U.S. Department of Commerce
National Telecommunications and Information Agency
Broadband Technology Opportunities Program

External Stakeholder Round One Application Concerns and Recommendations

The following represents concerns and issues submitted by external stakeholders in response to the Public Notice in the Federal Register on July 16, 2009 (75 Fed. Reg. 34558) regarding BTOP's Round One Notice of Funding Availability information collection requirements. The following concerns and recommendations are suggested in the process of preparing for Round Two of BTOP.

1. Application Content, Fields, and Requirements
    A. Focus of Application
      - The American Library Association (ALA) believed the focus of the application places an unfair burden on anchor institutions since they are forced to tailor applications to categories (e.g., residential services, commercial broadband offerings) that may not accurately depict their projects.
      - The Independent Telephone and Telecommunications Alliance (ITTA) was concerned that the application and review focus would be on an entire proposed funded service area and would be problematic if a "defect" Census block was identified ("infection rule").
    Recommendations:
      - Develop separate section or application for anchor institutions.
      - Provide additional guidance on how anchor institutions should apply for BTOP (e.g., Middle vs. Last Mile Infrastructure).
      - Provide guidance and allowance for applicants to be permitted to sever a project from an application proposing to serve multiple areas to avoid "infection" disqualification.

    B. Ease of Use and User Interface
      - The ALA commented on the difficulty of completing sections because of page limitations and attachment restrictions.
      - The ALA further noted that application completion was difficult due to the lack of instruction on how to fill out certain forms (e.g., lobbying disclosure).
      - The Schools, Health and Libraries Broadband Coalition (SHLBC) commented that the current application proved confusing because of ambiguity on key terms and forms.
      - The ALA noted confusion regarding the initial screen to access the application, specifically it lacked buttons such as "work on your application," "middle mile," or " non infrastructure" to guide the applicant during the application process.
    Recommendations:
      - Remove limits on number of pages allowed for supporting documents (mapping/financial attachments).
      - Provide directions or links to resources on how to successfully complete required documentation or forms.
      - Improve directions for completing each section by clarifying terms used in the application.

- Include more informative buttons and explanations to assist applicants during the application process.

C. Required Application Elements
- The ITTA was concerned with burdens involved with the application requirement to provide financial data (i.e., pro formas) for the entire applicant entity, not just the proposed project operations. The SHLBC echoed this concern, in terms of state or local agency budget projections. Further, ITTA asserted that these required financial projections could be misconstrued by the financial and investment community.
- The ALA was concerned that the application asked for more information than required for the initial application review process (e.g., legal opinion, lobbying disclosure).
- The SHLBC commented that the documentation required to demonstrate a proposed funded service area's unserved or underserved characteristics was too burdensome and that the information was not easily obtainable.

Recommendations:
- Require only pro-forma financial information for proposed project operations, not entire organizations of applicants.
- Discern what information is needed from applicants for effective evaluation in the initial portions of the review process and allow applicants to provide the additional detail and administrative forms in the later portion of the review process.
- Evaluate other mechanisms by which applications can demonstrate unserved or underserved characteristics of proposed funded service areas that are less burdensome or based on publicly available data.

D. Online v. Paper Application
- The ALA noted discrepancies between the paper and online applications.
- The SHLBC commented that the online application required more information than what was specified in the NOFA and the Application Guidelines.

Recommendations:
- Review both paper and electronic applications for consistency in numbering and content.
- Ensure that both applications ask for the same attachments.
- Crosswalk NOFA, Application Guidelines, and applications to ensure consistency among directions and requirements.

2. EasyGrants and other Technical Issues
A. Mapping Tool
- The SHLBC and ITTA felt the service area mapping process in the application was extremely tedious and burdensome.

Recommendations:
- Work with RUS to identify how the mapping tool can better meet application needs and applicant experience.
- Consider the use of publicly available maps (i.e., maps for counties, cities, states, census-designated communities, census blocks and GIS shapefiles) into the online application system to provide a more user friendly alternative.

B. Uploading Attachments

- The SHLBC stated that several of their applicants had to work in the middle of the night and early hours to upload documents in the system because of the variety of form entry and quality control criteria.
- The ALA reported on how an uploaded file would appear as "file being converted," but the file was never converted in EasyGrants because the number of pages of the upload exceeded the maximum number allowed.

Recommendations:
- Address mandatory application elements, attachments, and documentation required for Step One of the review process.
- Decrease the number of attachments required via the online application system by adding text fields to capture data previously required in attachments.
- Add a clearly stated "page number limit" information for uploads in the application system.
- Conduct a thorough evaluation of the application system, especially the upload of attachments, to improve its usability.

C. Browser Issues
- Both the ALA and SHLBC commented on browser rendering issues with EasyGrants (using the IE web browser leading to incomplete downloads).
- All applicants were not aware of the increased ease of use with the Mozilla Firefox browser during the August 20, 2009 application process, although the information was posted on broadbandusa.gov.

Recommendations:
- Perform a thorough evaluation of the application system using "Internet Explorer" and "Mozilla Firefox."
- Use additional communication tools to relay solutions of technical issues during the application process (i.e., NTIA voicemail message, emails, etc.).

D. Text Input into EasyGrants
- The SHLBC noted that applicants consistently found the online system would use fewer character counts (including spaces) than Microsoft Word.
- The ALA noted the character limits for answers in the online application differed than the announced page limits for paper applications.
- The ALA and SHLBC commented on the burden if inputting multiple instances of records in EasyGrants (e.g., PCC applications, middle mile service data).
- The ALA felt that the amount of text space allowed was insufficient for detailing complex projects.

Recommendations
- Conduct a thorough evaluation of the character count of the online application system.
- Ensure consistency between the number of characters permitted in an answer and the announced number of page limits in the paper application.
- Review instances in which multiple record input is required and alternative means of input (e.g., upload of Excel spreadsheet or CSV to automatically populate EasyGrant text fields).
- Consider increasing text field allowances to allow for additional applicant input

E. Slow Response Time
- ALA applicants reported very slow response times while attempting to input data.
- The ALA commented how applicants could only get reports to run properly by requesting them at 4:00 or 5:00 a.m.

Recommendations
- Require more of the work to be completed offline prior to final submission.
- Develop a mechanism (e.g., email) to inform applicants that their uploads and conversions are complete.

3. Confidentiality
   A. Confidentiality
   - The ITTA noted that the application did not properly articulate what elements of an application would be publicly available for the Public Notice process and for State consultation and consideration.

   Recommendations:
   - Clearly articulate on the BTOP application website what information will be publicly available and submitted to entities such as the States.
   - Outline precise measures to ensure the protection of confidential information.
   - Make applicants check a box acknowledging that the information they provide in each section will be kept confidential or be publicly available.

4. Time to Complete
   A. Insufficient Time
   Concerns:
   - The SHLBC, ALA, and ITTA expressed concerns with the short application timeframe and that the application process was complex and data information requirements were burdensome given the time allotted for completion.

   Recommendations:
   - Increase the application window to provide applicants sufficient time to complete the application and provide all necessary data requirements.
   - Conduct a thorough evaluation of the application system to avoid any technical difficulties during the application process time window.

Summary of Application Issues

Application Issues	EasyGrants	Application Guidance	Application Content	RUS Coordination Issue
Focus of Application		x	x	x
Ease of Use and User Interface	x	x	x	
Required Application Elements			x	x
Online v. Paper Application	x	x	x	
Mapping Tool	x			x

Uploading Attachments	**x**		**x**	
Browser Issues	**x**	**x**		
Text Input into EasyGrants	**x**			
Slow Response Time	**x**			
Confidentiality		**x**	**x**	
Time to Complete	**x**	**x**		