

**South Carolina 2022 ARPA 1.0
Priority Area SLFRF Comment Form**



ARPA 1.0 Comment Form
ONE form per project

ORS is NOT accepting any revisions to Grant Applications during the Comment Period. However, all ISPs are welcomed to comment on their own Grant Application(s) to notify ORS of any scrivener's error(s) that may exist. All comments will be published on the ORS website.

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| 1. Commenter's Name | Jeff Robinson |
| 2. Commenter's Email | jeff.robinson@wctel.com |
| 3. Commenter's Phone | 864-446-9234 |
| 4. Applicant Parent Organization Name | West Carolina Rural Telephone Cooperative, Inc. |
| 5. Applicant Legal Entity Name | WC Fiber, LLC |
| 6. Application Project Number | CHR-18 |
| 7. Application Project Name | Pickens County Broadband Expansion Project |
| REQUIRED 8. Is this a comment for a revision of your own ARPA 1.0 Grant Application (Yes/No) | No |
| 9. Do you have documentation and/or evidence to submit to the SC Broadband Office which supports your position? | Yes |

10. Application Comments

Comment # 1: There are numerous blocks in this application that were submitted with our FPR filing. We wanted to update ORS that we are currently building into these areas we committed to serve and will be finished ahead of the 6/30/23 commitment date. We would request that these blocks not be funded to overbuild our new fiber facilities currently being installed. Please refer to our FPR filing for a list of blocks.

Comment #2: Concern regarding fairness of the geographical structure of the application project area. During the FAQ period, ORS stated that a project must contain at least one priority block, and that the blocks within a project area must be contiguous. The exception would be if the provider had to build "through a served census block to connect an unserved and/or priority census block", then this would be allowed. This application does not appear to adhere to these requirements. The project area is essentially the entire county with large gaps between unserved areas. This creates an unfair advantage in two ways: (1) The applicant is allowed to include unserved blocks in the application that have no priority block nearby. A few examples would be blocks 450770110051052, 450770110051054, 450770105021009, and 450770102011008. Other applicants may have declined to apply for these areas because they do not meet the requirement of including a priority block. (2) The application scoring is heavily weighted on the size of the application. 30% is calculated based on total number of census blocks in the project area. 20% is based on total number of locations served. 10% is based on total land area within the project area. If the applicant is using the entire county as their project area, then their scoring will be unfairly inflated in each of these categories. Allowing the project area to be defined as the entire county with large gaps between unserved areas creates a fairness concern when this application is compared to other applications that adhered to the stated project area requirements.

Comment #3: In response to comments # 1 and # 2: If revisions to the application are allowed that affect cost, then this creates a fairness concern since cost data for all applications has been made public.