

Before the  
DEPARTMENT OF COMMERCE  
National Telecommunications and Information Administration  
DEPARTMENT OF AGRICULTURE  
Rural Utilities Service  
FEDERAL COMMUNICATIONS COMMISSION

Joint Request for Information ) NTIA Dkt. No. 090309298-9299-01  
American Recovery and )  
Reinvestment Act of 2009 ) FCC GN Dkt. No. 09-40  
Broadband Initiatives )

COMMENTS OF SPRUCE KNOB SENECA ROCKS TELEPHONE, INC.

Spruce Knob Seneca Rocks Telephone, Inc. ("SKSRT") files these comments in response to the above-captioned joint request for information by the National Telecommunications and Information Administration ("NTIA") and the the Rural Utilities Service ("RUS")<sup>1</sup> and the related Public Notice by the Federal Communications Commission ("FCC") seeking information in its advisory role to NTIA and RUS as they establish their programs.<sup>2</sup>

SKSRT is a not-for-profit telephone cooperative dedicated to providing communication services to its subscriber members at a reasonable cost, with a strong commitment to excellent service.

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<sup>1</sup> Joint Request for Information and Notice of Public Meetings, 74 Fed. Reg. 10716 (Mar. 12, 2009).

<sup>2</sup> *Comment Procedures Established Regarding the Commission's Consultative Role in the Broadband Provisions of the Recovery Act*, FCC Public Notice, DA 09-668 (rel. Mar. 24, 2009).

Located in Pendleton County, West Virginia, SKSRT was formed in 1972 with the help of an RUS loan. It serves approximately 1200 subscribers, offering DSL, dial-up, long distance, voice mail and related service offerings. Recently SKSRT has been upgrading its facilities with a fiber to home installation project for its entire 250 mile service area.

SKSRT is precisely the type of company that NTIA and RUS should be working with to make funds available to help rural customers. SKSRT serves a beautiful but remote, rural area in West Virginia with extremely mountainous terrain. Its service territory includes only about 2.5 customers per square mile, and most customers have no other communications options. With the installation of the fiber SKSRT will be able to provide high speed broadband services to its customers.

SKSRT is exploring a variety of technological options to provide improved and more varied communications services at reasonable rates to its customers. For example, SKSRT plans to begin an IPTV offering over its fiber network within the next year, and if funds are available for further improvements, it would like to offer additional broadband services to its rural customers, perhaps with some innovative wireless options.

Recognizing that the NTIA, RUS and the FCC have just begun the process of taking comments, holding workshops and having ex parte meetings, SKSRT hopes that the process will include further opportunity for comment once preliminary rules and guidelines are developed.

SKSRT applauds all the agencies for trying to design a process that is as transparent as possible and open to the entities that will serve rural populations. SKSRT encourages the NTIA, RUS and the FCC in its advisory role to keep the process as clear and uncomplicated as is feasible, so that companies and other entities seeking funding do not encounter excessive layers of review.

SKSRT supports the role of the federal agencies in this process, and does not believe that it is necessary, as some parties have requested, that funding be filtered through state regulatory agencies, unless that funding is directly for governmental projects. The NTIA and RUS have been allocated sufficient funding and, if necessary can develop the staffing resources to directly develop rules for, assess and fund projects proposed by entities seeking grants and loans.

SKSRT hopes to be an active participant in the processes to be established by NTIA, RUS and in ancillary proceedings at the FCC, and looks forward to offering its perspective as a day-to-day provider of technologically advanced services to rural customers.

SKSRT supports the deployment and use of broadband and other technologically advanced services to rural areas to promote civic participation, job growth, economic advancement, education and the other known public interest benefits that such deployment encourages.

Therefore, SKSRT respectfully requests that NTIA, RUS and the FCC include SKSRT's undersigned counsel on all forthcoming e-mail and service lists for notices and other information that will be distributed during development of policies and rules in this process, and SKSRT will comment further during the course of these proceedings.

Respectfully submitted,

(electronically filed)

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