

## Broadband USA Applications Database

**Applicant Name:** Clackamas County, OR

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### Public Notice Submissions

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-----**Service Area:** Clackamas Fiber Ring

**Submitter:** Cascade Utilities, Inc. dba Reliance Connects

**Comment:** Cascade Utilities currently provides broadband speeds beginning at 1.5 Mbps up to 6.0 Mbps throughout 100% of the Applicant's proposed funded service area that overlaps Cascade's service area. The Clackamas County, OR application does not indicate on its filing whether its proposed funded service area qualifies as "unserved" or "underserved." In any case, we believe that the Applicant's proposed funded service area does not qualify as either as the comments elsewhere illustrate. Cascade also offers speeds below broadband as defined in the NOFA (512 kbps/512 kbps) for \$27.95 per month. However, no customers in the proposed funded service area subscribe to this service.

**Submitter:** Clear Creek Telephone & TeleVision

**Comment:** Clear Creek Telephone & TeleVision has several significant concerns about the application filed by Clackamas County, Oregon called the Clackamas Broadband Innovation Initiative (CBII). The County characterizes their proposal as seeking to equalize the disparity in broadband access between the urban and rural areas of the county. The proposed area is improperly characterized as unserved. The county claims this project will address the significant cost of high-bandwidth backhaul to remote areas. The proposed area already has affordable bandwidth available. The project is seeking funding as a middle mile project. Under the terms of the Notice of Funding Availability, if the primary purpose of the project is to connect the 94 community anchor institutions as end users, the project should be classified as a last mile project. This misclassification is a procedural error that should result in the application's rejection as a middle mile project.

**Submitter:** Molalla Telephone Company

**Comment:** Molalla Telephone Company (Molalla) offers broadband service to 100% of the Applicant's proposed funded service area overlapping Molalla's service area at broadband speeds of up 40 Mbps upstream and 10 Mbps downstream over fiber-to-the home infrastructure. Molalla also has GigE service to all government offices, schools and health care facilities both in the proposed funded service area as well as in the rest of Molalla's service area. Additionally, fiber optic cable is available that could be

leased by the Applicant through the entire overlapping proposed funded service area. The Clackamas County, OR application does not indicate on its filing whether its proposed funded service area qualifies as "unserved" or "underserved." In any case, we believe that the Applicant's proposed funded service area does not qualify as either as the comments elsewhere illustrate.

**Submitter:** WaveDivision Holdings, LLC

**Comment:** WaveDivision Holdings, LLC ("Wave") is a facilities-based, terrestrial provider of high speed Internet, cable television and telephone services. Wave challenges the implicit assertion incorporated in the middle mile application of Clackamas County, OR ("Applicant") and is filing this objection to Applicant's application for federal funding because Wave currently has fiber facilities in the proposed funded service area that are made widely available for use as middle mile connections.

**Submitter:** COLTONTEL

**Comment:** The Clackamas County application does not indicate on its filing whether its service area qualifies as "unserved" or "underserved." It only outlines their service area. In any case, we believe that this proposed funded service area does not qualify as either "unserved" or "underserved." COLTONTEL provides broadband service to 100% of the overlapping area between COLTONTEL's service area and Clackamas County's proposed funded service area. See additional proprietary comments below on the broadband marketplace in the proposed funded service area.

**Submitter:** Canby Telcom

**Comment:** The Clackamas County application does not indicate on its filing whether its service area qualifies as "unserved" or "underserved." It only outlines their service area. In any case, we believe that this proposed funded service area does not qualify as either "unserved" or "underserved." Canby Telcom provides broadband service to 100% of the overlapping area between Canby Telcom's service area and Clackamas County's proposed funded service area. See additional proprietary comments below on the broadband marketplace in the proposed funded service area.

**Submitter:** Qwest

**Comment:** As authorized by the BIP and BTOP Notice of Funds Availability and the Public Notice associated with the publication of BIP and BTOP broadband infrastructure project funding applications found on the BroadbandUSA.gov website, Qwest responds with broadband service data to the application of Clackamas County, OR for funding for an area neither represented as "unserved" nor "underserved" that is located, in whole or in part, in Qwest's broadband service area.

