



Keystone Initiative Network Based Education & Research
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Doug Kinkoph
Program Officer
National Telecommunication and Information Administration
Broadband Technology Opportunities Program
U.S. Department of Commerce, Room 4812
14th and Constitution Avenue NW
Washington, DC 20230
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202.482.4186 office

Re: Keystone Initiative for Network Based Education and Research (KINBER)
Pennsylvania Research and Education Network (PennREN) Project

Dear Mr. Doug Kinkoph,

ANEPA EA describing the KINBER PennREN project was submitted to the NTIA in August of 2010 and a FONSI was subsequently issued by the NTIA on 9/28/2010. Although the physical activities that are required to undertake and implement the project remain unchanged, a portion of the project route has been revised due the KINBER's need to engage a different construction partner.

Fibertech Networks, LLC of Rochester, NY had done the pre-engineering work for the NTIA proposal and subsequent EA submittal. KINBER was unable to enter in to a contract for construction with Fibertech. KINBER has now engaged Sunesys, LLC out of Warrington, PA to construct the network. This new vendor is completing the detailed design work now necessary to perform the actual construction which is necessitating changes to the proposed route.

The revised route now encompasses a total length of 1,591 miles, a decrease from the 1,696 miles described in the 2010 EA. The primary reasons for the revised route are to (1) utilize existing aerial structures, (2) avoid sensitive environmental areas, and (3) utilize existing SUNESYS plant for overlash construction. Specifically, the overlash consists of 375 miles in the Pittsburgh and Philadelphia areas that takes advantage of the "no make ready construction" while providing a timely completed product. The revised route now consists of:

- 838 miles originally included in the 2010 EA and anticipated in the 2010 FONSI.
- 743 miles not included in the 2010 EA or anticipated in the 2010 FONSI, but now confirmed to be exclusively aerial on existing utility poles.

This request does not require any change in budget and completely falls within the original Public funded Service Area.

We are requesting your approval to proceed with installation of the 743 miles of confirmed aerial route. We understand that this work would necessarily be undertaken consistent with the findings in the 2010



FONSI and in full compliance with the identified protocols and environmental protection measures described in the 2010 EA and referenced in the 2010 FONSI.

Although it is anticipated that the majority of the project will be aerial, using existing utility poles within transportation rights-of-way, existing underground conduit and existing conduit systems associated with bridge crossings will also be used.

Sunesys does not anticipate replacement of any existing utility poles as a result of this project. In the event that a utility company deems it necessary to replace a pole, current utility construction procedures for pole replacements do not result in any ground disturbance. Should the replacement of a pole require ground disturbance, Sunesys will follow the protocol that has been developed within the current EA. If Sunesys or a Sunesys contractor or subcontractor has to replace a pole which requires ground disturbance, continued consultation will occur with the Pennsylvania Department of Environmental Protection, Pennsylvania Department of Conservation and Natural Resources, the U.S. Army Corps of Engineers (ACOE), the U.S. Fish and Wildlife Service (USFWS), the State Historic Preservation Office (SHPO), PA Fish and Boat, PA Gamelands and any other agencies requesting notification before such pole replacement is undertaken.

We have received a response from the U.S. Fish and Wildlife Service in regards to the route changes noted above. In summary, they have responded by following the same plans as outlined in the original letter which is consistent in the Approved Environmental Assessment.

Sensitive areas are defined as those within:

- Federal wetlands;
- Areas of concern identified by the Pennsylvania Department of Conservation and Natural Resources;
- State Game Lands identified by the Pennsylvania Game Commission; and
- Wetlands within Monroe, Carbon, Northampton, Lehigh, Bucks, Montgomery, Berks, Schuylkill, Chester, Lancaster, Lebanon, York, Adams, or Cumberland counties, as identified by The U.S. Fish and Wildlife Service.

Sincerely,
Jeff Reel

KINBER Executive Director