

## Broadband USA Applications Database

**Applicant Name:** Trillion Partners

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### Public Notice Submissions

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**Submitter:** Santa Rosa Telephone Cooperative, Inc.

**Comment:** Santa Rosa Telephone Cooperative, Inc. provides comments on this application regarding the underserved designation of the proposed funded area.

**Submitter:** Cap Rock Telephone Cooperative

**Comment:** Region 17 (Texas) is being labeled as an Underserved rural area. We challenge the position of this request regarding the Region 17 Texas as an underserved location.

As the Incumbent Local Exchange Carrier in a portion of the Region 17 area (see map) we provide landline and broadband service offerings in 7 Counties (Cottle, King, Motley, Dickens, Crosby, Kent and Garza) Texas. It is important to note that the rural areas are sparsely populated and provide many challenges in providing service. The communities within Region 17 Texas have broadband services readily available. Each county listed above has multiple broadband service providers available today. Cap Rock Telephone Cooperative, Inc. is currently one broadband service provider in the Region 17 Texas rural area. Satellite service providers, cable broadband service providers and wireless broadband opportunities are available in Region 17 Texas. Competition exists with limited potential customers.

Cap Rock Telephone Cooperative, Inc. has and will continue to invest in providing services to customers in rural Texas.

Due to competition it is our request that any proprietary information contained within this formal response filing is kept confidential.

**Submitter:** Poka Lambro Telephone Cooperative, Inc.

**Comment:** Poka Lambro is a member-owned provider and has been providing quality telecommunications services within the proposed funding area since 1950. Poka Lambro currently provides both terrestrial and wireless broadband service that is ubiquitous throughout its service area.

**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:** KeyOn Communications

**Comment:** KeyOn Communications currently provides access at speeds of at least 768kbps downstream and at least 200kbps upstream to more than 50% of the homes in the designated area.