May 3, 2010

Hon. Lawrence E. Strickling  
Assistant Secretary for Communications & Technology  
National Telecommunications and Information Agency  
U.S. Department of Commerce  
Herbert C. Hoover Building  
1401 Constitution Avenue, NW  
Washington, DC 20230  

Dear Assistant Secretary Strickling:

On behalf of the Commonwealth of Pennsylvania, I would like to thank you for the opportunity to provide state input to your review process for the determination of Round Two funding through the Broadband Technologies Opportunity Program (BTOP). Approximately 62 applications filed in Round Two aim to serve some part of the commonwealth.

We take our role in the review process seriously. To get the benefit of perspectives from outside of state government, we assembled a team of subject matter experts (SMEs) with a breadth and depth of experience and asked regional economic development partners to weigh in on proposals affecting their areas.

Our review, though, was limited by the tight review window and the limited information we could access for each proposal. We understand that the NTIA will perform a detailed analysis of each proposal’s technical feasibility, financial feasibility, return on investment, and compliance with the NOFA. Also, we are unable to verify the reasonableness of the overall costs requested by applicants to execute the project, the particulars of the proposed budget, and the sufficiency of the proposed match. We understand that these factors will be considered thoroughly by the NTIA as part of its due diligence process.

We used the following process to evaluate the proposals:

**Self-assessment by BTOP applicants** – The commonwealth asked all 62 applicants to supply a copy of the executive summary for their proposal and to complete a self-appraisal form to:

1. explain how their grant application supports the goals of BTOP and the priorities of the commonwealth’s Statewide Broadband Plan;
(2) explain the reasons its project best meets the needs and priorities of the state; and
(3) select the predominant subject matter area from which the commonwealth would seek more detailed review.

The 17 applicants who declined to complete this self-assessment did not progress further in the commonwealth’s review process.

Regional reviews - The commonwealth then circulated copies of applicant self-assessments to ten Regional Partners (seven (7) Local Development Districts and three (3) economic development entities) to review and assess all projects within their respective regions.

Subject Matter Expert (SME) input - Concurrently, the commonwealth convened a panel of twelve (12) Subject Matter Experts (SME) and other select stakeholders. This allowed the commonwealth to gain input and perspectives from other public and private sector interests and disciplines (health care, public safety, local government, K-20 education, libraries, technical/industry, economic development, rural needs, social services and community development, elderly, workforce development, and regulatory).

Final review and prioritization by the commonwealth - After compiling all of the applicant and reviewer input, the commonwealth team (Office of Administration, Governor's Office, and Department of Community & Economic Development) held internal deliberations and finalized the official state response contained herein.

45 applicants responded to the commonwealth’s request for the self-assessment and were reviewed by SMEs, regional partners, and the commonwealth team.

There are 11 proposals which we Recommend (listed alphabetically by applicant) to the NTIA for funding consideration. These proposals best meet the goals and priorities identified in the commonwealth’s Statewide Broadband Plan and will serve many parts and diverse needs of the state as well as the vulnerable populations targeted by the broadband stimulus grant program:

<table>
<thead>
<tr>
<th>Recommend</th>
<th>Easy Grant ID #</th>
<th>Project Type</th>
</tr>
</thead>
<tbody>
<tr>
<td>Armstrong, County of</td>
<td>6966</td>
<td>Comprehensive Community Infrastructure</td>
</tr>
<tr>
<td>Com Pros, Inc</td>
<td>7199</td>
<td>Comprehensive Community Infrastructure</td>
</tr>
<tr>
<td>Conneautville, Borough of</td>
<td>6348</td>
<td>Public Computer Center</td>
</tr>
<tr>
<td>Delaware County Library System</td>
<td>4657</td>
<td>Comprehensive Community Infrastructure</td>
</tr>
</tbody>
</table>
* Three proposals affecting the City of Philadelphia have been submitted as part of the “Freedom Rings” initiative, which is a coordinated effort to address distinct broadband needs in the City: (1) one Infrastructure proposal (Wilco Electronic Systems #4266); (2) one Sustainable Broadband Adoption proposal (Greater Philadelphia Urban Affairs Coalition #6787); and, (3) one Public Computer Center proposal (City of Philadelphia #4664). A fourth project in Philadelphia (Philadelphia Housing Authority #6670), also a Public Computer Center, more narrowly focuses on serving the interests of the residents of the Philadelphia Housing Authority. Each Philadelphia project stands on its own but there is important synergy between them and we would ask NTIA to consider these applications with their collective goal in mind.

Finally, one proposal submitted by Zito Communications II, LLC, (#4198), was recommended by the Commonwealth during Round One, but is not being recommended in Round Two because its proposed coverage area would overlap a significant portion of a region funded by NTIA in its Round One Middle Mile Infrastructure award to the Commonwealth (Easy Grant ID# 28).

We hope that you find our recommendations useful in your deliberations and final decisions regarding which proposals to approve for Round Two ARRA Broadband funding.

Sincerely,

Naomi Wyatt
Secretary of Administration
June 18, 2010

Hon. Lawrence E. Strickling
Assistant Secretary for Communications & Technology
National Telecommunications and Information Agency
U.S. Department of Commerce
Herbert C. Hoover Building
1401 Constitution Avenue, NW
Washington, DC 20230

RE: Zito Communications (BTOP Application #4198)

Dear Assistant Secretary Strickling:

This serves as a follow-up to the Commonwealth’s Round 2 BTOP state recommendation letter dated May 3, 2010.

Because of the quick turn-around required for the state recommendation letters, we did not have the time to fully explore every BTOP funding request. Since our letter, however, we have looked more closely into several of the more promising grant applications. One submitted by Zito Communications (Application #4198) is proving to be an excellent complement to the Commonwealth’s middle mile grant secured in Round One (Application #28).

As there exists a significant dearth of broadband in northwest and northcentral Pennsylvania, we believe multiple projects in the same area can and should be funded. Given the shared geography, the Commonwealth believes there are synergies between the Commonwealth’s Round One funded project (Application #28) and Zito’s Round 2 proposal. The projects can potentially complement one another.

Please consider this letter as an addendum to our May 3, 2010, recommendation letter. In light of the above, the Commonwealth also recommends the Round 2 submission from Zito Communications (Application #4198).

Respectfully submitted,

Naomi Wyatt
Secretary of Administration

cc: Ian Martinez, BTOP State Review Coordinator
Steve Crawford, Governor’s Chief of Staff
Hon. Joe Scarnati, State Senator 25th District
Steve Zwerin, Zito Communications