

# Department of Commerce

Broadband Coordination Office



## ARPA Proposal – Broadband iNEI Initiative

PREPARED FOR:

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DIRECTOR

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Mr. Keith J. Gebauer  
Executive Director  
American Rescue Plan Act (ARPA) Oversight Office  
A.P. Lutali Executive Office Building  
Pago Pago, American Samoa 96799

Subject: ARPA Proposal for AS Broadband iNEI Initiative

Dear Executive Director Gebauer:

The American Samoa Department of Commerce (DOC) is pleased to submit this proposal for funding under the American Rescue Plan Act (ARPA). DOC'S DUNS number is 854993565 and our Sam.gov registration is currently active.

The COVID-19 public health emergency has underscored the importance of universally available, high-speed, reliable, and affordable broadband coverage as millions of Americans rely on internet to participate in, among critical activities, remote school, healthcare, and work. Recognizing the need for such connectivity, ARPA provides funds to make necessary investments into broadband infrastructure.

It is with this in mind that the Department of Commerce submits this proposal for consideration. Should you have any questions regarding this proposal, please let me know.

Sincerely,

A handwritten signature in black ink, appearing to read "Petti T. Matila", is written over the word "Sincerely".

Petti T. Matila  
Director of Commerce

## Overview

Since the first case of coronavirus was discovered in the United States in January 2020, the disease has infected over 45 million people and killed over 700,000 Americans<sup>1</sup>. The virus has impacted every aspect of our lives: businesses closed, jobs were lost, government revenues plummeted, government services were impacted, travel was significantly curtailed, and the lives of our people are forever changed. Our citizens and their families have all experienced some level of change or challenge during this time. As a result of this once in a generation crisis, state and local governments across the country have been called on to respond in an unprecedented way. To support this response effort, the American Rescue Plan Act was signed into law on March 11, 2021, and with it the authorization of the Coronavirus State and Local Fiscal Funds. These funds provide the states and territories with the much-needed resources to support urgent COVID-19 relief, replace lost revenues for local governments, support economic stabilization, and to address systemic public health and economic challenges that have contributed to the inequal impact of the virus. Furthermore, while the impacts of the pandemic have been widespread, the public health and economic impacts have been most severe through low-income and disadvantaged communities. Low-income communities, people of color, and tribal communities have faced higher rates of infection, hospitalization, and death.<sup>2</sup> These communities also face pre-existing vulnerabilities that have been magnified by the pandemic, where a reduced ability to work from home and, frequently, denser housing or living situations increase the risk of infection.

In an effort to prevent the COVID-19 virus from reaching American Samoa, borders were closed in March of 2020 and remained closed until August of 2021. Locally, stringent social distancing policies were enacted as a precaution and the entire population was forced to use alternative means to ensure education, commerce, and life in general would continue. Schools, businesses, and government operations were able to accomplish this to differing degrees by utilizing broadband resources. Schools began to transition to 100% distance learning programs, businesses leveraged the internet to reach and communicate with customers, and employees across the island were introduced in large part to remote work for the first time. Each organization struggled with different challenges; however, it became very clear early on those significant improvements were needed across the entire span of the telecommunication infrastructure chain – from the internet service provider (ISP) to the end user and the devices they had available to use. Broadband speeds and quality of service rank at the top of the list when it comes to areas in need of drastic improvement. Furthermore, significant gaps became very obvious in the areas of training and technical assistance on the maintenance and use of all of the components involved with broadband utilization and adoption. To properly respond to and prepare for any future events like the one we are currently working through, the territory must pursue and implement significant improvements in all matters related to broadband utilization.

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<sup>1</sup> <https://usafacts.org/visualizations/coronavirus-covid-19-spread-map/>

<sup>2</sup> <https://www.federalregister.gov/d/2021-10283/p-22>



## Project Description

While remote work and distance learning were familiar terms prior to the onset of the COVID-19 pandemic, these modalities of work and education were considered non-essential or perhaps only complimentary or optional to the mainstream or more widely accepted methods of work and education. The same can also be said for telehealth, telemedicine, government services, and many other services delivered via broadband. The need to respond to a public health emergency via “flattening the curve” by way of short-term (or long-term in some cases) lockdowns, yet maintain continuity in commerce, education, and many other services and aspects of life, required a paradigm shift of immediate and significant proportions.

Like many communities, American Samoa had not planned for a pandemic or the impacts it would have on our community. With that being said, the local response to the health emergency did not take long to adjust and in many ways, at the center of this adjustment was broadband. Schools pivoted to remote learning quickly; employers used remote work and other tools to maintain their operations. Despite the many challenges encountered over the course of the past 18 months, our community has continued to employ incremental improvements to build resiliency in our processes to respond to COVID-19. It has also become clear that the employment of broadband and related tools – remote work, distance learning, telehealth, telemedicine, digitization of processes & services – are essential if we are to function efficiently in this ‘new normal’ we are now experiencing. The forced pivot to broadband facilitated the needed paradigm shift, allowing now for a more widely accepted use of broadband as a primary *modus operandi*.

To ensure that the territory is properly equipped to respond to COVID-19 through the use of broadband moving forward, it is necessary to facilitate much-needed improvements in our telecommunications systems and infrastructure immediately. The heavy usage and reliance on broadband can quickly strain resources, resulting in very slow speeds and poor quality of service. It is also extremely important that we address the critical issue of affordability. The territory has been fortunate thus far to not have experienced an outbreak of the virus, however, once this occurs it is likely that the territory will implement provisions of the Declaration of Ongoing Public Health Emergency & State of Emergency, which includes implementing Code Yellow or Red. These escalated conditions will implement lockdowns, forcing the restriction of movement which will require once again remote work, distance learning, and a significant reliance on broadband services.

Per the Federal Communications Commission (FCC), the official definition of broadband is a minimum download speed of 25 Mbps and an upload speed of 3 Mbps. Unfortunately, millions of Americans reside in areas where download speeds do not reach 25 Mbps or upload speeds of 3 Mbps. Despite the significant improvements made to the local telecommunications infrastructure, including the deployment of the BLAST local fiberoptic terrestrial network and the commissioning of the Hawaiki submarine cable, American Samoa still struggles to deliver on its promise of offering its residents affordable and highspeed internet service.

The following table illustrates upload and download speeds in the territory as of July 2021:

Census Tracts	Population	HH	% of HH	Ookla Median Speed Down	Ookla Median Speed Up
<b>Western District Broadband Service Area</b>					
60050951000	1722	300	0	8.39	3.21
60050951100	3624	632	0	12.98	3.26
60050951201	1968	343	0	11.63	4.74
60050951202	3839	670	0	18.39	4.58
60050951203	4898	855	0	19.76	2.91
60050951300	3653	637	0	17.83	3.16
60050951500	1232	215	0	11.66	10.52
60050951600	6177	1078	0	21.03	4.25
<b>Totals/Averages</b>	<b>27113</b>	<b>1078</b>	<b>0</b>	<b>17.01</b>	<b>4.03</b>
<b>Eastern District Broadband Service Area</b>					
60010950100	2463	430	0	13.95	2.69
60010950200	2103	367	0	7.18	3.14
60010950300	3525	615	0	16.65	3.31
60010950500	2532	442	0	11.29	2.89
60010950600	2562	447	0	16.25	4.65
60010950700	2283	398	0	17.00	7.25
60010950900	4463	779	0	23.01	4.05
<b>Totals/Averages</b>	<b>19931</b>	<b>3478</b>	<b>0</b>	<b>23.01</b>	<b>4.05</b>
<b>Manu'a Broadband Service Area</b>					
60020951800	990	173	0	No Data	No Data

Table Legend: HH=Households, % of HH=Percent of Households with Qualifying Access  
*Figure 1. Download and Upload internet speeds in American Samoa as of July 2021.*

The above data was provided by the National Telecommunications & Information Administration (NTIA) via Ookla, a widely used web service that provides internet performance metrics. In the absence of any formal broadband mapping data, this is the most current information on broadband coverage, speed, and quality available for American Samoa. As noted in Figure 1, 0% of households in all census tracts in American Samoa have access to quality internet service.

In October 2021, the NTIA entered into a Memorandum of Understanding (MOU) with ASG DOC<sup>3</sup> to collaborate and share information about broadband infrastructure and service availability and capability for the purpose of policy making and decision making at the national and territorial level related to broadband investments. ASG DOC will pursue similar agreements with local internet service providers such that our broadband maps are as current as possible, including village level and county level data if possible.

Under the final interim rule, **eligible projects are expected to be designed to deliver, upon project completion, service that reliably meets or exceeds symmetrical upload and download speeds of 100 Mbps.**<sup>4</sup> In setting these standards, Treasury identified speeds necessary to ensure that broadband infrastructure is sufficient to enable users to generally meet household needs, including the ability to support the simultaneous use of work, education, and health applications, and also sufficiently robust to meet increasing household demands for bandwidth. To achieve this, local internet service providers must continue to

<sup>3</sup> <https://www.ntia.doc.gov/blog/2021/national-broadband-availability-map-reaches-40-state-us-territory-participants>

<sup>4</sup> <https://www.federalregister.gov/d/2021-10283/p-317>



upgrade their systems and networks to make this new standard a reality for the people of American Samoa.

## Eligibility Analysis

Programs of this type are specifically authorized by the US Department of Treasury's Interim Final Rule (IFR), which identifies a non-exclusive list of eligible uses (31 CFR 35).

The statute and interim final rule outline the eligible uses of the funds so as to support the following:

- 1) To support the public health emergency or its negative economic impacts, including assistance to households, small businesses, and non [profits, or aid to impacted industries such as tourism, travel, and hospitality;
- 2) To respond to workers performing essential work during COVID-19 public health emergency by providing premium pay to eligible workers;
- 3) For the provision of government services to the extent of the reduction in revenue due to the COVID-19 public health emergency relative to revenues collected in the most recent full fiscal year prior to the emergency; and
- 4) To make necessary investments in water, sewer, or **broadband infrastructure**.

Under Section II.D.2., the interim rule provides that eligible investments in broadband are those that are designed to provide services meeting adequate speeds and are provided to underserved households and businesses. Also noted is that historically, Americans living in territories and tribal lands as well as rural areas have disproportionately lacked sufficient broadband infrastructure.<sup>5</sup>

The COVID-19 public health emergency has underscored the importance of universally available, high-speed, reliable, and affordable broadband coverage as millions of Americans rely on internet to participate in, among critical activities, remote school, healthcare, and work. Recognizing the need for such connectivity, the ARPA provides funds to make necessary investments into broadband infrastructure.

## Scope of Work

As noted in Figure 1, no households have access to quality internet service. As such, DOC will accept proposals from local internet service providers (ISPs) that support the delivery of internet service that reliably meets or exceeds symmetrical upload and download speeds of 100 Mbps, or would be expected to deliver services that are scalable to a minimum of 100 Mbps symmetrical download and upload speeds. The 100 Mbps upload and download speeds will support the increased and growing needs of households and businesses. Recognizing that, in some instances, 100 Mbps upload speed may be impracticable due to

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<sup>5</sup> See, e.g., Federal Communications Commission, Fourteenth Broadband Deployment Report, available at <https://docs.fcc.gov/public/attachments/FCC-21-18A1.pdf>.

geographical, topographical, or financial constraints, the interim final rule permits upload speeds of between at least 20 Mbps and 100 Mbps in such instances. To provide for investments that will accommodate technologies requiring symmetry in download and upload speeds, eligible projects that are not designed to deliver, upon project completion, service that reliably meets or exceeds symmetrical speeds of 100 Mbps because it would be impracticable to do so should be designed so that they can be scalable to such speeds.

DOC will prioritize support for broadband networks owned, operated by, or affiliated with local governments, non-profits, and co-operatives. DOC will also prioritize investments in fiberoptic infrastructure where feasible.

The Scope of Work for this program is outlined below:

1. DOC Broadband Office to Develop application criteria for local Internet Service Providers. Proposals should address the following:
  - a. As noted above, demonstrate how they plan to deliver internet service that reliably meets or exceeds symmetrical upload and download speeds of 100 Mbps, or would be expected to deliver services that are scalable to a minimum of 100 Mbps symmetrical download and upload speeds.
  - b. ISPs should identify in their proposals how they plan to prioritize areas that are the most underserved. DOC expects that this will be readily demonstrated as updated broadband mapping agreements and efforts are initiated with local ISPs. Prioritization may include, for example, an approach that addresses the largest population first; or a service area that has been identified to have a high percentage of households without access to the BLAST fiberoptic network; or service areas that have demonstrable higher latencies.
  - c. ISPs are encouraged to focus on projects that deliver a physical broadband connection by prioritizing projects that achieve last mile-connections
  - d. ISPs should also support the delivery of desired speeds noted above at fair and reasonable rates, comparable to average rates in any U.S. urban area.
2. DOC to conduct community engagement program to share program details
  - a. DOC to update program according to input received
3. DOC to begin accepting proposals from local ISPs for funding via the **AS Broadband iNEI Initiative**
  - a. Broadband iNEI = Broadband information Network for Expansion and Inclusion.
    - i. Broadband iNEI = Broadband Here & Now!
4. DOC to establish a panel to review proposals
  - a. Panel to include 5 people with experience in ICT, broadband, or related services
    - i. Panel to be designated by DOC Director & approved by ARPA Office Director
    - ii. Panel to utilize criteria outlined in SOW Item 1

- iii. Panel to also be briefed on IFR requirements regarding transparency and accountability in the use of ARPA funds
- 5. Proposal will be expected to include a detailed program description, work plan, budget, timeline, and expected outcomes of the project. Expected outcomes must include:
  - a. Specific targets and dates leading up to achieving a 100/100 Mbps internet service plan
  - b. Improved pricing for commercial and residential customers as a result of the program investment should be clearly stated
- 6. Proposals will be required to meet all equipment purchase requirements
- 7. Proposals will be required to adhere to applicable local licensing, certification, and permitting laws.
- 8. Successful applicants will be required to meet all compliance and reporting requirements in accordance with ARPA guidelines, objectives, and goals
  - a. Note: Training will be developed and conducted for all successful applicants prior to the commencement of programs
- 9. Sub-awardees and program recipients must provide disclosure in writing of any potential conflict of interest affecting the award pursuant to 2 C.F.R. § 200.112.
- 10. Awardee and sub-awardees must comply and follow all local procurement process and requirements in using ARPA funds in accordance to 2 C.F.R. § 200.31



## Implementation Plan & Timeline

ARPA funds are required by federal statute to be encumbered by December 31, 2024 and spent by December 31, 2026. 31 CFR 35.5. This mandate makes the need for a definite timeline for completion of projects of critical importance.

Start	End	Task
1/10/22		Program Initiation
1/10/22	1/31/22	Public Comment Period
2/1/22	2/28/22	Update Program Details
1/10/22		Begin Hiring Program Staff
3/1/22	5/30/22	Begin Accepting Proposals
6/1/22	6/30/22	Panel Review of Proposals
7/1/22	8/31/22	Award Grants
7/1/22	12/31/25	Monitor Program

## Proposed Itemized Budget

5-Year Budget	
Expense Category	
Administrative (5%)	\$500,000
Contractual (95%)	\$9,500,000
Total	\$10,000,000

The grant recipients will be required to submit as a required component of their applications a detailed budget and budget and budget narrative.

BUDGET		
Administrative	Annual	4-year total
Program Manager	\$50,000	\$200,000
Compliance Officer/Assistant	\$30,000	\$120,000
Materials & Supplies	\$20,000	\$80,000
Outreach & Training	\$100,000	\$100,000
Sub-Total		<b>\$500,000</b>
<b>Contractual</b>	Grants will vary	<b>\$9,500,000</b>
Grand Total		<b>\$10,000,000</b>

### Program Manager

The Program Manager will be responsible for the overall day-to-day management and oversight of the program.

### Compliance Officer/Assistant

The Compliance Officer/Assistance will be responsible for ensuring sub-grantees are in compliance with all rules and regulations; will also offer general support to the Program Manager with the implementation of the program.

### Materials & Supplies

This budget item will support the general administrative needs of the program; this will include but not be limited general administrative supplies, computers and/or laptops, printer, printer paper, printer ink, etc.

### Outreach & Training

This budget item will support the general program outreach goals, informing the public through available channels of the progress and benefits of the program. This may include, but not be limited to, ads, workshops, social media campaigns, or other outreach options.

## Project Lead

The project lead for this program will be Department of Commerce Director Petti Matila.

### Contact Information

Petti Matila

Director, ASG Department of Commerce

[petti.matila@doc.as](mailto:petti.matila@doc.as)

684.633.5155

## Appendix A

### COMMUNITY ENGAGEMENT

Community engagement is an essential aspect of ARPA funded projects. The intent of the US Treasury in fostering public participation is to maintain transparency and provide opportunities for feedback to ensure that funds are used in the most beneficial manner.

In keeping with the intent of the US Treasury and the American Samoa ARPA Oversight Office, DOC has adopted the following notice and comment timeline for proposed projects:

- A Notice of the DOC Proposed Project will be published online, in local newspapers, and via television or radio broadcasts.
- The Notice will specify that there will be minimum of fifteen (15) days for the public to provide comment either in writing or by attendance at scheduled public hearings.
- Concurrent to the publication of the Notice, a draft proposal and scope of work will be published on the ARPA website for the public to review.
- General meetings with the public will be scheduled and publicized within the fifteen (15) day Notice period. Email comments will also be accepted.
- Presentations to the Legislature will be conducted during the Notice period, as needed.
- At the close of the public comment period, the agency will have 20 days to revise the project as appropriate and submit the Final Draft to the ARPA Oversight Office.
- The Final Draft of the Project will be posted for public review once completed and certified by the ARPA Oversight Office.

It is the responsibility of DOC to publicize notices and adhere to the stated timelines. Upon the final approval of the ARPA Oversight Office, DOC will initiate a general public engagement schedule to inform the community of the final program guidelines.

#### Engagement Schedule

1. January 10, 2022: Initiate Community Engagement Plan
  - a. Notice to be published online, in local newspaper, TV & Radio
  - b. Application requirements and other program details are to be published at this time
2. January 18, 2022 & January 20, 2022: General Meeting with Public



3. January 31, 2022: Public Comment period closes
4. February 20, 2022: DOC to revise the project as appropriate and submits to ARPA Office
5. Ongoing: public awareness campaign