

# South Carolina 2023 ARPA Grant Program Application CPF 1.0



## Section 1.1 - Applicant Information

Legal Entity/Organization Name	Comcast Cable Communications, LLC
Parent Organization	Comcast Cable Communications, LLC
Entity Type (e.g. Corporation, non-profit, cooperative, governmental entity)	Corporation
Primary Contact Name	Melinda Little
Title	Vice President, Government Affairs
Mailing Address City, State, Zip	2605 Circle 75 Parkway SE, Atlanta, GA 30339
Phone Number	(713) 498-4299
Email	<a href="mailto:Melinda_Little@comcast.com">Melinda_Little@comcast.com</a>

## Section 1.2 - Project Name/Number

Project Number (Format XXX-XX)	GRE-02
Project Name	COMCAST-2024-BSO-GREENWOODCO
Project Priority (1-5, 1 serving as highest priority for applicant)	5

## Section 1.3 - Broadband Service Provider Context

Date of Applicant's Initial FCC Submission	Same as previously provided
Date of Applicant's Most Recent FCC Submission	December 30, 2022
Applicant has experience delivering broadband service via fiber and/or hybrid fiber-coax infrastructure (YES/NO)	Yes

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

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.

Will all structures be served with the same technology type?

Estimated Miles of Fiber to be Installed

Estimated Percentage Underground

Estimated Percentage Aerial

Fiber to the Premises Minimum Sustainable Download/Upload Speeds 100/100 Mbps	
Yes	
	71.85
	30.00%
	70.00%

## **Section 1.5 - Project Timeline** **(Maximum Timeline Allotted is 24 months)**

Project Start Date

Project Construction Activity Begins

Project Construction Activity Completion

	November 17, 2023
	June 1, 2024
	October 1, 2025

### **Customer Premises**

*Initiation of Operations (premise installations begin)*

Overall Project Completion Date

Will the project be completed within

24 months of official Notice to Proceed (NTP)?

	November 1, 2024
	November 28, 2025
Yes	

## **Section 1.6 - ESA Project**

Does this project include a Main Street Eligible Service Area?  
(YES/NO)

No
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## **Section 1.7 - Low Cost Plan**

**(Must be a minimum of 100/20 Mbps)**

What Download/Upload speed is offered in your low cost residential plan? (Example 100/20)

What is the monthly cost of the plan?

Does the above speed tier include unlimited data? (YES/NO)

Is a Consumer-based Contract Required? (YES/NO)

Is the pricing fixed? (YES/NO)

If no, what's the duration?

100/20 Mbps	
	\$29.95
Yes	
No	
Yes	

# South Carolina 2023 ARPA Grant Program Application CPF 1.0



## Section 2.2 - In-kind Match (for Main Street Projects only)

Type	Description	Qty	Rate	Amount
In-Kind Match				
In-Kind Match				
In-Kind Match				
In-Kind Match				
In-Kind Match				
In-Kind Match				
In-Kind Match				
Total				\$ -

Total Project Cost and In-Kind Match	#REF!
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## Section 2.3 - Funding Details

Description	Comment	Amount
South Carolina ARPA Broadband Grant Program Funds requested		\$ 1,875,330.32
Applicant-Provided Funding		\$ 2,114,734.19
Third-Party Funding Source (if applicable) - List Source		\$ -
In-Kind Match (for Main Street Projects only)		\$ -
Total Project Cost		\$ 3,990,064.50
Percentage Funds Requested from SC Broadband Office		47.00%
Percentage Funds from Applicant Match		53.00%
Percentage Funds from Third Party Funding Source		0.00%
Percentage Funds from In-Kind Match		0.00%

ADJUST APPLICANT  
PROVIDED FUNDING  
AMOUNT TO GET WHOLE  
PERCENTAGES ONLY

# South Carolina 2023 ARPA Grant Program Application CPF 1.0



## Section 3.1 Confirmations

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

Agree

Applicant will provide at least one low-cost residential option without data usage caps at a minimum speed of 100/20 for a documented period of time.

Agree

The Project will comply with the requirements set forth in ARPA, South Carolina Act No. 244 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, including covered telecommunication and video surveillance services or equipment provided or produced by entities owned or controlled by the People's Republic of China and telecommunications equipment produced by Huawei Technologies Company or ZTE Corporation (or any subsidiary or affiliate of such entities).

Agree

The Applicant, to the extent practicable and consistent with applicable law under the award, will provide a preference for the procurement or use of goods, products, or materials produced in the United States as described in 2 C.F.R. 200.322 and Executive Order 14005 Ensuring the Future is Made in All by All of America's Workers (January 25, 2021).

Agree

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

Agree

The Project includes pre-project Engineering uses or costs

Agree

If Yes to above, the pre-development Engineering uses or costs will be (1) tied to an eligible broadband project or reasonably expected to lead to such a project; (2) necessary for the efficient and timely performance of eligible Projects; and (3) incurred after March 15, 2021, but prior to execution of the Grant Agreement.

Agree

Applicant will encourage its employees, contractors, and subcontractors to adopt and enforce on-the-job seat belt policies and programs for their employees when operating company-owned, rented or personally owned vehicles pursuant to Executive Order 13043, 62 FR 19217 (April 8, 1997).

Agree

Applicant will encourage its employees, contractors, and subcontractors to adopt and enforce policies that ban text messaging while driving.

Agree

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 2023 ARPA Grant Program

## Application CPF 1.0



### **4.1 - Additional Information**

(max 2000 character limit per item except item 1)

Provide a Summary Narrative that describes your project.

**This narrative must be unique for each project and discuss this project only. Refrain from discussing rates, structure counts, estimated dates, work that occurred in the past, or the Company's history of providing Broadband service. Limit 750 Characters.**

Comcast submits this application for its Greenwood County Project in response to South Carolina's 2023 ARPA CPF Grant Program. This application proposes to construct a majority Fiber-to-the-Premises ("FTTP") network using fiber-optic Ethernet Passive Optical Network ("EPON") technology that will be capable of providing gigabit symmetrical broadband to homes, businesses, and anchor institutions across the Project Area. The Project Area contains 37 unserved census blocks (CB) and 57 partially served CB. Further, these CB contain 6 priority areas including: 7 Difficult Development Areas as identified by HUD and 51 areas with high concentrations of public K-12 student households.

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

The proposed broadband network will improve the community's quality of life by enabling residents to expand career pathways, increase economic development and engagement, access and engage in telehealth opportunities, bridge digital skills gaps, pursue education, and more. In addition to the 18 I Need Internet Survey respondents included within the Project Area, Comcast surveyed residents in the Project Area and 34 indicated support for this application's proposed broadband network (Attachment 5).

Today, the majority of employment opportunities are disseminated via online sources. Access to broadband will enable residents of Greenwood County to easily search for and apply to open job listings and communicate with potential employers. It will also allow such residents to work from home. The proposed broadband network will also enable teleworkers and local businesses to engage in online sales and marketing and increase the area's attractiveness for entrepreneurs and start-up entities, creating economic development opportunities and supporting job retention. Broadband access will also enable residents to take greater control over their health care by remotely accessing important health-related resources and technology, as well as communicating directly with healthcare providers. Furthermore, with access to broadband, residents will be able to pursue education from their own homes and on their own time, which could provide significant savings compared to an on-campus traditional education experience. Online courses can be taken by anyone: homeschooled children, college students, entrepreneurs, freelancers, officegoers, and retirees. Education resources such as those offered by universities allow students to obtain a degree at their own pace and schedule without the added costs of on-campus life. Without high-speed Internet and increased broadband capacity, residents lack the connectivity they need to pursue modern education and compete in today's world.

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 your plans or programs you will implement to improve adoption in the community described in this proposal.

As part of the proposal, Comcast will drive broadband adoption through a variety of means across the Project Area including direct mail, engaging local media, and direct grassroots outreach in the community. Comcast will also drive adoption through the promotion of its affordable subscriber options, Internet Essentials ("IE"), IE Plus, and the federal government's Affordable Connectivity Program ("ACP") to eligible residents. Under Comcast's IE offering – the most comprehensive and successful low-income broadband adoption program in the nation – qualifying households can obtain broadband service at speeds of up to 50Mbps/10Mbps for \$9.95/month (plus applicable taxes, fees, and surcharges), or speeds of up to 100Mbps/20Mbps for \$29.95/month (plus applicable taxes, fees, and surcharges), as well as free digital skills training in person and online. Eligible IE customers also have the option to purchase a low-cost Internet-ready computer. Under ACP, qualifying households may receive a credit of up to \$30/month (\$75/month in Tribal lands) toward any Xfinity Internet service tier, including IE and IE Plus, and/or Xfinity Mobile service.

All Project Area residents interested in Comcast's services will be able to sign up for service by calling Comcast's toll-free telephone number, using Comcast's website, or in person at the nearest Xfinity store. Comcast employs sales, marketing, and call center professionals – skilled in addressing product and service questions – to support these efforts. If conditions allow, a public meeting or event can be held with the local leaders and other key stakeholders to inform residents about the upcoming work and answer questions. Comcast will also host sign-up events and partner with local community organizations and non-profit groups to further broadband adoption in the Project Area. Comcast's Digital Navigators Program will also support adoption by bringing technology instructors into the Project Area to aid residents.

Describe your plans or programs you have developed and will implement to increase digital literacy, for example, support through online training, for this project?

Comcast promotes the development of digital skills in communities by investing in hyper-local organizations and special projects that build digital literacy skills for today's workforce economy. This work includes increasing basic digital and tech skills; advancing skills in online banking, telehealth, online safety, career development and STEAM; accelerating broadband adoption; expanding workforce training/certifications for adults; strengthening and forging partnerships to meet local business and community needs, and by Digital Navigator programs. 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. Eligible IE customers have access to free digital skills training in person and online. IE customers will also be eligible to purchase a low-cost Internet-ready device.

Through Project UP, Comcast's comprehensive initiative to advance digital equity and build a future of unlimited possibilities, Comcast is committing \$1 billion to help ensure everyone has the resources and opportunities they need to participate and excel in today's digital world. Project UP encompasses the programs and community partnerships across Comcast, NBCUniversal, and Sky that connect people to the Internet, advance economic mobility, and open doors for the next generation of innovators, entrepreneurs, storytellers, and creators. 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 free 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. In 2020, Comcast established its award-winning Lift Zones initiative to complement the Internet Essentials program. Working with its network of thousands of non-profit partners and city leaders, Comcast launched more than 1,250 Lift Zones by the end of 2022.

Lift Zones provide free, robust WiFi in community centers to support students who, for a variety of reasons (including homelessness or housing insecurity), are simply unable to participate in distance learning at home. 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 also serve diverse adult populations, as they enable access to hundreds of hours of free digital skills training for remote work, telehealth services, and more. All newly served customers within the Project Area will also have access to our over 22.5 million secure Xfinity Wi-Fi hotspots nationwide. Access to Comcast's 11,000 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 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.

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 Area on the general affordability needs of the target markets.

Comcast is committed to serving all residences and businesses across the Project Area on a nondiscriminatory basis with a variety of affordable service options. In every community it serves, 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, Comcast will work with the local community to ensure it is continuing the advancement of this mission.

As part of those efforts, Comcast will consult with the community to make sure it is considering the general affordability needs of the Project Area and to keep local officials and residents updated on its low-income service offerings and adoption efforts. Comcast will also convene partners across multiple industries, community-based organizations, and government agencies in the community. One example of the partnerships Comcast can pursue is its Internet Essentials Partnership Program ("IEPP"). Comcast's IEPP is designed to help accelerate internet adoption in the communities it serves. 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 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 Comcast's IE offerings, IEPP, and its Lift Zones Comcast will be able to address the community'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.

What network resiliency strategies will be leveraged to ensure facilities remain operational?

Over the last three years, Comcast has invested over \$135 million towards technology and infrastructure upgrades in support of its South Carolina network. Comcast's network investments have ensured that its network is resilient and that it delivers the service customers expect. On most days, Comcast conducts approximately 500,000-700,000 speed tests across its entire network. Average speeds to customers (both downstream and upstream) have generally remained at or above 105% of advertised speeds since January 2023 in all regions.

Related to network resiliency during severe weather, Comcast has a robust storm preparedness approach to get customers back online with the services they rely on. As part of that approach, Comcast takes multiple measures including: strengthening standby power resources; positioning fuel trucks, cable, and fiber materials across impacted areas for quick restoration work; making emergency backup communication devices available; mobilizing national frontline teammates; and coordinating closely with local and state leaders and emergency management personnel, among other measures. Comcast also implements network hardening and underground routing contingencies when possible during the engineering and design stages of our broadband deployments to further enhance resiliency and ensure continued operations.

In further support of network resilience, customers across the Project Area will be eligible for Storm-Ready Wifi ("SRW"), an Xfinity product planned to launch this year. SRW is currently anticipated to cost \$7 per month and is a cellular data backup device to Xfinity Gateways that allows customers to stay reliably connected through network and power outages. If the Xfinity Storm-Ready device detects the Gateway is no longer receiving an internet signal, the device will automatically enable a 4G LTE cellular back-up and broadcast a replacement WiFi internet signal for their home network for up to four (4) hours.

<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>
<p>If no to above, explain.</p>	
<p>The project will prioritize investments in fiber-optic infrastructure with a focus on delivering physical broadband connections 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 its experience in building sustainable broadband infrastructure around the country, Comcast has 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 infrastructure ownership 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 Area.</p>	
<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>	

# South Carolina 2023 ARPA Grant Program Application CPF 1.0

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## 5.1 - Project Sponsors

Entity Name	Greenwood County
Entity Type (.e.g. Corporation, non-profit, cooperative, governmental entity)	Governmental Entity
Role within proposed project	Supporter
Primary Contact Name	Toby L. Chappell
Title	County Manager
Mailing Address City, State, Zip	528 Edgefield St. Greenwood, SC 29646
Phone Number	864.942.8501
Email	n/a

## 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	



# South Carolina 2023 ARPA Grant Program Application CPF 1.0



## 6.1 - Attachment Checklist

(Please attach the following items to application)

### GIS Shapefiles

<i>Proposed 2020 Census Blocks</i>	Yes
<i>Proposed Fiber/Cable Lines</i>	Yes
<i>Proposed Structures Served by Type</i>	Yes
<i>Existing <del>Fiber/Cable Lines</del> Network Junctions</i>	Yes
Signed affidavit certifying grant application is complete and accurate	Yes
Proof of funding related to proposed project or non-cash support, provide associated documentation e.g. yearly financial reports, bank statement, etc.	Yes
Letters of support and strategic partnerships	Yes
Copies of Applicant's Current Fee Structure for all Internet Speed Tiers	Yes
Certificates of Insurance	Yes
Main Street Work Plan	No
Any additional information evidencing community need for project	Yes