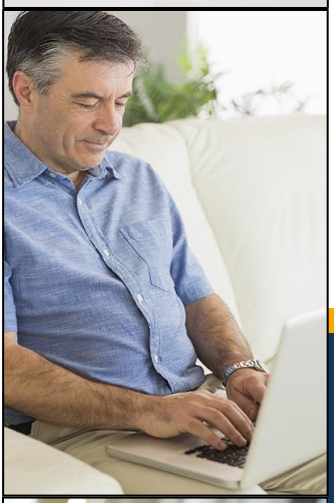
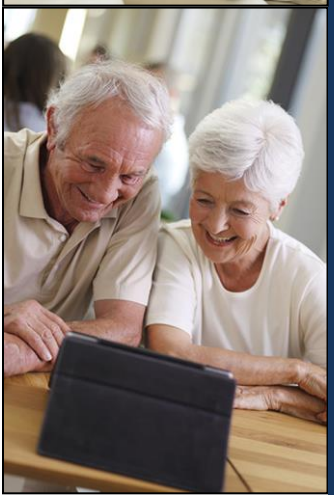




NEW YORK STATE OF OPPORTUNITY | Broadband Program Office

REQUEST FOR INFORMATION

New NY Broadband Program

New York State Urban Development Corporation d/b/a/
Empire State Development
New York State Broadband Program Office
625 Broadway, 8th Floor
Albany, NY 12245
(866) 322-5787

Date of Release: September 8, 2015

The Broadband Program Office (the "NYS BPO" or "BPO") of the New York State Urban Development Corporation d/b/a/ Empire State Development ("ESD") hereby issues this Request for Information ("RFI") to seek input from qualified parties to inform the preparation of guidelines for and structure of the New NY Broadband Program.

Note: This <u>IS NOT</u> a Request for Proposals ("RFP").

I. Introduction

ESD issues this RFI for the purpose of preparing guidelines for the New NY Broadband Program (alternatively, "the Program"), the purpose of which is to **support the development of infrastructure to bring high-speed Internet access to underserved and unserved regions throughout the State.** We seek information from entities that may ultimately apply for funding as part of the Program, from public and private entities that may be interested in contributing assets or providing support for the Program in other ways (as discussed further in *Section V--Information Requested*, below), from public interest and consumer representatives, from other interested parties, and from the public.

The New NY Broadband Program, under the aegis of the NYS BPO, is in the process of developing and finalizing implementation plans for the Program. Given the Program's scale, proposed timeline, and goals (*see Sections III--Overview and IV--Background*, below), ESD would like to offer interested parties and stakeholders an opportunity to provide information for consideration by the BPO ahead of determining the Program's structure.

ESD's goals in issuing this RFI are to:

- Identify strategies for structuring and/or implementing the Program, and to stimulate interest in providing broadband access to all underserved and unserved areas of the State.
- Identify ideas and/or recommendations on how to speed deployment of broadband infrastructure to meet New York State broadband goals and the proposed timeline.
- Identify suggestions on how the State can leverage partnerships, utilize existing assets, coordinate broadband deployment with other infrastructure improvements, and/or take other steps to reduce broadband deployment costs.
- Identify potential challenges and/or roadblocks related to the expansion of broadband access for underserved and unserved areas of New York State.
- Obtain information on potential technology solutions that might enable broadband access for underserved and unserved areas of New York State.
- Identify regional considerations that might be relevant to the Program's ability to meet its goals.
- Identify barriers that may prevent residents and/or businesses from taking advantage of the benefits of broadband service, including approaches to ensure all New Yorkers have access to broadband at reasonable costs.

ESD welcomes responses to this RFI and seeks creative solutions that will maximize investment

while providing reliable, high-quality broadband services. ESD plans to issue a Program-related RFP or other competitive solicitation by early 2016 and, in doing so, may use information obtained from responses to this RFI, or otherwise obtained. Responding to this RFI will not provide any advantage with respect to any such subsequent competitive solicitation, nor will failure to respond to this RFI prejudice any respondent to the solicitation. ESD reserves the right to withdraw this RFI or any subsequent RFP, or to decline to award any Program-related contract.

II. RFI Process

A. RFI Contact Information

RFI Responses should be submitted through our online web portal, available at http://www.nysbroadband.ny.gov/new-ny-rfi. If respondents cannot submit online, RFI responses may be emailed to NYSBroadband@esd.ny.gov or mailed to the following address:

Angela Liotta, Deputy Director
NYS Broadband Program Office
625 Broadway, 8th Floor
Albany, NY 12245
NYSBroadband@esd.ny.gov

Questions concerning the RFI may be emailed or mailed to the contact noted above.

The subject line of any email or correspondence concerning this RFI must clearly note the RFI and indicate the nature of the submissions (*e.g.*, "New NY Broadband Program RFI – Response" or "New NY Broadband Program RFI – Questions").

B. Guidance for Respondents

ESD may use information obtained from responses to this RFI in its implementation of the New NY Broadband Program.

Neither ESD, through the BPO or otherwise, nor the State of New York, will be liable for any costs incurred by any respondent pertaining to the preparation and submittal of any written responses, or for participation in a demonstration in response, to this RFI. Any content that is proprietary and/or confidential must be clearly marked as such in the response. Failure to mark content as proprietary and/or confidential may result in its disclosure in the event a response is the subject of a Freedom of Information request under Public Officers Law Section 87. In any event, ESD will determine, in its sole discretion, appropriate disclosure in response to any Freedom of Information Law request. All materials submitted by a respondent shall become the property of ESD and may or may not be returned to the respondent, at the sole discretion of ESD.

ESD may issue announcements amending this RFI in response to questions. Any revisions to the RFI will also be posted at the following location: http://www.nysbroadband.ny.gov/new-ny-rfi.

ESD may communicate with any and all third-parties, on the subject of this RFI or otherwise, during the pendency of this RFI and/or following the receipt and consideration of RFI responses. This may be through email exchanges, phone discussions, meetings, demonstrations, and/or correspondence, and may be with an individual respondent, a subset of respondents, or all respondents. As RFI responses are reviewed, ESD reserves the right to send follow-up clarification questions to respondents of further interest, or, at ESD's discretion, to invite any respondents to make demonstrations at the NYS BPO's main office – located at 625 Broadway, 8th Floor, Albany, NY 12245.

C. RFI Schedule

Key Event	**Date**
Release of RFI	9/8/2015
Written RFI Response due date	10/23/2015

1. RFI Questions and Answers

Respondents are encouraged to submit questions for clarification of any statements/questions, or for any other reason concerning this RFI. Questions regarding this RFI can be submitted via email to NYSBroadband@esd.ny.gov.

At its discretion, ESD may contact respondents who submit questions for clarification before issuing a response. ESD is under no obligation to respond to questions. ESD reserves the right to amend the RFI response submission schedule, depending upon the extent of the questions received.

2. RFI Responses

RFI Responses are due on or before **October 23, 2015 at 4:30 p.m. EST.**

III. Overview

Governor Cuomo has launched the largest and most ambitious investment in statewide broadband deployment in the country. Through the creation of the $500 million New NY Broadband Program, the State of New York will incentivize broadband providers to expand and upgrade networks to ensure that they reach all underserved and unserved communities in the State. The Program is designed to ensure that every New Yorker has access to high-speed Internet. The Program will be implemented by the end of 2018.[1]

Important elements of the Program include:

- Access to broadband at speeds of at least 100 Mbps (download) in most places, and 25 Mbps (download) in the most remote underserved and unserved parts of the State.

[1] Program goals are defined to meet the highest level of service, while being consistent with the cost-effective use of available public funds.

- Public/private sector partnerships and a required private sector co-investment.
- Regional, ground-up deployment planning with the help of New York State's ten (10) Regional Economic Development Councils ("REDCs").
- Leveraging of State-owned fiber and other assets.
- The ability to bring high-speed Internet access to unserved areas of the State, public libraries, and educational opportunity centers.
- Promoting affordable broadband access to both commercial and residential users.

IV. Background

A. New York State Broadband Program Office (NYS BPO)

A division of ESD, the NYS BPO serves as the State's single point of contact for broadband issues. The NYS BPO's mission is to increase economic and social opportunities through broadband deployment. The NYS BPO serves a variety of functions, including:

- Support of broadband initiatives for New York State's ten (10) REDCs, to advance broadband access and adoption;
- Coordination of broadband projects across New York State and collaboration with broadband project sponsors to maximize broadband investments in the State;
- Management of State broadband grant programs, including Connect NY Broadband Grant Program ("Connect NY") and the New NY Broadband Program; and
- Engagement in State, multi-state, federal and international partnerships on broadband-related issues, including broadband deployment, digital literacy, and the National Broadband Plan.

B. Broadband Access in New York State

The State of New York's broadband landscape has seen substantial improvements over the past four years, rising from access rates of 65% in 2010 to 95% in July 2014, when measured at speeds of 6 Mbps download and 1.5 Mbps upload. While New York State is making gains in broadband penetration, many households are still not full participants in the information age because broadband access is not available where they live. For example:

- As of July 2014, approximately 500,000 households lacked access to broadband at speeds of at least 25 Mbps download – *the minimum speed goal defined as part of the New NY Broadband Program.*
- New York State's rural North Country (comprised of Franklin, Clinton, St. Lawrence, Essex, Jefferson, Hamilton and Lewis counties) contains the largest percentage of homes

without access to broadband service at these same speeds. Approximately 50,000 households are unserved in the North Country, 10% of the total statewide.

- Approximately 3 million households and 113,000 businesses cannot get access to broadband at speeds of 100 Mbps download. And 70 percent of upstate New Yorkers cannot access broadband at 100 Mbps download, including 32 counties with no access at all to broadband at that speed.[2]

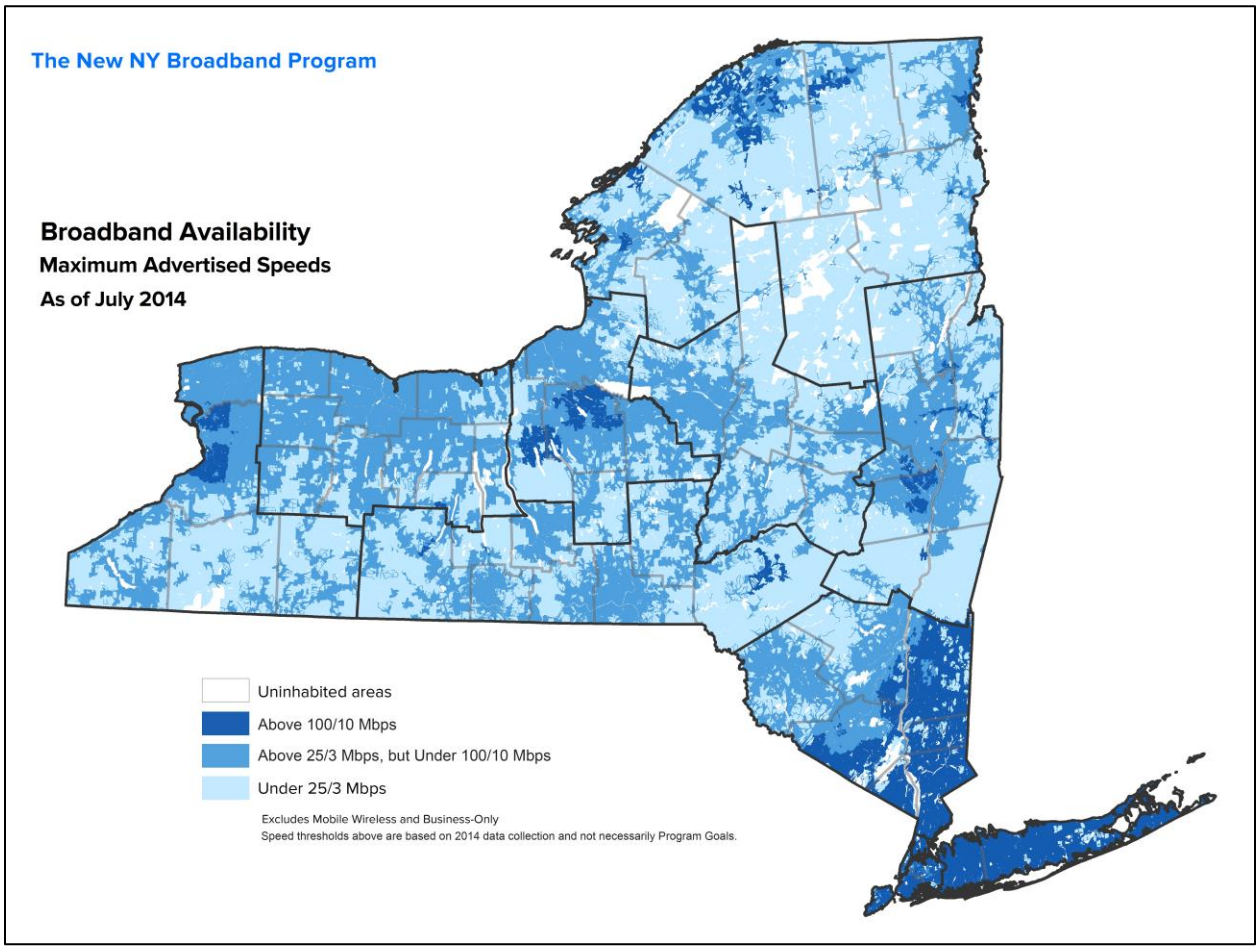
Many of these coverage gaps exist due to the challenge of deploying broadband to New York State's rural communities. It can be challenging for broadband providers to expand or upgrade their networks in rural New York due to the high costs associated with last-mile access – the cost to deploy broadband from the middle mile, or access point, directly to the customer's home or business. Furthermore, New York's diverse geography plays a predominant role in determining whether broadband infrastructure can be cost-effectively deployed and maintained. Many of the rural areas of New York State are characterized by mountains, lakes, rivers and parks, where the deployment of broadband services to households and businesses can be difficult. The Program will address these challenges, amongst others.

[2] NYS Broadband Mapping Data, July 2014

C. Underserved and Unserved Areas of New York State

New York State's broadband mapping initiative has enabled the State to understand the existing broadband availability landscape; by identifying underserved and unserved areas of the State, the mapping initiative has identified the broadband availability gaps that must be closed to ensure all communities are connected at minimum speeds defined by the New NY Broadband Program.

The map below shows current broadband availability by speed tier.



V. Information Requested

The NYS BPO welcomes ideas and recommendations from all interested or potentially interested parties and stakeholders. Respondents are not required to submit responses pertaining to every question, but ESD encourages interested parties to respond to any and all relevant aspects of this RFI. Providing a response to any or all of the questions is not mandatory, nor a condition of qualification for this RFI or any potential future RFP, should one be issued. The information provided will not have any impact on ESD's evaluation of a respondent's submission in response to a future RFP, should one be issued.

While some of these questions are specifically directed to broadband service providers, you

should feel free to answer any other questions in your capacity as an interested party and based on your knowledge.

A. General

1. Provide a brief overview of your organization.
    a. Please identify yourself and any organization you represent in this RFI.
        i. Name of respondent
        ii. Organization and affiliation
        iii. Address (organizational, if responding on behalf of an entity)
        iv. Contact information (phone number(s) and email address)
    b. Indicate in what capacity you are responding:
        i. Broadband service provider (last-mile)
        ii. Broadband service provider (middle-mile)
        iii. Municipality
        iv. Broadband consumer
        v. Other interested party (please describe)
2. Please identify any New York State counties and/or regions that you represent (if a municipality or a broadband consumer) or in which you conduct business (if a broadband service provider).
3. *If you are a broadband provider*, please describe your experience, capabilities, and qualifications in the broadband sector, including other networks your organization has designed, built, maintained, or operated.
4. *If you are a broadband provider*, please describe the assets and capabilities that might lead you to participate in the expansion of broadband access in New York State, including, but not limited to, fiber, conduits, towers, poles and other physical infrastructure.

B. Program Structure

1. Overall Program Strategies

a. *If you are currently a broadband provider*, do you presently contemplate participating in the New NY Broadband Program?

   i. If yes, please describe in what capacity you would participate (*e.g.*, as a last mile provider, middle mile provider)

   ii. If not, how might ESD encourage you to participate in the Program?

b. *If you are not currently a broadband provider*:

   i. If applicable, do you presently contemplate participating in the New NY Broadband Program? Please describe in what capacity you would participate.

   ii. How might ESD best encourage a high level of participation in the Program?

c. The New NY Broadband Program plans to issue an RFP seeking bids from applicants to connect underserved and unserved areas. It is expected that applicants would be scored subject to specific criteria including, but not limited to, the amount each applicant seeks as a financial match, proposed technology utilized, speed deployed, cost per additional home served, management capabilities, corporate financial viability, plans related to upstate rates of affordability and other community benefits, such as additional businesses or community institutions served, amongst others. Please comment on the above approach, and on those criteria and/or any others that should be used for scoring.

d. As an alternative or complement to the method of project scoring described in Question c above, the BPO is also considering utilizing a "reverse-auction", in which each project would be awarded to qualifying bidders based on the lowest-cost per additional home connected. Please comment on this approach.

e. Further to Question d above,

   i. The Program is considering establishing "ceiling bid" prices for each additional home or region to be served (*i.e.*, maximum permissible bids). By requiring bidders to adhere to a ceiling bid price, the Program would screen out noncompetitive bidders and minimize the risk of excessive project costs relative to the size of the Program. Please comment on this approach and on any factors that the Program should consider in setting ceiling bid prices.

   ii. In order to avoid an excessive number of grants, which could impose an undue administrative burden, and to ensure that underserved and unserved communities are covered in their entirety, the BPO plans to require that each bidder be required to cover a minimum territory, such as a census block, municipality, county, or

franchise area. Please comment on such a requirement and the minimum geographic area that should be covered by each bid.

f. Recent state and federal broadband grant programs have been opened for eligibility to a wide range of potential applicants, including not only traditional communications providers, but also local governments, non-profits, consortia, and other non-traditional broadband providers who are interested in meeting broadband needs.

   i. In order to address the broadband needs of the higher cost, lower return areas of the State, and to stimulate competition and innovation in the preparation of applications under this Program, the Program plans to open bidding to entities such as those described in Question f above. Please comment.

   ii. Incumbent broadband providers may have an advantage in developing competitive bids due to their embedded infrastructure and resulting lower costs. What measures could or should the Program institute in order to promote maximum competition amongst all bidders?

g. Do you have comments and/or recommendations relative to the Program's goals, as described in *Section III--Overview*? If so, please elaborate.

h. The Program has publicly articulated download speed goals; what objectives relating to upload speed goals should the Program adopt? Please explain your rationale.

i. The legislation authorizing funding for the New NY Broadband Program states that priority shall be given to projects that bring high-speed Internet access to unserved areas of the state, public libraries, and educational opportunity centers. Please comment on how the Program could be structured to provide access to the designated entities in the most cost-effective manner to the State.

j. Do you have any other general comments and/or recommendations relating to how ESD might structure the Program to best achieve its goals? If so, please elaborate.

2. Timeline

The New NY Broadband Program is designed such that the Program will be implemented by the end of 2018.

a. Please provide comments relative to the intended timeline for meeting the Program's goals, along with key milestones. What steps should ESD take to enable participating providers to meet that timeline?

b. Explain how you would prioritize which areas should be constructed first, and why.

c. *If you are a broadband provider*, please identify any and all areas of the State in which you are interested in expanding and/or upgrading service under the Program. Please

describe your contemplated plan for expanding and/or upgrading service with respect to each identified area.

d. Please describe any specific geographic considerations and/or barriers that you believe might impair the Program's success in meeting its goals in your region of the State (*e.g.*, New York City, the Adirondacks, Western New York), and your proposed solutions for addressing those regional considerations/barriers.

    i. Some stakeholders have commented that construction in the North Country, including Adirondack Park, is challenging due to zoning and other legal or regulatory requirements. What technological solutions and/or other creative approaches would be most effective for that region?

e. Some stakeholders have commented that construction has been delayed or impacted due to "make ready" issues, pole attachment complications, and other core infrastructure issues, such as access to rights-of-way and trenching. Please share your concerns about any such issues that could delay or adversely impact network construction. If, as a provider, you have encountered delays in this area, please detail your experience and how you addressed these challenges. What approaches would be most useful to minimize these concerns?

f. Are there any regulatory requirements that you believe would pose challenges for achieving the goals of the Program? If, as a provider, you have encountered regulations – at the federal, state, or local level – that slow down, or increase the cost of, broadband deployment, please describe your experience. Are there any specific government requirements or processes that would cause you to decline to participate in the Program? Please comment with the greatest specificity possible.

g. Please provide any other comments and/or recommendations relative to the Program's timeline for achieving its goals.

3. Matching Funds and Reimbursement Process

The New NY Broadband Program has allocated $500 million to incentivize the private sector to expand high-speed broadband access in underserved and unserved areas. The Program will require that participating Broadband providers provide a significant match of the capital needed to meet the Program's goals.

a. The Program has set forth an initial target co-investment/match funding of 50% of total project costs, but to be determined by comparing bids to assure that the funds drive the maximum amount of new statewide broadband availability. The match for each individual project is expected to vary based on a number of factors. Please comment on any considerations relative to the amount and proposed form or structure of such match funding.

b. How should the Program take into account other available funding streams (*e.g.*, FCC CAF II, FCC E-Rate, and other federal and state funding)?

c. Assuming that Program funding will be issued in the form of grants to reimburse project costs, please comment on the work-flow approach for reimbursement that would be most effective in order for providers to meet the Program's contemplated timeline, while also meeting State goals to safeguard public capital and ensure prudent funding of opportunities. If applicable, when recommending such approaches, please feel free to discuss other state or federal programs in which you may have participated or with which you may be familiar, as well as suggested modifications to their reimbursement approaches.

d. Some providers have expressed an interest in receiving capital in forms other than grants, particularly if those may accelerate the build-out process. Please provide your thoughts on potential models for ESD's funding of partners in the Program, including, but not limited to, loans and/or loan guarantees, tax incentives, direct investment, and/or any other models.

e. *If you are a broadband provider*, please provide information related to the determination of your target Return-on-Investment ("ROI") for broadband projects such as those contemplated herein:

   i. What is the primary financial metric by which you assess project buildout acceptability (*e.g.*, IRR, payback period)?

   ii. What return threshold would you be seeking in connection with this project, and over what time frame would you be seeking that return threshold to be achieved?

   iii. What assumptions would you make with regard to adoption ("take-rates") in currently underserved or unserved markets where you may begin to provide service? What is your experience with regard to adoption rates in previously unserved areas?

   iv. What would be the sources of capital in funding the contemplated projects, other than NYS grants (*e.g.*, debt, equity)? What is the assumed weighted average cost of capital that you would use in your calculations for identifying the cost of debt, cost of equity, and the assumed debt/capital ratio?

C. Pricing and Affordability

1. Please comment on how the State should define "affordable" access to broadband service. What elements of an affordability program (*e.g.*, service price, speed, device subsidy, content) do you believe are most critical to address affordability issues?

2. Should recipients of funding from the New NY Broadband Program be required to institute pricing requirements for consumers, businesses and/or anchor institutions (*e.g.*, schools, libraries, hospitals)?

3. One approach that has been proposed is that companies receiving grants should be required to price their services in line with, or at a modest discount/premium to, the average of comparable offerings by comparable providers in comparable areas of New York State, or, alternatively, the average of comparable offerings in metropolitan areas of New York State. Please comment on this approach.

4. What other approaches do you believe could be successful in enabling all New Yorkers to access broadband at affordable costs?

5. It has been suggested that the Program could require, or incorporate scoring criteria encouraging, participants to offer some form of direct-assistance to low-income neighborhoods or households, such as discounted broadband subscriptions, technologies, or the wiring of community "learning centers." Please comment.

6. *If you are a broadband provider* that contemplates selling end-user broadband service in partnership with the Program, what additional benefits, if any, would you consider offering served communities (*e.g.*, free community WiFi in public spaces, digital learning services)?

D. Technologies

1. General Considerations

a. The New NY Broadband Program currently plans to be technology-agnostic, provided that the technologies are established in the marketplace, meet the Governor's speed goals, and contain a path to increasing speeds over time. Are there technologies that should be favored, or some that should be disallowed, in your view?

b. In urban and suburban settings, the Program anticipates that fiber-based and cable modem solutions are likely to be more prevalent due to inherent technology advantages. In rural settings, the Program anticipates that providers will offer a variety of potential solutions, including the foregoing, as well as fixed wireless. Should one or more of these technologies be preferred in any away over others? Are there other technologies that should be considered? Please explain.

c. The Program expects that funding for projects offering 25 Mbps service will give priority to technologies that are scalable to higher speeds. Please comment.

d. A number of constituents and consumer advocates have suggested that speeds below 25 Mbps should be permitted in certain rural locations where the cost to provide service may otherwise be prohibitively expensive. Please comment.

e. What consumer and commercial applications of broadband do you anticipate will drive the need for increased speeds over the next five years? In five years, what download and upload speeds do you anticipate will be required by consumers? By businesses? Please explain your rationale.

f. Please provide any other comments and/or recommendations relative to the technology to be used by participants in the Program.

2. Infrastructure and Network Access

a. Do you believe that there are adequate middle mile broadband facilities in New York State to serve the needs of the last mile network providers going forward? If not, please describe current gaps in State's middle mile infrastructure and suggest strategies for efficiently addressing such gaps.

b. If you are a service provider who is contemplating seeking funds under this Program, are there particular middle mile-specific or backhaul gaps that the State should address to enable your potential project?

c. Certain market participants have suggested that, in order to strengthen New York State's broadband infrastructure, a portion of the Program amount should be set aside to fund one or more open-access middle mile networks, where gaps may exist within the State. Please comment on the potential benefits and considerations of such an approach, and where such gaps exist in New York State.

d. Another suggested approach is to build a statewide open-access middle mile network, which would enable heightened competition, innovation and affordability in communities. Please comment on this model.

3. Wireless Technology Solutions

Please respond as a wireless provider, or, as another interested party, from your point of view.

a. The New NY Broadband Program anticipates that many broadband providers in sparsely-populated areas will propose fixed wireless solutions. What wireless technologies do you believe will be most effective in meeting the Program's goals of coverage, cost and speeds?

b. What types of wireless technology are scalable --

    a. From 25 Mbps (download) to 100 Mbps (download)

    b. To speeds greater than 100 Mbps (download)

c. Please comment on the download and upload speeds that a fixed wireless service offering can currently provide. Also, please comment on the anticipated upgrade migration path contemplated by 2018 of such technology (and any related cost thereof).

d. Please comment on the benefits and drawbacks of fixed wireless as compared to other available broadband technologies.

e. Please discuss the deployment cost associated with a fixed wireless business model, including equipment cost, backhaul, service radius and other factors.

f. Please discuss your views of emerging "white space" wireless technologies, unlicensed LTE, and satellite-based solutions.

g. Please comment on the availability of spectrum, in currently underserved and unserved areas for the solutions contemplated, and on how the availability of spectrum may evolve as demand for broadband service increases.

h. Please identify and comment on any other potential barriers to effective deployment of wireless solutions (*e.g.*, access to poles, line of sight issues), and suggest strategies for addressing them.

i. Please comment on potential barriers to wireless technology from a user perspective that could limit the Program's adoption goals (*e.g.*, data caps, latency).

4. Additional Questions for Broadband Providers

a. What technology would you use to meet the Program's goals? Please provide your rationale for using that technology.

b. What broadband speeds can your technology deliver? Please note any of the following that apply. If not dedicated speeds, please include relevant details regarding practical subscribed service rates that could be offered.

   i. Less than 25 Mbps / 3 Mbps (download/upload) only

   ii. 25 Mbps / 3 Mbps (download/upload)

   iii. Between 25 Mbps / 3 Mbps (download/upload) and 100 Mbps (download)

   iv. 100 Mbps (download) or greater

c. *For wireless broadband providers only*, does your technology support symmetrical speeds (*i.e.*, same download and upload speeds)? If not, what upload speed is your technology capable of achieving?

d. What download and upload speeds does your organization plan to make available within the next five years?

E. Partnerships and Regional Participation

1. REDCs and Existing Assets

As part of the New NY Broadband Program, each REDC will provide input and support toward meeting the goal of serving all currently underserved and unserved areas of New York State by confirming the location of underserved or unserved areas; providing their views of the most cost-effective means to provide access to those areas; assisting in the creation of partnerships that may meet these needs; and in identifying and leveraging relevant State or municipal-owned assets where possible.

a. As discussed above, existing State and municipal assets that the Program may leverage for the benefit of the New NY Broadband Program include fiber, utility poles, and rights-of-way. What other assets can the Program leverage for the benefit of the providers?

b. Are there steps the Program, or the REDCs/municipalities, can take to leverage these assets more effectively?

c. Is there additional support or input from the REDCs that would be helpful for the Program? If so, please comment.

d. What other existing programs (*e.g.*, E-Rate, Smart Schools) should the Program leverage and/or coordinate with closely?

2. Other Partnerships

a. What partnerships will be necessary to enable the New NY Broadband Program to achieve its goals?

b. *If you are a broadband provider*, please answer the following questions:

   i. Are there strategic partners whose cooperation would enhance your ability to deliver services under the Program and/or reduce your time and cost to deploy? If so, please list the strategic partners you are currently working with and/or plan to partner with in the future.

   ii. Would you be willing to partner with other broadband providers and/or municipalities to provide broadband access to underserved and unserved areas of New York State? If so, please explain under what circumstances you would be willing to enter such partnerships.

   iii. Are you willing to connect to open-access fiber networks? Or to open your fiber networks or lease fiber or communications services to partners?

   iv. Are there types of interconnection arrangements that would foster innovative models to reach underserved and unserved areas?

c. What other steps do you believe the State of New York can take to encourage or facilitate partnerships?

d. Please provide any other comments and/or recommendations relevant to the Program.

Thank you for your participation in this RFI.