

**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.

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	GRE-01
7. Application Project Name	ARPA-2022-BSO-RBB-Greenwood
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: 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 450479701023019, 450479701012000, 450479701012002, 450479701012001, 450019501002033, 450479702014005, and 450479707022010. These are blocks that we have been asked to serve by the residents, and we would like to do so but can’t without grant funds. We would have applied for these areas but did not because there were no priority blocks nearby to meet the stated requirements. (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 # 2: In response to comment # 1: 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.