

Broadband USA Applications Database

Applicant Name: Telephone Service Company

Public Notice Submissions

-----**Service Area:** TSC

Submitter: Benton Ridge Telephone Company

Comment: Watch Communications, a subsidiary of the Benton Ridge Telephone Company and a Wireless Data, Voice and Video Provider using FCC licensed 2.5 GHz spectrum to deliver broadband service in the proposed funded service area, is providing information that shows that the proposed funded service area has 3 Mbps advertised service, over 50% broadband coverage and over 40% broadband subscriber penetration and does not qualify as unserved or underserved per the definitions of the NOFA.

Submitter: Time Warner Cable, Inc.

Comment: As shown in the attached map and exhibit, TWC currently provides broadband Internet access service in the Proposed Funded Service Area. In addition, we advertise service of speeds above 3 Mbps throughout this service area. We pass over 50% of households, and either (1) have actual broadband subscribership of over 40% of the households in these census blocks or (2) the combined broadband subscribership of the wireline broadband providers (including TWC) in these census blocks is reasonably likely to exceed 40%. Therefore, that portion of the proposed funded service area that overlaps Respondent's service area reflected in this response is neither "unserved" or "underserved."

Submitter: New Knoxville Telephone Company

Comment: New Knoxville Telephone Company is an Independent Local Exchange Carrier (ILEC) that currently offers broadband service in and around New Knoxville, Ohio. The Applicant's characterization of the Auglaize and Shelby county Ohio portion of its service area as "underserved" is incorrect. We provide broadband service where our ILEC service area overlaps these counties today. Additionally, the Auglaize County technology assessment published on www.connectohio.org states that broadband adoption in Auglaize County is 56%. Additionally, the same technology assessment on connectohio.org states that the broadband adoption in Shelby county is 75%. The same technology assessment states that the broadband adoption in the remaining counties of the Applicant's proposed service area is: Allen--56%, Hardin--36% and Logan--47%. Taken together, the weighted average broadband penetration

of all the counties included in the Applicant's proposed service area is 51.4%, well beyond the level to qualify as underserved. The Applicant's depiction of its service area as "underserved" is therefore incorrect.

Submitter: Gold Radio Group, LLC

Comment: Gold Radio Group, LLC is a wireless broadband internet service provider that currently offers service in and around Lima, Ohio. The Applicant's characterization of the Allen county Ohio portion of its service area as "underserved" is incorrect. We provide broadband service there today. Additionally, the Allen County technology assessment published on www.connectohio.org states that broadband adoption in Allen County is 53%. Additionally, the same technology assessment on connectohio.org states that the broadband adoption in Auglaize county is 56% and in Logan county is 46%. Taken together, these counties comprise the bulk of the Applicant's service area. The Applicant's depiction of its service area as "underserved" is therefore incorrect.

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: Buckland Telephone Company

Comment: Buckland Telephone currently provides Digital Video, Data Internet, and Telephone Services in our own service area and the proposal overlaps our service area.

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.