

Office of the Governor

April 30, 2010

The Honorable Lawrence E. Strickling
Assistant Secretary for Communications and Information
United States Department of Commerce
Washington, D.C. 20230

(via E-mail to imartinez.@ntia.doc.gov)

Dear Assistant Secretary Strickling:

I am writing to you in response to your invitation to comment on Broadband Technology Opportunity Program (BTOP) applications for Round Two grant proposals within Wyoming by May 3, 2010. The American Recovery and Reinvestment Act of 2009 (Recovery Act) authorizes the U.S. Department of Commerce's National Telecommunications and Information Administration (NTIA) to consult with states regarding allocation of grants funds to projects affecting each state.

Mr. Rob Hurless, my energy and telecommunications policy advisor, has worked with a team of specialists to prepare these comments. Mr. Hurless has been assisted by Mr. Alan B. Minier, Chairman of the Wyoming Public Service Commission, and Mr. Bob von Wolffradt, Wyoming Chief Information Officer. Mr. von Wolffradt is also responsible for Wyoming's participation in the national mapping project under the Broadband Data improvement Act and the Recovery Act.

The team identified all of the BTOP program applications filed under Round Two that propose to serve areas of Wyoming by visiting the Broadband USA Web site and searching the applications database for applications with proposed project areas in Wyoming.¹ We have chosen to confine our comments to proposals of particular interest.

The team selected four projects with qualities in common. The projects deploy broadband infrastructure, enhance broadband capacity at public computer centers, provide more effective cardiovascular disease (CVD) ambulatory diagnostic, therapeutic, and educational telecardiology program, and promote job creation and stimulate long-term growth and opportunity especially in rural areas of Wyoming.

The four projects are shown in Table 1 below.

¹ <http://www.ntia.doc.gov/broadbandgrants/applications/search.cfm>

Table 1				
Broadband USA applications for Wyoming				
Application ID	Applicant	Project Title	Project Type	Grant Request
6008	HOT SPRINGS GREATER LEARNING FOUNDATION, THERMOPOLIS, WY	Big Horn Basin Wyoming Center	Public Computer Center	\$4,000,000
6522	WYOMING HEALTH INFORMATION ORGANIZATION (WYHIO), CHEYENNE, WY	Southeast Wyoming Telehealth Network: Telecardiology Program (SEWTNTCP)	Sustainable Broadband Adoption	\$404,856
7080	SILVER STAR TELEPHONE COMPANY, INC. FREEDOM, WY	Delivering Opportunities: Investing in Rural Wyoming Broadband	Comprehensive Community Infrastructure	\$5,063,623
7357	SILVER STAR TELEPHONE COMPANY, INC. FREEDOM, WY	Expanding Greater Yellowstone Area Broadband Opportunities	Comprehensive Community Infrastructure	\$5,608,179
	Total			\$15,076,658

The first two proposals; from the Hot Springs Greater Learning Foundation (App # 6008), and the Wyoming Health Information Organization (App #6522), represent very special efforts to support the proposals with sophisticated broadband planning strategies and thoughtful academic analysis. Each of the proposals will fill a necessary space in the efforts of many important Wyoming partnering entities. Each of the proposals is based on credible project leadership and community involvement.

In particular, App # 6008, Hot Springs Greater Learning Foundation proposal is also supported by Engrossed House Bill 0239, Enrolled Act No. 116, passed during the 2009 Wyoming legislative session. I support community leadership working creatively to craft solutions that work at the local level. The idea of using the attributes of Hot Springs State Park and the many unique geological characteristics of the community of Thermopolis as the organizing principle for a computer center is the embodiment of a real world local solution. It is also a key strategic location geographically for the entire northern tier of our state.

The extensive partnerships with both private and public sectors entities set forth in Hot Springs proposal will go a long way toward aggregating demand that is so important to small, rural markets. These small, remote markets are often not understood by decision makers in larger, suburban, or urban settings. The Hot Springs applicant's insight into using the Public Computer Center approach as the glue holding together many seemingly diverse activities is key to the viability and sustainability in a rural community setting. Diversity of activity is not just a desirable goal it is likely a necessity for a project of this nature to be successful. Therefore, the range of activities and partners that might lead a reviewer to question the focus of the application is actually the indispensable heart of the proposal. Hot Springs obviously demonstrates both a thorough understanding of this concept and the hard work necessary to completing the application.

Southeast Wyoming Telehealth Network: Telecardiology Program (SEWTNTCP), App # 6522, will provide, via TeleHealth, the ability to "transport" medical specialists to rural facilities/communities. This is critical because Wyoming is a frontier state, where 509,294 people live in 97,100 square miles. It is currently 50th in population and 9th in size. Wyoming ranks 45th in physicians per 100,000 population and 50th in medical specialists per 100,000 population. Of the state's 23 counties, 15 qualify as primary care Health Professional Shortage Areas. The lack of cardiovascular specialists (total 19) in the state, significantly impacts the ability to offer acute and chronic care for Cardio Vascular Disease (CVD) patients. This situation is further aggravated by the challenges of distance, geography, inclement weather, and isolated communities.

A solution to this problem is the use of telehealth which provides the ability to "transport" specialists to rural facilities. The proposed program will result in more effective and efficient CVD care utilizing broadband network connections. The program will develop and implement "best practices" in CVD treatment through telehealth and create a sustainable model to include stroke, trauma, psychiatry, and other clinical services throughout the state.

The third and fourth applications, from Silver Star Telephone Company, Inc. (Silver Star) provide critical additional investment in backbone infrastructure facilities. A special priority for broadband stimulus in Wyoming is to complete a statewide fiber network with redundant, self-healing network architecture capable of supporting a robust broadband environment. Of course, connection to neighboring community of interest in Idaho is also a valuable improvement. The broadband steering committee has identified several physical infrastructure gaps that need to be addressed for the benefit of numerous entities and many of our citizens to provide modern broadband access and enable next generation, IP-enabled 911 and coordination, as well as electronic access to government, education, commerce, health, telework, and e-safety. This type of focus will encourage scalability and flexibility of projects. Although the projects ambitiously cross some of the most challenging terrain, the information in Silver Star's filings show credible evidence of their ability to complete the project in an appropriate manner.

We would underscore the fact that the need for completion of the project was discussed with, and within, Wyoming's telecommunications industry following the initial announcement

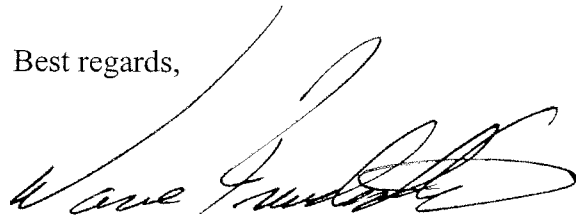
that ARRA funding might be available for this important infrastructure project. Without ARRA funding, we believe it will be many years before market forces alone will address this need.

Silverstar proposes to close an approximate 86 mile “gap” between the endpoints of an existing 960 route mile fiber network traversing nearly two-thirds the state of Wyoming. The “gap” is located in northwest Wyoming, between Togwotee Pass (on the continental divide) and Jackson, *Jackson - Moran - Togwotee*. When completed, this project will promote broadband network opportunities for 11 counties and 26 communities in Wyoming. Beneficiaries will include the University of Wyoming and five 2-year institutions (community colleges), 222 Wyoming Public Schools, 42 Participating Facilities (hospitals, community mental health centers, and substance abuse clinics) in the Wyoming Telehealth Network,² WYOLINK,³ and other local and statewide emergency response teams and related initiatives.⁴ Industry estimates place the cost of this proposed project at over 7 million dollars. Silver Star proposes to construct this project with a 22% cost match.

Silver Star also proposes to close an approximate 33-mile “gap” over Teton Pass between Wyoming and Idaho, *Jackson - Teton Pass - Victor, ID*. This will connect areas that have been isolated from other communications carriers, business entrepreneurs, health care providers, educational facilities, and community services. When completed, this project will create the capacity for new broadband network opportunities for 11 counties and 26 communities in Wyoming, and the same list of possible beneficiaries listed above. The proposed project is estimated to result in 69 created or saved jobs. Industry estimates place the cost of the Jackson, WY to Victor, Idaho Middle Mile Fiber Optic Project at almost 6.3 million dollars.

In conclusion, please accept these comments and explanations. If you have any questions or concerns, please contact Mr. Hurless.

Best regards,



Dave Freudenthal
Governor

DF:pjb

c: Ian Martinez, Senior Adviser and Director of Outreach, NTIA

² Note: WYOMINGTELEHEALTH NETWORK, Proposal to FCC Rural Health Care Pilot Program www.fcc.gov/cgb/rural/rhcp.html, Wyoming [Part 1].

³ Wyoming Homeland Security Communications Initiative; <http://wyolink.state.wy.us>.

⁴ <http://wyohomelandsecurity.state.wy.us/main.aspx>.