



April 1, 2025

Submitted via e-mail to: Committee clerks.

To the Honorable Senate Committee on Commerce and House Committee on Corporations:

We appreciate the opportunity to offer comments in support of S 377 and H 5817 (The Rhode Island Broadband Mapping Program).

I. Rhode Island consumers deserve transparency to be able to make informed choices.

Without robust upload speeds and reliable connectivity, it continues a daily struggle for many Rhode Islanders to participate in distance learning, work from anywhere, utilize telemedicine, and fully engage in our democracy.

This legislation would ensure the continued accuracy of ConnectRI's highly useful [Rhode Island Broadband Map](#) and proposes to add features such as listing the actual level of service offered and network operational availability provided at all Rhode Island Broadband Serviceable Locations (BSLs). Consumers deserve to know the type of broadband service available, service packages offered, and expected network performance offered at their address.

II. Network operators already track provisioned service levels and operational availability.

Industry standard network management, monitoring, and orchestration platforms automatically aggregate all network attributes, which can be viewed and shared in real-time. Internet service providers (ISPs) use these tools to monitor the health of the overall network, the connectivity status of individual consumer endpoint devices, and deploy software updates to network devices.

These technological solutions provide data exchange functionality through Application Programming Interfaces (APIs) along with the ability to export datasets to lightweight data-interchange formats such as JavaScript Object Notation (JSON). These features allow operators to provide overall and granular network reliability metrics, distinguishing between routine planned maintenance (such as security patches and component upgrades) and unexpected service interruptions and outages.

III. Bolstering the business case that further strategic investments and additional marketplace competition is sorely needed in Rhode Island.

Despite continued concerns raised by Rhode Island residents to their elected representatives, the “presumption of robust connectivity” narrative by incumbents continues despite there being just one provider of fixed broadband in large swaths of Rhode Island, with predictable results – exorbitant pricing, numerous network slowdowns, and intermittent outages.

Perhaps the true reason incumbents vociferously oppose robust broadband mapping efforts is because transparency and accessibility of wired and wireless network performance levels would



identify potential market opportunities where the incumbents are not providing service at the standard found elsewhere in the nation.¹

This proposed legislation could not be timelier, as it has become increasingly questionable whether Rhode Island will receive its full allocation of \$108.7 million from the National Telecommunications and Information Administration (NTIA) to implement the Broadband Equity, Access, and Deployment (BEAD) program, to follow the initial COVID-19 era federal funding for broadband investment through the U.S. Treasury Capital Projects Fund (CPF), which did not award funding for the underserved communities of Middletown and Little Compton. The *CoxCom LLC v. R.I. Commerce Corporation* lawsuit delayed the implementation of the BEAD program in Rhode Island, conveniently stretching out the ConnectRI program timeline to allow the administrative changes in Washington, D.C. to take effect.²

With recent statements by newly installed high-level federal officials, it is apparent that Starlink will be deemed eligible and perhaps take a significant allocation of BEAD dollars, despite indisputable laws of physics demonstrating that low Earth orbit (LEO) satellites is not a reasonable mass-market solution, with numerous questions about system capacity and ability to perform in varying conditions.³ These developments are to the detriment of Rhode Island's businesses and residents, potentially for decades to come, as only future-proof fiber-to-the-premises (FTTP) connectivity can provide an infinitely upgradable solution to meet the exponentially increasing connectivity demands to compete and thrive in a 21st century economy.

IV. Conclusion

Rhode Island businesses and residents look to the State of Rhode Island to continue its work to ensure that all BSUs in our state can fully participate in the success stories seen across America for improved broadband resiliency and reliability, robust network performance, and competitive pricing, which all have one common denominator: future-proof FTTP connectivity.

For the reasons listed above, as a Rhode Island Benefit Corporation with our steadfast belief in old school Internet ideals and the Association for Computing Machinery (ACM)'s Code of Ethics and Professional Conduct⁴, we enthusiastically support S 377 and H 5817.

I am more than happy to address any questions or comments and can be reached at <pietz@aquidnecklight.org>.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "T. Pietz".

Theodore Pietz, President and CEO

¹ <https://broadbandbreakfast.com/telecom-groups-push-back-on-rhode-island-broadband-bill>

² <https://broadbandbreakfast.com/cox-sues-to-block-rhode-islands-bead-map>

³ <https://arstechnica.com/tech-policy/2025/03/starlink-benefits-as-trump-admin-rewrites-rules-for-42b-grant-program>

⁴ <https://www.acm.org/code-of-ethics>