Notes: Broadband application examples

Things USFS wants from permit-seekers

Things USFS offers to permit-seekers

Problems causing back-and-forth

[**EXAMPLE 1:** Entrust Solutions Group – on behalf of Spectrum](https://drive.google.com/file/d/11zkuZhriUb2ak0CfR1XiWAuCsCYB6Jdv/view?usp=drive_link) – “a lot of back and forth”

* [Contractor initiates contact via the broadband form on behalf of client proponent]
* July 11 – USFS asks for:
  + SF-299
  + Plan of development (POD)
  + Map(s) of proposal
  + Notes that “Acceptable formats for GIS data are: ESRI file, shapefiles, published feature layer in AGO”
* July 12 – Contractor says files are too big to deliver via email
* July 12 – USFS asks contractor to send files in multiple emails
* July 12 – Contractor offers link to OneDrive folder
* July 12 – USFS agrees to try this
* July 12 – Contractor sends link to OneDrive folder and a list of “all PIDs associated with this submission” (possibly “permit ID”, internal to the proponent’s company)
* July 15 – USFS acknowledges receipt.
* August 7 – USFS broadband PM assigned to case follows up to ask why GIS files include generic Forest Service maps, and which file represents the actual proposal.
* August 7 – Contractor says “we were asked to include the FS layers in our submittal” and re-attaches the project shape file specifically.
* August 7 – USFS project manager acknowledges receipt.
* August 8 – USFS follows up with “deficiencies in the proposal” that the contractor must address to proceed.
  + Comments on SF-299
  + Comments on POD
  + Letter of good standing (or equivalent) from TX Secretary of State
  + Certificate of Liability “must list the United States as an additional insured” – USFS says it can deal with that later.
* August 8 – USFS adds clarifying comments.
  + Only proponent can sign SF-299 #1
  + Proponent must submit documentation to establish authorized agent
* August 8 – Contractor acknowledges receipt
* August 13 – Contractor follows up with questions about USFS comments.
  + Address for listing the United States as additional insured
  + What documentation can be provided to show financial capability (#12)
  + Examples of description of alternatives considered (#13)
* August 14 – USFS responds to questions.
  + Re: United States and insurance – says US doesn’t need to be an (insurance) certificate holder,
  + Re: #12 – Suggests “including examples of how much fiber optic line the proponent has constructed … statements like this support that the entity has the capability to do what they are proposing to do”
  + Re: #13 – Says USFS can’t provide examples because other proposals are proprietary. “The intention of 13 is to understand why it was necessary to authorize an action on Federal lands, and what other options were considered.” Points to form’s instructions for #13.
  + Offers to talk through questions on a call.
* August 19 – Contractor sends:
  + Authorized Agent letter
  + Updated SF-299 – asks for review before asking for proponent to sign it
  + Clarifies who the proponent is – contractor is working on behalf of a subsidiary LLC; the name of the parent company appears in documents

[**EXAMPLE 2:** Momentum Design on behalf of Charter Communications](https://drive.google.com/file/d/1J_minMWtqpAAMPIlfIqdrkYBLEDEuURx/view?usp=sharing) (a different subsidiary of Spectrum?) – “complete enough to initiate screening by a local forest”

* Broadband PM assigned to case submits a collection of proposals to a Lands Program Manager at an individual forest
  + “All of the projects are in the same vicinity and you may consider lumping them together for environmental review and permitting.”
    - Q: How does either a proponent or USFS decide what can be grouped together and what needs a separate application?
* Broadband PM tells the proponent that she’s passed the application along to the forest for screening

[**EXAMPLE 3:** Heberly and Associates on behalf of InterBel Reconnect](https://drive.google.com/file/d/1Xdzbu9x-oeTveEnYcPdZbgELwi5L8J8T/view?usp=sharing) — “request when additional information is needed”

* Individual forest contacts broadband team for help reviewing a proposal submitted by a contractor
* Broadband team responds to contractor
  + Lists various questions/requested revisions to “add to the Plan of Development (SF-299)”
    - * Q: Sometimes SF-299 and the POD are referred to as separate things, sometimes as the same thing. Which is it?
    - 7a: Provide the area of disturbance on USFS land specifically, not overall
    - 7h: Distinguish between right of way need for construction vs. operation/maintenance
    - 7a: Specify that when cable is replaced, old cable will be removed
    - 7b: Identify all vehicles and equipment that will be on the site; identify boring site locations (“on maps and GIS data”)
    - Whether the fiberoptic line will be leased to another party
    - Whether the right of way will be staked or flagged
    - Describe clearing or grading plans; how many trees will be removed
    - Describe erosion control measures: reseeding, revegetation, stabilization, rehabilitation
    - Describe ongoing maintenance schedules, signage
    - Provide contacts for “contingency planning”
  + Asks for GIS data (“shapefiles or geodatabase”) that shows “above ground improvements (hand holes, pedestals, etc.)”, boring locations,
    - Refers contractor to Fiber Optic Cable Mapping Requirements document
  + Asks for overview map of the project “showing USFS ownership, roads and trails, and the proposed fiber optic cable, handholes, junction boxes, and other proposed improvements. Showing existing fiber optic cable or copper cable owned by InterBel is useful, if you have access to that information”
  + Asks contractor to complete an attached data sheet/Excel file (not clear what’s in this)
  + Asks contractor for Letter of Authorization from the proponent; offers use of attached form (called “Certificate of Signing Authority”)