

## Broadband USA Applications Database

**Applicant Name:** GlenMartin, Inc.

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### Public Notice Submissions

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-----**Service Area:** 8 Sedlia Ray

**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:** Green Hills Telephone Corp, dba: Green Hills Co's

**Comment:** • 100% of Green Hills' service area has access to facilities based Broadband in excess of 768k down/200k up speeds.

- Green Hills' advertises and provides multiple service speeds including an offering with 3 Meg down.

-----**Service Area:** 8 Sedalia Morgan

**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:** 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.”

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-----**Service Area:** 8 Sedalia Lafayette

**Submitter:** Alma Communications

**Comment:** Alma Communications provides fiber to the home in its entire service area, therefore providing high speed internet to all customers that request that service.

**Submitter:** CenturyLink

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**Submitter:** Citizens Telephone Company of Higginsville, MO

**Comment:** Glen Martin's proposed project covers all of the exchanges served by Citizens Telephone Company of Higginsville, Mo (Citizens). These areas are currently capable of receiving high speed broadband access at speeds up to 12 mbps down. As such, these areas are "SERVED" based on the definitions as established in the Notice of Funds Availability (NOFA). In this public notice response Citizens is providing; 1) a map of the overlapping area where Citizens provides broadband services, 2) Citizens DSL high speed Internet advertising 3) the number of residential households and business establishments capable of receiving broadband services from Citizens within our service area, 4) the number of residential households and business establishments subscribing to our broadband, 5) the advertised download and upload speeds and service rates, and 6) comments addressing the existing services offered within the proposed funded service area. Citizens contends there is an error in the mapping tool database. The business polygon is listing 705 businesses, when the actual number of businesses in the serving area is by our record approximately 370.

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