

Broadband USA Applications Database

Applicant Name: Keystone Initiative for Network Based Education and Research

Public Notice Submissions

-----**Service Area:** PennREN

Submitter: CenturyLink

Comment: CenturyLink is submitting data that shows the application's proposed service area is not underserved or unserved, under program guidelines. Accordingly, the application must be denied as ineligible. With limited funding and a large pool of applications, program grants and loans must be directed only to areas that are truly underserved or unserved, as stipulated in the program guidelines.

CenturyLink can certify that its affiliates currently offer broadband service in some or all of the applicant's proposed service areas. We attach a representative sample of areas where the application overlaps our existing broadband deployment. This data is not exhaustive; the application may include other areas also currently served with broadband by CenturyLink or other providers. We will provide additional information on request if that will further assist the agency's review.

CenturyLink also provides data showing broadband availability in local telephone exchanges within the proposed service areas. This includes areas served by CenturyLink and/or other broadband providers. This data further show the applicant would duplicate and overlap existing broadband services in the proposed service areas.

Submitter: Last Mile, Inc (d/b/a Sting Communications)

Comment: PennREN has proposed an over-build, middle mile project that essentially follows existing fiber optic networks with the goal of creating a pure education and research network. We fail to see how this is in the public's best interest and reduces any broadband disparities when: (1) this network could be created today through current networks readily available in the same markets/service areas as the grant, and (2) sustainability for the network hinges on offering enhanced broadband services to Pre-K through 12 and higher education systems, healthcare networks and government offices statewide. It is

important to note that each of these constituencies already have broadband projects underway or operational today.

This is a highly redundant and unnecessary project that ignores the existing statewide, middle mile broadband networks previously funded by federal (eRate and FCC Rural Healthcare) and PA state (efund) grants. There are numerous middle mile, broadband networks offering competitively priced 100 Mbps to 10 Gbps service to schools, hospitals and government agencies in the exact same service areas proposed by PennRen. In fact, there is a nearly identical Pennsylvania Intermediate Unit Network (PAIUNet), www.paiunet.org, with over 20 high speed Ethernet Points of Presence, providing 100 Mbps connections to all 29 PA Intermediate Units serving all 501 school districts in the state.

PAIUNet is a statewide, high-speed educational network that enables educators and students throughout Pennsylvania to create, communicate, collaborate and share valuable resources to enhance student learning.

PAIUNet provides PA Intermediate Units (IUs) and K-12 schools a network that is 50 times faster and 95% less expensive than using the commodity Internet to connect to one another. It increases connectivity between Pennsylvania IUs and school districts providing access to content and resources that will transform the way educational services and information are delivered.

PAIUNet connects all 29 IUs and their member school districts throughout the Commonwealth. It also connects public library systems and charter schools. This project will have an impact on all areas of IU and school services from the business office to the classroom.

This project is in year 2 of a 5 year commitment supported by the FCC USAC eRate program. Broadband rates of \$1,400 to \$2,200 per month for 100 Mbps service and \$1,800-3,000 for 1 Gbps service with a 50% subsidy provided by eRate make this a very cost effective solution.

In addition, Pennsylvania has previously received 5 FCC Rural Healthcare grants, worth more than \$8 million, that have provided funding to implement middle mile broadband service in many of the same areas proposed by PennRen. One of the largest of these projects, Pennsylvania Mountains Health Alliance (PMHA), www.pmhalliance.org, already provides broadband service to over 20 community healthcare facilities for the delivery of Telemedicine, Internet and shared IT services. PennRen proposes to serve these same facilities with their project which is redundant to the existing support provided by

FCC Rural Healthcare. The community hospitals have access to 100 Mbps to 1 Gbps Ethernet, MPLS, broadband service at prices from \$1,800 to \$3,000 with an 85% subsidy from the FCC Rural Healthcare program, as well as private support from healthcare insurance company grants.

PennRen's proposed users could easily leverage the existing PAIUNet and PMHA Rural Healthcare middle mile networks in operation today. These networks, and last mile access to the anchor institutions, are provided by a consortium of providers, including Sting Communications, Level 3, Comcast, Verizon, Zito Media, CenturyLink, Windstream, Zayo, DQE, PenTeleData, First Communications, VelocityNet and many others.

The \$129 million project proposed by PennRen could easily provide over 1200 anchor organizations free 100 Mbps service, for the next 5 years, if applied to the monthly payments to existing middle mile/last mile networks already in place in the proposed service areas. This project is a complete overbuild of existing open network, broadband facilities, and does not leverage any of the millions of federal eRate and FCC Rural Healthcare funds already spent to build a statewide education and healthcare broadband network in Pennsylvania.

We encourage NTIA to redirect PennRen to the existing statewide middle mile network providers who stand ready to support their goals to offer affordable, enhanced broadband services to Pre-K through 12, higher education, healthcare, libraries and state and local governments.

Submitter: Windstream

Comment: Windstream's data strongly suggest that the proposed funded service area likely does not qualify as an underserved area. Windstream offers facilities-based, terrestrial broadband service (meeting the definition set forth in the Notice of Funds Availability) to some of the households in the proposed funded service area, and such households can readily subscribe to Windstream's broadband service upon request. Windstream also has reason to believe that competitive broadband offerings are available in exchanges overlapping the proposed funded service area. Given this information, agency officials should further investigate existing broadband offerings within the proposed funded service area, so that officials can be sure that the area, in fact, qualifies as underserved.

Windstream is a communications and entertainment company with more than 1 million broadband customers in 16 states. Investing more than \$200 million in broadband deployment over the last several

years, Windstream now offers approximately 89% of its 3 million voice customers access to quality and affordable broadband service.

The agencies define an “underserved area” as follows: “Underserved area means a proposed funded service area, composed of one or more contiguous census blocks meeting certain criteria that measure the availability of broadband service and the level of advertised broadband speeds. These criteria conform to the two distinct components of the Broadband Infrastructure category of eligible projects- Last Mile and Middle Mile. Specifically, a proposed funded service area may qualify as underserved for last mile projects if at least one of the following factors is met, though the presumption will be that more than one factor is present: 1. No more than 50 percent of the households in the proposed funded service area have access to facilities-based, terrestrial broadband service at greater than the minimum broadband transmission speed (set forth in the definition of broadband above); 2. No fixed or mobile broadband service provider advertises broadband transmission speeds of at least three megabits per second (“mbps”) downstream in the proposed funded service area; or 3. The rate of broadband subscribership for the proposed funded service area is 40 percent of households or less. A proposed funded service area may qualify as underserved for Middle Mile projects if one interconnection point terminates in a proposed funded service area that qualifies as unserved or underserved for Last Mile projects.”

Submitter: Comcast Cable

Comment: Attached is a summary of the Comcast Cable homes passed, subscriber and advertising information related to the service areas encompassed by this application.