If the proposed Project is in an area that is subject to an existing federal or state funding commitment for reliable speeds of 100/20 Mbps, explain why there is an identified need for additional broadband investment that is not met by existing federal or state funding commitments.

Not applicable to this application

Describe any plans or programs you have developed to improve adoption in the community described in this proposal.

Comcast is committed to making broadband accessible and affordable across the country and in Edgefield County. Eleven years ago, we launched Internet Essentials (“IE”), the nation’s largest high-speed internet adoption program for low-income households. Our IE program is available to all qualifying low-income customers in our service areas. Our IE program is the nation’s largest, most successful, and most comprehensive broadband adoption program for low-income households, and Comcast’s number one community impact initiative. Since its launch, we have made dozens of improvements to our IE program, including increased speeds and expanded eligibility — bringing IE to new audiences such as public housing residents, low-income veterans, seniors, and even community college students. Across South Carolina, we have connected over 64,000 low-income residents in 16,000 homes to the internet through our IE Program - most of them for the first time. IE currently provides customers with broadband service at speeds of up to 50 Mbps/10 Mbps for \$9.95/month (plus applicable taxes, fees and surcharges), as well as free digital skills training in person and online and access to low-cost computers, with no credit check, term contract, and cancellation fees. Recently we launched IE Plus, a new tier of IE, with speeds of up to 100/10 Mbps for \$29.95 per month (plus applicable taxes, fees and surcharges) and now give IE customers the ability to sign up for our Xfinity Mobile services. Current IE customers can upgrade to this plan, and new qualifying customers can subscribe directly. We also proudly participate in the federal government’s ACP program. Under the ACP program, qualifying customers may apply a credit of up to \$30 per month (\$75 per month in Tribal lands) to any Xfinity Internet service tier, including IE and IE Plus. Additional information about our IE and other community adoption programs is included in Attachment 3 - Internet Essentials, ACP, and Adoption Overview.

As part of the Project, explain how the Applicant will make efforts to increase digital literacy, for example, support through online training?

Comcast believes that digital literacy is one of the most important facilitators of getting people connected. Through its IE program, Comcast has partnered with hundreds of libraries, schools, and non-profit partners to deliver digital literacy training through a combination of classroom-style instruction and a portfolio of online training materials, including best-in-class curricula to engage the senior population. After connecting 10 million people to the Internet over the past ten (10) years, Comcast’s work to address digital inequities continues to build momentum, and this Project would aid in those efforts. In 2021, we launched Project UP, our comprehensive initiative to help ensure that everyone has the resources and opportunities they need to build a future of unlimited possibilities. Backed by a \$1 billion investment over the next decade, Project UP will provide tens of millions of Americans, including residents within this project area, with access to the technology, tools, and resources that will enable them to build skills, careers, and pathways to economic mobility in an increasingly digital society. Comcast’s Lift Zone initiative, which is part of Project UP and is described in more detail below, provides not only free internet connectivity but also access to hundreds of hours of educational and digital skills content to help families and site coordinators navigate online learning and increase digital literacy.

As part of the Project, identify any areas that the Applicant would be willing to provide public Wi-Fi in a central or community location to improve access for all South Carolinians and for what period of time.



As part of this Project, Comcast will look to work with nonprofit partners and community leaders to create safe spaces for students and families to connect and learn through our Lift Zone initiative. Lift Zones leverage community spaces such as churches, community centers, and other nonprofit locations to provide safe and reliable spaces for students and families to get online. One such example is the Lift Zone we activated in Charleston County in partnership with Tri-County Cradle to Career at the St. Julian Devine Community Center. Lift Zones help students get online, participate in distance learning, and do their schoolwork. The initiative provides not only free internet connectivity but also access to hundreds of hours of educational and digital skills content to help families and site coordinators navigate online learning and increase digital literacy. Lift Zones will augment the proposed Project by helping to connect low-income families to the internet so they can fully participate in the digital economy. All newly served customers within the Project Service Area will also have access to our over 20 million secure Xfinity Wi-Fi hotspots nationwide. Access to Comcast's 10,100 local Wi-Fi hotspots across South Carolina will help local customers to stay connected on the go as they travel around the state. Furthermore, Comcast will continue its commitment to connectivity in public locations throughout the Project Service Area during times of great need. A recent example of this commitment occurred during the height of the COVID-19 pandemic when Comcast offered free Xfinity WiFi hotspots in businesses and other locations throughout the country.

List documents that demonstrate your organization currently has the necessary funds to complete this project/proposal. Attach documents to this proposal.

Over the past three (3) years alone, Comcast has invested nearly \$110.3 million in private, at-risk capital in South Carolina, building, maintaining, and operating one of the most extensive fiber-based networks in the country. Comcast has decades of experience building broadband networks and a track record of success with completing projects on or ahead of schedule. We have partnered with public agencies to deploy broadband infrastructure in unserved areas in sixteen (16) different states, including South Carolina. For additional information on Comcast's experience and track record of building sustainable broadband networks through public-private partnerships please see Attachment 4 – Comcast's Prior Experience.

Comcast Cable Communications, LLC, is a wholly-owned, indirect subsidiary of Comcast Corporation, a publicly traded company that files copies of its Form 10-K Annual Reports with the United States Securities and Exchange Commission.

These reports are attached as Attachment 5 – 10K Annual Reports and serve as proof of financing. Because they are voluminous we are also providing electronic links to the prior three (3) years of Form 10-K Annual Reports below. Further, all financial reports can be found at: <http://www.cmcsa.com/annuals.cfm>.

2021: <https://www.cmcsa.com/static-files/8887f574-dfa9-4480-8c8b-ed7771f7ce44>

2020: <https://www.cmcsa.com/static-files/0ff6a41f-c1ff-4c25-b07e-4ec8424907cf>

2019: <https://www.cmcsa.com/sec-filings/sec-filing/10-k/0001166691-20-000008>

List any lease, franchise agreement, interconnection agreement, authorization, permit, or other items needed to complete this project.

We will require a new franchise agreement from Edgefield County, Edgefield, and Johnston communities. No new pole agreement is required.

Will the Project deliver broadband in the approved Project Service Area that meets or exceeds symmetrical download and upload speeds of 100/100 Mbps?

Yes

If no to above, explain and provide support demonstrating why the Project will not deliver such speeds and provide an affidavit that 100/100 Mbps symmetrical download/upload speeds are not practicable.

Explain how the Applicant will consult with the community in the Project Service Area on the general affordability needs of the target markets.

In every community we serve, Comcast is on a mission to drive digital equity through connecting the unconnected, providing digital skills training, and equitably distributing connected devices that allow unserved and underserved residents to participate and thrive in today's digital world. As part of this Project, we will become active advocates in the Edgefield County community to ensure we are continuing the advancement of this mission that drives us. As part of those efforts, Comcast will consult with the Edgefield County community to make sure we are considering the general affordability needs of the Project Service Area and to keep local officials and residents updated on our low-income service offerings and adoption efforts. We will also convene partners across multiple industries, community-based organizations, and government agencies in the Edgefield County community. One example of the partnerships we will pursue is our Internet Essentials Partnership Program (IEPP). Our IEPP is a program we have designed to help accelerate internet adoption in the communities we serve. Our IEPP provides the opportunity for local organizations to fund and quickly connect large numbers of students and families to reliable broadband access at home. Through our IEPP, which relies on local partnerships, sponsored students and families have access to all the benefits of IE and the option to purchase a low-cost computer. Through the trifecta of our IE offerings, IEPP, and our Lift Zones we will be able to address Edgefield County's connectivity needs in an affordable manner for local residents while also addressing other factors impacting broadband adoption, such as a lack of digital literacy skills, concerns about sharing personal information with providers in order to get service, equipment needs, and language barriers among others.

<p>Will the Project (1) prioritize investments in fiber-optic infrastructure wherever feasible and focus on projects that deliver a physical broadband connection by prioritizing projects that achieve last mile connections or ensure funded middle mile projects have commitments in place to support new and/or improved last mile service; (2) include affordability options and shall participate in ACP for the life of ACP; and (3) prioritize support for local networks owned, operated, or affiliated with local governments, nonprofits, and cooperatives.</p>	<p>No</p>
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If no to above, explain.

The Project will prioritize investments in fiber-optic infrastructure with a focus on delivering a physical broadband connection while also including affordability options and a commitment to participate in the federal government’s ACP program for the life of the program. However, the Project will not prioritize support for local networks owned, operated, or affiliated with local governments, nonprofits, and cooperatives because Comcast provides service over infrastructure that we fully construct, manage, maintain, and own and operate. Through our experience in building out sustainable broadband infrastructure around the country, we have found that full ownership of infrastructure allows for seamless network management and increased flexibility for network scaling to quickly meet evolving consumer needs. This model has allowed Comcast to serve municipal, educational, business, and residential customers in a way that meets or exceeds the connectivity goals of these groups. Full ownership of our infrastructure also promotes the proper distribution of resources, lessens consumer pass-through costs, and prevents potential discriminatory overbuilds that hinder competition and private sector investment. Further, Comcast believes full ownership of its network lessens the burdens that municipal-controlled fiber places on local communities. Such burdens include the diversion of funds from core services and considerable operational and maintenance costs – with such costs quickly surpassing initial construction costs. These costs are incurred because of ongoing maintenance and ever-increasing service demands, which necessitate regular upgrades. The recurring demands in support of broadband infrastructure are complex endeavors that require enormous funds and experience. Comcast is well positioned to meet these demands and has the experience, capability, and capital to construct, own, manage, maintain, and operate a sustainable broadband network in the Project Service Area.

<p>If awarded, will the Grant funds be used to overbuild another existing broadband provider or to reimburse expenses related to overbuilding another broadband provider?</p>	<p>No</p>
<p>If yes to above, explain.</p>	
<p></p>	
<p>Is there an identified need in the Project Service Area for additional broadband infrastructure that is not met by existing federal or state funding commitments?</p>	<p>No</p>
<p>If so, explain whether service to households and businesses in the Project Service Area should require a holistic approach that provides service to a wider area in order to make ongoing service of certain households or businesses within the service area economical.</p>	
<p></p>	

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## 5.1 - Project Sponsors

Entity Name	County of Edgefield
Entity Type (.e.g. Corporation, non-profit, cooperative, governmental entity)	Administration Office
Role within proposed project	Sponsor
Primary Contact Name	Roger LeDuc
Title	County Administrator
Mailing Address City, State, Zip	124 Courthouse Square, Edgefield, SC 29824
Phone Number	803.637.4000
Email	RLeduc@edgefieldcounty.sc.gov

## 5.2 - Project Sponsors

Entity Name	
Entity Type (.e.g. Corporation, non-profit, cooperative, governmental entity)	
Role within proposed project	
Primary Contact Name	
Title	
Mailing Address City, State, Zip	
Phone Number	
Email	

**5.3 - Project Sponsors**

Entity Name  
Entity Type  
(.e.g. Corporation, non-profit, cooperative, governmental entity)  
Role within proposed project  
Primary Contact Name  
Title  
Mailing Address City, State, Zip  
Phone Number  
Email


**5.4 - Project Sponsors**

Entity Name  
Entity Type  
(.e.g. Corporation, non-profit, cooperative, governmental entity)  
Role within proposed project  
Primary Contact Name  
Title  
Mailing Address City, State, Zip  
Phone Number  
Email


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## **6.1 - Attachment Checklist**

(Please attach the following items to application)

### **GIS Shapefiles**

<i>Proposed 2020 Census Blocks</i>	Yes
<i>Proposed Service Areas</i>	Yes
<i>Proposed Fiber/Cable Lines</i>	Yes
<i>Proposed Structures Served by Type</i>	Yes
<i>Proposed Network Junctions</i>	Yes
6.2 Signed affidavit certifying grant application is complete and accurate	Yes
Partners for financial support related to proposed project or non-cash support provide associated documentation.	Yes
Letters of support evidencing community need and strategic partnerships	Yes
Copies of Applicant's Current Fee Structure for all Internet Speed Tiers	Yes
Certificates of Insurance	Yes
Certificates of Bonding, as described in CFR § 200.326 Bonding requirements.	Yes
Any additional information evidencing community need for project	Yes