October 30, 2026

Texas Broadband Development Office
Texas Comptroller of Public Accounts
Submitted by email to broadband@cpa.texas.gov

Re: Public Comment on the Texas Broadband Development Office Strategic Plan Blueprint

Dear Comptroller Huffines and Broadband Development Office Team,

Borderplex Connect thanks the Texas Broadband Development Office for the opportunity to comment on the Strategic Plan Blueprint. We offer these comments to help Texas turn a historic infrastructure investment into lasting opportunity for every resident.

Borderplex Connect is a registered, regional nonprofit committed to bridging the digital divide in the economically challenged areas of Far West Texas and Southern New Mexico. Based in El Paso, it is a coalition of public, private and nonprofit partners that focuses on serving low-income households and rural communities with access to digital skills, internet-ready devices, and affordable broadband. Our region is home to a deeply bilingual workforce and serves as a critical hub for U.S. trade. Our bilingual talent and cross-border commerce position the region to turn every new connection into economic growth.

El Paso County faces digital disparities that affect economic opportunity, education, healthcare, and quality of life. In the 2020-24 ACS 5-year estimates, 34.4% of El Paso County residents are covered by Public Healthcare, higher than the Texas average of 29%. About 18,000 households in El Paso County have no computer and 14,000 households earning less than $20,000/year have no internet subscription. Language further complicates digital participation. There is a higher share of limited English-speaking households in El Paso (17.6%) than Texas overall (6.8%), reinforcing the need for multilingual digital skills training.

Our comments follow the Blueprint's sections and align with the standard that Texas receive full value for every dollar spent. The Hunt Institute's economic impact analysis estimated that a proposed fiber to the premises expansion in El Paso County would generate two dollars of regional output for every dollar spent between 2022 and 2040 (as a lower bound).[1] That value is realized when residents can afford, understand, and use networks, skills training, and internet-ready devices.

1. An Equal Seat for the Texans Who Use the Internet (Sections 3 and 6)

We support the named BDO contact for each Council of Governments region and the new regional work groups. Today the Blueprint's most structured touchpoints, including pre-NOFA conferences, post-NOFA conferences, and subgrantee meetings, center on providers and applicants. Residents experience every network each day and merit a standing role of equal weight. We recommend:

[1] Hunt Institute for Global Competitiveness, *Broadband Gaps in El Paso County and Economic Impacts of Closing Them* (El Paso: University of Texas at El Paso, 2022), 91.

- **Pre-NOFA conferences.** Add residents, nonprofits, health systems, libraries, schools, and workforce organizations to the "interested entities" invited to give feedback before a notice of funding availability is issued.
- **Regional work groups.** Define membership by seat category, with consistent representation for residents and households, community-based nonprofits, healthcare systems, public libraries, education and workforce organizations, local governments, and providers. Existing regional partnerships offer a ready foundation and reduce duplication.
- **Contacts and convenings.** Name the contact for the Council of Governments region that includes El Paso County promptly; hold convenings in English and Spanish; and offer convenings outside business hours so working families can attend.

2. Mapping, Data, and Challenges (Section 2)

We support the consumer speed test pilot and the standing challenge mechanism. To make both work for residents, we recommend:

- Publish county-level data and plain-language challenge instructions in English and Spanish, and state who may file a challenge.
- Create a structured process for libraries, health providers, nonprofits, and public agencies to submit documented observations about reliability, affordability, and access, with clear guidance on how the BDO will review them and use them in mapping, planning, and challenges.
- Welcome local knowledge of locations, including colonias, that the map lists as served, and where residents lack a dependable connection.

3. Affordability and Adoption (Sections 5 and 7)

The Blueprint's mission calls for affordable internet and Texas Government Code 490I.0103(a)(2) directs the office to engage in outreach on adoption and affordability. Section 7 treats adoption as the measure of whether the state's investment is being used. We recommend an affordability strategy that includes multilingual outreach and digital navigators. The Hunt Institute's El Paso County study found gaps in digital literacy across the county's regions and recommended pairing broadband expansion with programs that build digital literacy.[2] Borderplex Connect's digital fluency (skills) programming and Train-the-Trainer component for Community Health Workers/Promotoras give us local experience we would gladly share with the BDO.

We recognize that Section 5 completes the needs assessment "without committing state funds to new programming." The BDO does not need to deliver every program. Coordination with suh entities as local government, philanthropy, healthcare, libraries, nonprofits, and private partners addresses these needs, avoids duplication, and avoids unnecessary ongoing state obligations.

Federal support can carry much of this work. The Digital Equity Competitive Grant Program, a $1.25 billion federal program, was canceled in May 2025. NTIA has since published a request for comment on the program's application, and the parties reported to the U.S. District Court for

[2] Hunt Institute, *Broadband Gaps*, 91.

the District of Columbia on October 23, 2026 that NTIA remains on track to publish the notice of funding opportunity in December 2026.[3] We ask the BDO and the Legislature to affirm the value of this funding and to coordinate with Texas applicants, because adoption is what makes tax dollars spent on infrastructure pay off.

4. Key Performance Indicators (Section 7)

The "cost per location" measure tracks public dollars per connected location. We recommend adding indicators that show what households experience:

- Affordability, measured as the monthly cost to households, reported by county.
- Digital skills training and device access, reported by county.
- Connectivity and technology needs of community anchor institutions.

Where reliable data exist, the BDO can establish a baseline and report progress over time by geography. Together with the Blueprint's verified performance testing, these indicators show whether public investment is delivering meaningful use.

5. Satellite Cost and Capacity (Section 4.1)

The approved technology mix under the Broadband Equity, Access, and Deployment Program relies on low Earth orbit satellite service for 65,977 locations, more than a quarter of the 240,000 BEAD locations. We ask the BDO to report the monthly subscription and equipment costs these households face, and the network capacity and reliability they receive as more households subscribe. We also ask how the state will confirm that satellite services meet their requirements and what remedies the state holds if providers fall short. Extending the Section 7 verified performance testing and the Section 6 accountability tools to these locations gives residents the same assurance as every other technology.

6. Public Safety, Education, and Health Needs (Section 5)

We support the needs assessment required by Texas Government Code 490I.0107(b)(4). We ask the BDO to publish a timeline and an input process so community and health organizations can contribute data, including telehealth needs in El Paso and Far West Texas. We also recommend that the Blueprint name nonprofits, healthcare entities, libraries, and public service agencies as essential partners. These institutions depend on reliable, secure connectivity to serve residents, and regional partners can help identify ways to improve access to state portals, telehealth resources, and educational services.

7. Residual Unfunded Locations (Section 4.1)

We understand the BDO is weighing cost per location against timing as it evaluates NTIA's September 3, 2026 Supplemental Deployment Policy Notice for the approximately 2,000 eligible locations the final proposal did not fund. We urge participation. Our community partners offer

[3] Joint Status Report, *Nat'l Digital Inclusion All. v. Trump*, No. 1:25-cv-3606-JDB, ECF No. 64, at 1 (D.D.C. Oct. 23, 2026) (citing Agency Information Collection Activities; Submission to the Office of Management and Budget (OMB) for Review and Approval; Comment Request; Application for Competitive Grant Program, 91 Fed. Reg. 54848 (Aug. 25, 2026)).

local knowledge of unconnected locations in El Paso County and Far West Texas and of locations that the map lists as connected without reliable service.

8. Capital Projects Fund Closeout and E-Rate (Section 4.4)

We support the project level burn rate dashboard and monthly identification of at-risk projects. Grantees working with libraries, schools, and rural hospitals can help flag projects that need attention before the closeout dates. Library and school connections funded through the Capital Projects Fund depend on E-Rate to remain affordable after construction. Texas schools and libraries have received $5.38 billion in E-Rate disbursements since the program began, second only to California.[4] The FCC opened a proceeding in June 2026 on whether E-Rate should be limited or ended. Although the comment period has closed, we ask the BDO and Legislature to recognize E-Rate's long-term role in sustaining these investments.

9. Unobligated BEAD Funds (Section 4.5)

We respect the Blueprint's position that no commitment depends on the approximately $2 billion in unobligated BEAD funds. We recommend that the BDO and the Legislature state plainly that this money should stay in Texas. We further recommend that Texas prepare a readiness package now so the state can act as soon as NTIA authorizes new uses. The package can meet the Section 4.5 test directly by delivering measurable value that the private market is not already delivering, avoiding duplication of private investment, creating no recurring state obligations, and demonstrating a meaningful return. Workforce development, digital skills, and device access delivered through local partners fit that test, and Borderplex Connect and its partners can assist in documenting local needs and outcomes.

Texas has an opportunity to pair the largest deployment in its history with the affordability, skills, and community partnerships that make every connection count. We appreciate the opportunity to comment, and Borderplex Connect looks forward to working with the BDO to bring residents of El Paso and Far West Texas fully into the digital economy.

Sincerely,

A. Tirres

Andrea Tirres
CEO/President
Borderplex Connect
[redacted]

[4] Federal-State Joint Board on Universal Service, *Universal Service Monitoring Report, 2025*, CC Docket No. 96-45 et al. (Washington, DC: Federal Communications Commission, 2025), 57, table 4.2. Figures cover disbursements from the program's inception in funding year 1998 through June 30, 2025. Texas disbursements total $5,380,507 thousand, second to California at $7,135,054 thousand.