



August 15, 2025

Louisiana Office of Broadband Development and Connectivity

Via Email to connect@la.gov

Re: Space Exploration Technologies Corp. (SpaceX) Comments on Louisiana Final Proposal

Louisiana Office of Broadband Development and Connectivity:

The State of Louisiana's Equity, Access, and Deployment (BEAD) program Final Proposal proposes to spend nearly \$500 million dollars to provide connectivity to its unserved and underserved locations. SpaceX applied to serve virtually all BEAD households for less than \$100 million dollars. As such, Louisiana's proposal includes over \$400 million dollars in wasteful and unnecessary taxpayer spending.

Louisiana's results demonstrate that it did not observe statutory requirements or program rules and did not conduct a competitive process. A process in which Louisiana is required to award grants based on the lowest cost to the program,¹ and awards 91.5% of funds to fiber projects at an average per-location cost of \$4,449, while rejecting applications at \$750 per location because the bid was based on Low-Earth Orbit (LEO) technology could not possibly be considered compliant, technology neutral or a "competition."

Louisiana's Final Proposal confirms this approach in describing its evaluation process. The Notice of Funding Opportunity (NOFO), as amended, explicitly provides that Louisiana "may not categorically exclude any given technology."² Yet, Louisiana created a checklist to do just that:

Following the sufficiency screen, ConnectLA had contract technical reviewers complete a Priority Broadband Project Technical Reviewer Checklist...

The checklist also required technical reviewers to determine whether applications that rely on spectrum assets (e.g., fixed wireless and LEO) fall partially or entirely within geographic areas that ConnectLA's analysis demonstrate LEO or fixed wireless providers will not be able to scale into the future due to a combination of limitations on available spectrum, the impact of tree canopy on service availability, high customer density and potential demand, the impact of 5G and/or other

¹ Broadband Equity, Access, and Deployment (BEAD) Program: BEAD Restructuring Policy Notice (June 6, 2025) (Policy Notice).

² Notice of Funding Opportunity, Broadband Equity, Access, And Deployment Program, 9 (May 12, 2022) available at: <https://broadbandusa.ntia.gov/sites/default/files/2022-05/BEAD%20NOFO.pdf> (NOFO).



wireless backhaul on residential end-user capacity, and the presence or absence of vertical assets and enterprise locations.³

SpaceX takes issue with the Final Proposals claim that “where appropriate, clarification and additional information from technical reviewers and/or subject matter experts).”⁴ Louisiana did not engage in a single technical discussion with SpaceX, and SpaceX is unaware of any individual or group with remotely equivalent expertise in the management of a LEO network generally, and certainly of no third party with better knowledge of the capabilities of the Starlink system than SpaceX itself.

SpaceX is aware, however, of a legion of fiber lobbyists and other hangers-on seeking to personally to benefit from massive taxpayer spending. In fact, SpaceX encourages NTIA to inquire into how many of these individuals are the very same “contract technical reviewers” evaluating SpaceX’s application. Louisiana has not shared any analysis with SpaceX that could even conceivably justify its determination with respect to SpaceX’s application.

Louisiana has not produced such materials because they do not exist, or, as SpaceX has seen time and time again, such “analysis” is blatantly agenda-driven and easily debunked upon the slightest scrutiny. Notably, Louisiana did determine that SpaceX’s Starlink service qualifies as “Priority Broadband” at approximately 10,327 locations. This is the exact same infrastructure and technology that would have served the other 117,515 locations in which Louisiana reached the opposite conclusion, further demonstrating the self-serving nature of Louisiana’s award decisions.

NTIA simply cannot approve the Final Proposal as it stands if the “Benefit of the Bargain” remains the goal. Louisiana must revise its final proposal to appropriately consider the applications received, or NTIA must reject its Final Proposal.

³ Louisiana Draft Final Proposal (August 8, 2025), available at: <https://connectla-backend.files.svdcn.com/production/Resources/GUMBO-2.0/Final-Proposal-08-2025-Updated-Documents/ConnectLA-Draft-Final-Proposal-08.08.2025.pdf?dm=1754671616> (Draft Final Proposal).

⁴ *Id.*