

Comments by Annabel V. Felton, Chair, Duaneburg Broadband Committee to the  
Initial Proposal, Volume I, Broadband Equity, Access and Deployment (BEAD) Program  
<https://broadband.ny.gov/broadband-deployment-initial-proposal>

December 6, 2023

Regarding Unserved or Underserved Locations (Requirement 5)

The Town of Duaneburg is at the western end of Schenectady County and has a cable franchise agreement with Charter Communications, Inc. (d/b/a Spectrum). For purposes of the BEAD Program Schenectady is not a rural-classified county and is therefore ineligible for grant funding under this initial proposal. Incumbent service providers in cable franchise areas continue to require expensive line extension payments to provide service in low density areas. Locations “eligible” for BEAD funding, therefore, should also include any location in a cable franchise determined to be in a line extension area that requires a Contribution in Aid of Construction (CIAC) pursuant to New York State Department of Public Service Regulations (NYCRR) section 895.5

Language exempting “confidential commercial information from disclosure” (see last paragraph at page 30) should not be part of this deployment plan. The competitors of incumbent providers have access to service area information from other sources. This exemption allowance serves only to obfuscate and hide information needed for good public policy and from the very taxpayers who are grant funding these line extensions. Incumbent provider claims of confidential information are what brought us deplorable broadband service maps in the first place. Do not allow it to continue.