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RE: Empire State Development ConnectALL Office Five-Year Action Plan for NY BEAD Funding

Comments: New York's Initial Proposal of a 5 Year Plan to solve the Digital Divide has left out basic, material facts, creating distorted and even harmful public policies.

CHATGPT IRREGULATORS vs NY State Plan.

Using the cutting edge technology of an AI based analysis tool, we compared the state's 5 year plan with our 30 years of research, as well as filings in New York, the FCC, with our experts, forensic auditors and lawyers.

It also included "DISS-CONNECTED", a new summary book written for the general public that is being given away as a free download <u>https://irregulators.net/</u>

As you we read, this cursory examination shows that the 5 year plan is missing thousands of data points that make the entire plan suspect. And with decades of history, we know the 5 year plan will not accomplish the goals or solve the Digital Divide.

5 YEARPLAN: Welcome to the BEAD Five-Year Action Plan! This comprehensive PDF file outlines the State of New York's vision and objectives for achieving broadband equity, access, and deployment. With a focus on digital inclusion, this plan aims to overcome obstacles and barriers to ensure universal service for all.

5 YEARPLAN: What is Verizon plan

I'm sorry, could you please clarify which Verizon plan you are referring to? The PDF file contains information about various internet service providers and their plans, including Verizon, but it does not provide details about a specific Verizon plan.

5 YEARPLAN: how much fiber does verizon have

I'm sorry, the PDF file does not provide information on the total amount of fiber that Verizon has. However, the file does mention that as of June 2022, there were 177,040 fiber or other terrestrial connections in New York State 18.

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5 YEARPLAN: detail the Verizon cross-subsidies of wireless and fiber

I'm sorry, the PDF file does not provide information on Verizon's cross-subsidies of wireless and fiber. The file contains information about the New York State's broadband program and its efforts to achieve universal broadband access and equity, but it does not provide detailed information about specific internet service providers or their business practices.

5 YEARPLAN: how many are underserved in ny state

According to the information provided in the PDF file, less than 1% of locations in New York State are underserved, meaning they have fewer than two providers or service with speeds of at least 25 Mbps download but less than 100 Mbps available 9 17. However, it is important to note that the file does not provide a specific number of underserved locations in the state.

5 YEARPLAN: how many are unserved in new york

According to the information provided in the PDF file, 2.46% of locations in New York State are unserved, meaning that location has no wired or fixed wireless providers offering download speeds of at least 25 Megabits per second (Mbps) 17 12. However, it is important to note that the file does not provide a specific number of unserved locations in the state.

5 YEARPLAN: how many FWA wireless services are there in NY

I'm sorry, the PDF file does not provide information on the number of FWA (Fixed Wireless Access) services in New York State. The file contains information about the state's broadband program and its efforts to achieve universal broadband access and equity, but it does not provide detailed information about specific internet service providers or their services.

5 YEARPLAN: how many lines of fiber does Verizon have in NY

Regarding your question, the PDF file does not provide information on the number of lines of fiber that Verizon has in New York State. The file contains information about the state's broadband program and its efforts to achieve universal broadband access and equity, but it does not provide detailed information about specific internet service providers or their infrastructure.

IRREGULATORS: Welcome to DISS-CONNECTED, a comprehensive guide to understanding how America's big telecoms have stolen billions from the public and created the digital divide. This PDF file is packed with valuable information on the history of telecoms in America, the lies and overcharging that have occurred, and what needs to be done to fix the problem. Example questions: What is the main cause of the digital divide in America? How have telecoms been able to overcharge customers for so long? What can individuals do to help fix the problem of telecoms stealing from the public?

IRREGULATORS: 2 page summary

DISS-CONNECTED is a comprehensive guide to understanding how America's big telecoms have stolen billions from the public and created the digital divide. The PDF file is packed with valuable information on the history of telecoms in America, the lies and overcharging that have occurred, and what needs to be done to fix the problem. The introduction highlights the fact that America's telecom industry is overpriced and second-rate compared to other countries. The challenge of globalization and ensuring America's competitiveness has been a big lie, and the telecoms have been able to get away with overcharging customers for so long due to a lack of regulation and oversight. Chapter 1 delves into the challenge of providing affordable and accessible broadband to all Americans. The digital divide is a major issue, with millions of people lacking access to high-speed internet. The chapter also discusses the importance of net neutrality and how the repeal of net neutrality rules has harmed consumers. Chapter 2 explains how America got into this mess, with a focus on the history of telecom regulation and the ways in which the telecoms have been able to manipulate the system to their advantage. The chapter also discusses the role of the FCC and how it has failed to protect consumers. Conclusion 1 outlines a longterm strategy to redress the power of the Telecom Trust, including breaking up the big telecoms and creating a publicly owned broadband network. Conclusion 2 outlines several critical actions that individuals can take to address problems they find with their telecom bill(s), including going to the IRREGULATORS.ORG/Action website for the latest campaigns and actions and complaining to their service provider. Overall, DISS-CONNECTED is a must-read for anyone interested in understanding the problems with America's telecom industry and what needs to be done to fix them. publicly owned broadband network.

IRREGULATORS: tell me about Verizon cross-subsidies

According to 52 (Page 52) of the DISS-CONNECTED PDF file, Verizon has engaged in massive cross-subsidies of its wireless networks, where local phone customers have been charged for the fiber-optic networks used by Verizon and AT&T wireless. The IRREGULATORS, an independent consortium of senior telecom experts, filed for the FCC to investigate these cross-subsidies, including

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5G wireless. 32 (Page 32) of the same PDF file also explains how the telecoms secured FCC assistance in manipulating the accounting formulas so that the state utilities turned into a cash machine to fund the companies' other lines of business. For example, they diverted the local telecom utility construction budgets to build out their wireless networks. In this process, they successfully transformed the state utilities into funding mechanisms for their wireless and other non-utility enterprises, while leaving local telephone customers with antiquated service at higher prices. They also transferred a grossly inflated portion of their corporate operations expenses – e.g., executive pay, lobbyists, lawyers, and corporate jets -- over to local telephone customers. Overall, the texts suggest that Verizon has engaged in cross-subsidies and manipulated accounting formulas to fund its other lines of business, including wireless networks, at the expense of local telephone customers who have been charged for these expenses.

IRREGULATORS: how much overcharging has there been in the US

According to **5** (Page **5**) of the DISS-CONNECTED PDF file, the overcharges in the US telecom industry involve not only simple rigged service fees but also a host of miscellaneous fees and hidden fees like "Subscriber Line Charges" and "Inside Wire Charges." The text also suggests that far graver forms of overcharging are a consequence of accounting schemes and regulatory capture. **29** (Page **29**) of the same PDF file provides an estimate of up to \$17 billion annually in total revenue from miscellaneous and bogus charges, including charges for services that were never ordered by the customer. However, the text does not provide an overall estimate of how much overcharging has occurred in the US telecom industry. Overall, while the DISS-CONNECTED PDF file provides examples of overcharging in the US telecom industry, it does not provide a comprehensive estimate of the total amount of overcharging that has occurred.

5 YEARPLAN: Regarding your question, I'm sorry, I cannot provide an exact number of times Verizon is mentioned in the PDF file as it is a lengthy document with multiple sections and subsections. However, Verizon is mentioned in the list of providers that offer home and mobile internet services in New York State 116.

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IRREGULATORS: What evidence does the report provide to support the claim that Verizon diverted capex for wireless deployments?

The report provides several pieces of evidence to support the claim that Verizon diverted capex for wireless deployments instead of wiring municipalities and charged local phone customers for it. According to Part 2: DATA, Verizon Wireless cell sites were charged to the wireline capex budget, and there have been no audits or investigations of these cross-subsidies and financial machinations. The report also cites statements made by senior management, press releases, and an investigation by the New York Attorney General's Office, which all indicate that Verizon Wireless did not and is not paying most of the capital expenditures, but has dumped these expenses into the wireline networks.

IRREGULATORS: How can municipalities and states use the information in this report to fund their own broadband networks?

The report suggests that municipalities and states can use the information in this report to demand that Verizon and other telecommunications companies pay their fair share of taxes and fees, and to investigate the cross-subsidies and financial machinations that have allowed these companies to divert capex for wireless deployments instead of wiring municipalities. The report also recommends that municipalities and states explore alternative funding models, such as public-private partnerships, to build their own fiber optic and wireless broadband networks.

IRREGULATORS: Are there any legal implications for Verizon's actions outlined in this report?

The report suggests that there may be legal implications for Verizon's actions outlined in this report. For example, the report cites an investigation by the New York Attorney General's Office, which found that Verizon had failed to deliver on its promise to provide fiber optic service to all New York City residents by 2014, and that the company had misled customers and regulators about its progress. The report also suggests that Verizon's cross-subsidies and financial machinations may violate state and federal laws, such as the Telecommunications Act of 1996 and the Communications Act of 1934. However, the report does not provide a definitive answer on whether or not Verizon's actions are illegal, and it recommends that municipalities and states seek legal advice before taking any action. **5 YEARPLAN:** COMPARE 5 year: What evidence does the report provide to support the claim that Verizon diverted capex for wireless deployments?

Regarding your question, I apologize, but the PDF file does not contain any information or claim about Verizon diverting capex for wireless deployments. The file focuses on the state's broadband program and its efforts to achieve universal broadband access and equity, but it does not provide any specific information about individual internet service providers or their financial decisions.