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Texas Broadband Development Office
P.O. Box 13528, Capitol Station
Austin, Texas 78711-3528

Subject: FiberLight Feedback on the Texas Broadband Development Office Strategic Plan Blueprint

To whom it may concern,

FiberLight is a Texas-based owner and operator of carrier-grade fiber infrastructure with more than 20,000 route miles of fiber, approximately 95% of which is deployed underground, operating across the state. Founded over 25 years ago, FiberLight has extensive experience designing, constructing, and operating middle-mile networks that support public-sector entities, wireless carriers, last-mile internet service providers, and enterprise customers. FiberLight's Texas network is engineered for long-term scalability and resiliency, with infrastructure capable of supporting bandwidths beyond 400 Gbps, with upgrade paths beyond that as demand continues to grow.

This comment is submitted to provide feedback on the Texas Broadband Development Office Strategic Plan Blueprint. We support the BDO's stated goals of expanding broadband availability, strengthening network resiliency, increasing affordability, and maximizing taxpayer value through strategic investments in broadband infrastructure.

FiberLight's Recommendations:

1. Categorical Exclusion Criteria

The Texas Broadband Development Office's (BDO) most recent Middle Mile Program application established a categorical exclusion prohibiting entities that provide retail broadband services to end users from participating as lead or joint applicants. This restriction excluded FiberLight and many other providers with established middle-mile infrastructure and experience serving rural and underserved communities, regardless of

their ability to meet the program's objectives. For FiberLight, this exclusion represents another barrier to participating in state and federal broadband funding programs. FiberLight was previously ineligible for the Broadband Equity, Access, and Deployment (BEAD) Program and the Texas Broadband Infrastructure Program (BOOT) because the company does not provide fiber-to-the-home (FTTH) services. Subsequently, FiberLight was excluded from the Texas Middle Mile Program because it provides retail broadband services to businesses in certain markets, despite its core business of providing wholesale middle-mile infrastructure. These successive exclusions highlight a disconnect between program eligibility requirements and the operational realities of the broadband industry, preventing established infrastructure providers from accessing funding opportunities based on specific aspects of their business models rather than their ability to deliver projects that advance broadband connectivity.

Attached is the letter FiberLight submitted to the Texas BDO during the Texas Middle Mile Program application window, providing feedback on applicant eligibility requirements and requesting reconsideration of the categorical exclusion of providers that offer retail broadband services. The letter further outlines FiberLight's middle-mile infrastructure, its role in serving rural and underserved communities, and potential approaches to eligibility that would better align program requirements with the public interest and the goals of expanding broadband connectivity across Texas.

2. Prioritize the Use of Existing Infrastructure While Supporting New Middle-Mile Investment

The BDO should require applicants to demonstrate that existing commercial fiber assets cannot reasonably meet the project's objectives. Texas benefits from significant privately funded middle-mile infrastructure, and leveraging these networks where it is feasible can accelerate deployment timelines, reduce costs, and improve project sustainability. However, leveraging existing infrastructure should not come at the expense of necessary new investment. Many areas of Texas remain underserved and lack sufficient middle-mile connectivity to support reliable, affordable broadband access. The Texas Middle Mile Infrastructure Fund plays a critical role in addressing these gaps by supporting new infrastructure where existing networks are unavailable, inadequate, or unable to meet regional needs. The BDO should take a balanced approach that encourages the use of existing infrastructure when practical while prioritizing strategic new middle-mile investments in underserved areas. This approach will maximize the impact of available

funding, avoid unnecessary duplication where feasible, and ensure that communities without adequate connectivity are not left behind.

3. Encourage Open Access and Competitive Connectivity

FiberLight supports the BDO's objective of encouraging open-access middle-mile infrastructure. Projects receiving BIF funding should provide transparent, nondiscriminatory access to qualified service providers to promote competition, increase consumer choice, and lower the cost of last-mile broadband deployment. The TMM Program identifies open-access networks as a key affordability mechanism, and this should remain a central evaluation criterion.

4. Focus on Scalability and Long-Term Resiliency

Middle-mile investments should favor fiber-based infrastructure capable of supporting future bandwidth requirements for government, education, healthcare, public safety, and emerging technologies. Investments should prioritize route diversity, redundancy, and disaster resilience to strengthen Texas' critical communications infrastructure. FiberLight agrees with the Strategic Plan and TMM Program both emphasize resiliency as a foundational program objective.

5. Reward Private Investment and Public-Private Partnerships

In February of 2026, FiberLight committed to investing approximately $500 million dollars in high-capacity fiber networks in West Texas. This investment allowed FiberLight's fiber footprint to expand to an additional 1.2 million miles, increasing FiberLight's fiber footprint to 4.8 million fiber miles. While millions of dollars provided are being invested, there are many areas of Texas that are still in need of a strong fiber network. Areas such as Aransas County and Refugio County would benefit significantly from additional middle-mile and last-mile infrastructure investments. Reliable fiber networks are essential not only for residents and businesses, but also for public safety agencies and first responders who depend on resilient communications during hurricanes, flooding events, and other emergencies. Applicants, like FiberLight, that have demonstrated a history of investing private capital in Texas broadband infrastructure should receive strong consideration. Public-private partnerships can extend connectivity farther while reducing the burden on taxpayers and the overall public funding required to reach underserved communities.

6. Measure Success by Broadband Outcomes

Funds should be awarded based on measurable outcomes, including:

- Reduction in middle-mile transport costs
- Increased access to underserved and unserved areas
- Number of last-mile providers enabled
- Network resiliency improvements
- Long-term sustainability of the infrastructure

These performance measures align with the BDO's emphasis on accountability, transparency, and taxpayer value.

FiberLight supports the BDO's commitment to transparency, fiscal responsibility, and data-driven broadband planning. The company's recommendation is that BIF-funded middle-mile investments focus on leveraging existing infrastructure, enabling open access, and promoting sustainable public-private partnerships that maximize broadband availability while safeguarding taxpayer resources.

FiberLight also supports the use of BDO funding to partner with private providers that are actively investing in broadband infrastructure. Strategic funding can help accelerate FiberLight's network expansion into unserved and underserved areas, extending reliable broadband access to communities that currently have limited or no connectivity. By leveraging existing private investment and infrastructure, the State can maximize the impact of public funds while reducing deployment costs and speeding time-to-service for residents and businesses.

With a thoughtful approach to middle-mile funding, Texas can accelerate broadband deployment, improve network resiliency, and create a stronger foundation for future economic growth and digital inclusion across the state. Through targeted public-private partnerships, Texas can ensure that broadband investments reach the communities that need them most while delivering long-term value for taxpayers.