

Broadband USA Applications Database

Applicant Name: GlenMartin, Inc.

Public Notice Submissions

-----**Service Area:** 5 Clinton Benton

Submitter: CenturyLink

Comment: The proposed service areas are not wholly underserved or unserved. 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. Attached is a state map that is a representative sample of areas where the application overlaps our existing broadband deployment. CenturyLink also provides data showing broadband availability in our local telephone exchanges within the proposed service areas. We will provide additional information on request if that will further assist the agency's review. This data is not exhaustive; the application may include other areas also currently served with broadband by other providers, which should be considered in the assessment of the application. Our data combined with that of other broadband providers would likely show further duplication and overlap of broadband services in the proposed service areas. CenturyLink has committed to upgrade and extend broadband. CenturyLink has an extensive broadband footprint today, and has committed to extend that service even further. As part of its merger commitments to the Federal Communications Commission, CenturyLink committed to offer retail broadband Internet access service to 100% of its broadband eligible access lines by July 1, 2012. Consequently, virtually no areas served by CenturyTel or Embarq local operating companies, in any state, will be underserved or unserved at the end of three years. CenturyLink also agreed to meet targets for minimum download speeds. CenturyLink will ensure availability of retail broadband Internet access service with a download speed of 1.5 Mbps to 87% of the broadband eligible access lines by July 1, 2011. It will ensure availability with a download speed of 3 Mbps to 75% of broadband eligible access lines by July 1, 2010, to 78% of broadband eligible lines by July 1, 2011, and to 80% of broadband eligible lines within 3 years of the close date. Nationwide, our average tele-density is 23 customers per square mile. This commitment ensures availability of broadband even to very rural consumers. The agency should consider the importance of this commitment, as CenturyLink's continuing investment inevitably will make applications that overlap CenturyLink service areas less viable. CenturyLink has proven, industry-leading experience in deploying broadband networks and services using both wireline and wireless technology, and a strong commitment and focus on rural areas. Today, it serves over 7 million access lines and 2.1 million broadband customers in 33 states.

Submitter: Windstream

Comment: Windstream's data strongly suggest that the proposed funded service area likely does not qualify as an unserved area. Windstream offers facilities-based, terrestrial broadband service at advertised speeds of greater than 768 kbps downstream and 200 kbps upstream to some of the households within 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 unserved.

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 "unserved area" as follows: "Unserved area means a proposed funded service area, composed of one or more contiguous census blocks, where at least 90 percent of households in the proposed funded service area lack access to facilities-based, terrestrial broadband service, either fixed or mobile, at the minimum broadband transmission speed (set forth in the definition of broadband above). A household has access to broadband service if the household can readily subscribe to that service upon request."

-----**Service Area:** 5 Clinton Henry

Submitter: Imagination Inc dba I-Land Internet Services

Comment: Imagination Inc, dba I-Land Internet Services, respectfully requests that the services we offer and the customers we serve are considered in determining funding for this application. We offer point-to-point wireless broadband service and DSL in numerous areas throughout Missouri, including areas within this application, and are continually expanding our service areas. We have been providing broadband service for over five years and deployed WiMax service in the past year. We currently

provide broadband service to well over 3,000 customers, and those customer numbers will only continue to grow significantly as we expand our service areas. We are committed to investing in our networks in order to provide broadband service to both our existing and future customers.

Submitter: Charter Communications

Comment: Charter Communications ('Charter'), a broadband service provider, has invested capital to provide a full range of Broadband services, including High Speed Internet services, in this service area. The applicant's request in the proposed under-served and un-served service area would create an overlap in Charter's service area. Charter's response includes the necessary information to validate the overlapping condition as a result of this applicant's request.

-----**Service Area:** 5 Cinton Hickory

Submitter: American Broadband Wheatland area

Comment: N.W. Communications is an incumbent cable television provider with municipal franchise authority to offer cable television service in 11 communities in western Missouri. N.W. Communications offers broadband internet and data services utilizing cable modem technology. N.W. Communications offers broadband services at speeds that meet and exceed the minimum download (768 Kbps) and upload (200 Kbps) speeds defined in the NOFA. N.W. Communications does business as (dba) American Broadband in Missouri. This specific response is from the perspective of the cable modem broadband service that is offered within the municipal franchised areas that overlap with GlenMartin's Last Mile Stimulus Application in Hickory County, Missouri. N.W. Communications (dba American Broadband) advertises broadband service alternatives that meet and exceed minimum download and upload speeds defined in the NOFA.

N.W. Communications enjoys healthy broadband penetration rates in many of census blocks contained within its serving areas, and this does not count/include the penetration of Century, which is the ILEC in Hickory County (where this application overlaps N.W. Communications), or other broadband competitors that operate in the service area that GlenMartin has applied for.

The GlenMartin application overlaps with 399 census blocks in which N.W. Communications offers cable modem broadband speeds. In these 399 census blocks, N.W. Communications provides broadband service to 158 residential customers and 12 business customers. N.W. Communications approaches 10% penetration of residences all by itself and this does not include the number of residences served by Century and other broadband competitors. Thus, the overlap area in the GlenMartin application is not

unserved and it is not underserved. Furthermore, N.W. Communications offers its cable modem broadband service at speeds that exceed the NOFA minimums and exceed 3 Mbps, and N.W. Communications (doing business as American Broadband) advertises speeds that exceed 3 Mbps.

The GlenMartin stimulus application should be rejected for several reasons, which include but are not limited to:

1. GlenMartin applied for Stimulus dollars in areas (Census Blocks) that are not unserved or underserved.

2. The GlenMartin application is overly broad because it did not seek to perform validations of broadband penetration rates at the Census Block level, whereas N.W. Communications currently provides, advertises, and tracks broadband penetration to the Census Block level within its designated serving areas.

3. Broadband stimulus dollars should not be directed to areas that do not meet the definitions of unserved or underserved territory.

4. GlenMartin proposes a wireless technology solution. Only Fiber-to-the-Premise solutions offer a long term future-proof solution for meeting the challenge of a rapidly increasing definition of minimum download and upload speeds. GlenMartin is only one of several wireless providers within the geography applied for that already offer data services over their wireless networks (Verizon, AllTel, Sprint, AT&T, etc.).

5. GlenMartin's application overlaps with the designated service areas of N.W. Communications. It is not apparent that GlenMartin has addressed the challenge of its application's ability to be economically sustainable in areas that lack population density, and are already served by multiple broadband providers.

6. Beyond initial network deployment, wireless infrastructure solutions have not demonstrated the ability to create sustained employment opportunities within the immediate service area. This is contrasted by the fact that N.W. Communications has a resident work force, located within its designated serving areas in western Missouri, and it has a history of sustained employment.

-----**Service Area:** 5 Clinton Camden

Submitter: TDS Telecom

Comment: TDS Telecom offers 3Mbps broadband service within the applicants proposed service area and provides broadband service to customers pursuant to the NOFA definitions.