



Office of the Mayor

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Public Service Commission of Wisconsin
RECEIVED: 12/13/2023 9:00:54 AM

Dear Ms. Paske:

I am writing on behalf of the City of Superior in response to the objection posted from Charter, expressing their opposition to our grant funding application. We would like to express our opposition to the points raised by Charter.

Firstly, we acknowledge Charter's position that Superior has existing infrastructure, making us ineligible for funding. In our application, you will see that we disputed the accuracy of the maps and the current speed data. It is important to note that the grant funding application submitted by the City of Superior aims to serve the public interest by improving broadband accessibility and affordability for our community by creating an open access network. We have carefully assessed the needs of our constituents and developed a comprehensive plan to leverage the grant funding for the greater good of the city and its citizens. Speed test data, attached to our application, provides detailed information in support of this.

Charter also continues to be unaffordable to our residents. In order to receive 100/20 one needs to purchase their second to best package. It starts at \$69.99/month, but rising to \$104.99/month once the promotion ends. Small businesses requiring even higher speeds, they are paying much more.

In Charter's letter, they mention the pandemic as a source of problem with broadband service in our community. We completely agree. However, Charter held the monopoly in the City of Superior during the pandemic and could not maintain the speeds needed to support the needs of our community during the lockdown. Children in school and parents who were forced to work from home were left with constant disconnections from class and meetings and subpar speeds. These are the same speeds we are experiencing to this date.

Superior has been working on this project for over 4 years. In that time, there have been little to no improvements to Charter's speed or service to the City of Superior. It should also be noted that Charter increased their prices during the pandemic, when several families were already struggling or out of work. Even if improvements are made, Charter plans to use aging coax infrastructure, and therefore will continue to have issues specific to this outdated copper technology.

Concerning Charter's third objection in their letter, nowhere in Superior's application do we state that the project is not sustainable. The need for grant funding for the City is to provide reliable internet service more expeditiously to our constituents. Phase 1 for our project is already underway and anticipate a 40% take rate in the first five years, which will make the project profitable and support growth. The entire project is estimated to cost approximately \$50 million,

and our request for \$10 million will accelerate the second phase—expanding broadband service through our downtown to provide access to small businesses. This expansion will serve as a connecting point to our north end, one of the most diverse and low-income neighborhoods in Superior.

The ConnectSuperior project is shovel-ready for 2024. Since the submission of our application, the City of Superior has established a broadband utility and is currently seeking to fill the new position of Broadband Manager to lead the project.

The City of Superior is committed to enhancing the accessibility of high-quality broadband services for our residents and businesses. We believe that the grant funding we are seeking will contribute to addressing the broadband connectivity challenges faced by our community, especially considering the rapid technological advancements and the increasing reliance on digital infrastructure.

Therefore, we respectfully disagree with Charter's assessment that our grant funding application would be a poor use of available resources. We firmly believe that the proposed initiative aligns with the broader objectives of promoting equitable access to high-speed internet and fostering economic development in our region. The City of Superior was the only public entity that applied for the Capital Improvement Grant. We feel that as a public entity entering into a public private partnership with our ISPs that we most exemplify spirit of the grant and most closely match all given criteria, warranting precedence during the selection process.

Thank you for your attention to this matter. Should you require any additional information or wish to engage in further discussions, please do not hesitate to contact me directly.

Sincerely,

Rebecca Scherf
Chief of Staff
City of Superior