



INDEPENDENT TELEPHONE & TELECOMMUNICATIONS ALLIANCE

April 9, 2010

Mr. Nicholas Fraser
OMB Desk Officer
Washington, DC

RE: OMB Control Number 0660-0031

Dear Mr. Fraser:

The Independent Telephone and Telecommunications Alliance (ITTA) appreciates the opportunity to submit comments in the above referenced matter regarding the National Telecommunications and Information Administration's (NTIA) proposed collection of information related to the Broadband Technology Opportunities Program (BTOP). The proposed collection of information by NTIA would seek comments during a 15-day window from broadband providers regarding applications for grants under BTOP.

ITTA represents mid-size local exchange carriers providing voice, video and data service to more than 24 million customers in 44 states. ITTA's members, on average, make broadband available to 85-90 percent of their customers today. As such, projects funded under BTOP can directly affect ITTA's members both in terms of members that apply for BTOP funding, and those projects by other entities which would be located in areas currently served by ITTA members.

Specifically, ITTA is concerned that the proposed 15-day review window is insufficient to allow broadband service providers adequate time to review proposals and provide meaningful comments to NTIA. During the first round of BTOP funding, which allowed for a 30-day review period, ITTA members found it challenging to adequately review and respond to applications. NTIA has already received 867 applications totaling more than \$11 Billion for Round Two BTOP funding.¹ Given the sheer volume of applications, it is unrealistic to expect providers, like ITTA's members, to thoroughly review the applications and provide any type of meaningful response to NTIA.

ITTA has long advocated that funds awarded under BTOP not be used to construct or expand networks in areas where an incumbent provider is already offering broadband service. Funding

¹ Commerce Announces Continued Demand For Funding To Bring Broadband to More Americans , April 7, 2010
(available at <http://www.ntia.doc.gov/press>)

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duplicative networks with public funds creates a competitive disadvantage for incumbent providers, and unnecessarily diverts funds from areas where no broadband service is available today. Without input from ITTA members and other existing broadband service providers as to where service is offered today, NTIA will be challenged to ensure that grants awarded under BTOP are not funding duplicative networks. Forty-one members of Congress also recognized the inadequacy of a 15-day review period in a letter sent to NTIA Administrator Strickling on March 11, 2010.²

In a time when demand is high and public resources are scarce, we must ensure that funds awarded under BTOP are done so in as effective and efficient manner as possible. To do this, all parties must be given adequate time to respond to applications for funding in a thorough and meaningful way. The proposed 15-day review period is not adequate, and should be extended to 30-days, as was the case for Round One.

ITTA appreciates the opportunity to provide comments on this important proposal. If we can be of further assistance, please do not hesitate to contact me at 202-898-1520 or cstamp@itta.us.

Sincerely,



Curt Stamp
President

² Letter to Lawrence Strickling from Congressman Bart Stupak et al, March 10, 2010