

Broadband USA Applications Database

Applicant Name: Gray Holdings Corp

Public Notice Submissions

-----**Service Area:** Arizona Recreation Locations - Part 3

Submitter: NPG Cable, Inc.

Comment: NPG Cable, Inc. currently provides sufficient broadband access and broadband services to end users and/or end user devices in the Service Area identified by the applicant below.” These services provide data rates that far exceed the underserved requirements set forth by BTOP/NITA, in addition NPG’s current wire solution scales to provide data rates that are unachievable through wireless solutions.

Submitter: CommSpeed, LLC

Comment: CommSpeed is a Wireless ISP and has been using BRS\EBS spectrum to deliver broadband services into Gray Holding Corp Recreation Part 3 proposed funded service area.

-----**Service Area:** Arizona Recreation Locations - Part 4

Submitter: NPG Cable, Inc.

Comment: NPG Cable, Inc. currently provides sufficient broadband access and broadband services to end users and/or end user devices in the Service Area identified by the applicant below.” These services provide data rates that far exceed the underserved requirements set forth by BTOP/NITA, in addition NPG’s current wire solution scales to provide data rates that are unachievable through wireless solutions.

-----**Service Area:** Montana Recreation Locations

Submitter: Lincoln Telephone Company, Inc.

Comment: Lincoln Telephone Company can serve all households and businesses in our service area with at least 768k or greater.

Submitter: DigitalBridge Communications Corp.

Comment: DigitalBridge Communications (“DBC”) currently offers true 4G, WiMAX broadband service in the applicant’s PFSA, serving an active base of residential and business subscribers in the PFSA. Other companies also serve the PFSA - DBC actively competes with cable (Bresnan) and DSL (Qwest) broadband providers in the PFSA. DBC estimates 40% overlap of its coverage with the PFSA based on households served.

Submitter: Bresnan Communications

Comment: Based on our research and exposure in this service area, we’ve concluded that this proposed funded service area fails to meet the NOFA definitions of underserved or unserved as defined in NOFA.

Bresnan, along with other local telcos such as Qwest, provide broadband service in this service area via cable modem and DSL technology. Bresnan provides several tiers of broadband service with download speeds ranging from 1.5mbps to 15mbps.

Our market research and in-depth knowledge of our markets show that we occupy approximately 45-55% of the market share of broadband subscribers in this market, with the remaining distributed among incumbent telcos. With the subscribers and penetration levels entered below, this market area exceeds the penetration and access thresholds as defined in the NOFA, thus making this application ineligible for BTOP/BIP funds in this proposed funded service area.

We have outlined our service areas on the mapping tool provided. Also, see the attached supporting document for additional information regarding our product offering and price points in this market. We also entered confidential and sensitive subscriber details to support our case.

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 Gray Holdings Corp for funding for an area represented as “unserved” that is located, in whole or in part, in Qwest’s broadband service area

Submitter: Range Telephone Cooperative

Comment: Range Telephone Cooperative, Inc. (Range) is an Independent Local Exchange Carrier (ILEC) and a Competitive Local Exchange Carrier (CLEC) serving 5490 access lines in rural Southeastern Montana. Range service area includes the Northern Cheyenne Indian Reservation and a portion of the Crow Reservation including the towns of Lame Deer and Busby, Montana. The counties included are Carter, Custer, Rosebud, Powder River, Treasure and Big Horn in Montana. Range is an active RUS borrower with loan funds due for completed projects and loan funds being requested for new projects and upgrades. Range will start a 5 yr RUS construction plan in 2010 to place buried fiber optic cable in various locations within Range’s service area to enhance existing broadband backhaul and provide future FTTH. 73% of Range’s serving area subscriber households and business locations are capable of 3mb service today. Approximately 52% of Range residential households in the applicants proposed funded service area already subscribe to 3 mb or 1.5 mb service today.

The applicant’s proposed funded service area that overlaps Range’s service area in Montana is not unserved or underserved as represented in the applicant’s proposal.

With respect to the Gray Holdings Corp Broadband application for broadband funds support in Montana recreation locations in the Custer National Forest, we already can provide 1.5 mb or more of DSL service to the households in the area designated by them. The area we serve is very rural but we still are trying to meet our customer’s broadband needs.

Range has been providing excellent communication services to this area for over 40 years. Range used RUS loan funds to build the infrastructure in this area to get customers communication service. Range is

a Cooperative that is owned by its members and they get the same high quality communication services. We are currently in the process of upgrading our backbone fiber with electronics that will further improve the broadband services in this area. We will utilize RUS loan funds from our recent application (not stimulus related) to eventually try to get our members/customers 100 mb of broadband in the next 4 to 5 years. We have fiber that goes right by this area already as well.

Range is very sensitive to its member/owner's needs and we have focused the majority of our efforts on improving broadband services to them. Gray Holdings Corp comments that much of the area that they applied for is unserved or underserved are not true in the case of our service area in the Custer National Forest recreation area. Range has 7 employees that work out of that area and already reside in or very near to that area and service those customers professionally.

-----**Service Area:** Nevada Recreation Locations

Submitter: Moapa Valley Telephone

Comment: Applicant is applying for funds for an area that is neither unserved or underserved. This application should be denied.

Submitter: CenturyLink

Comment: 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.

-----**Service Area:** Alaska Recreation Locations - Part 1

Submitter: Copper Valley Telephone Cooperative

Comment: Gray Holdings Corp's proposed last mile project covers 100% of the Valdez, Prince William Sound region and the Village of Tatitlek exchanges. These areas are currently served by Copper Valley Telephone Cooperative or our wholly-owned subsidiary, Copper Valley Wireless, through our existing fiber network and/or our fixed wireless services. In the public notice response Copper Valley Telephone Cooperative is providing; 1) a map of the overlapping area Copper Valley provides broadband services, 2) Copper Valley's DSL high speed internet advertising 3) the number of residential households and business establishments capable of receiving broadband services, 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.

-----**Service Area:** Colorado Recreation Locations

Submitter: US Cable of Coastal-Texas, L.P.

Comment: US Cable of Coastal-Texas, L.P. provides high speed broadband internet service in communities that are within the applicant's proposed service area.

Submitter: Blanca Telephone Company

Comment: Broadband service of at least 3 mbps in the subject grant area is already advertized and provisioned. Accordingly, the area is neither "underserved" nor "unserved" as defined by the NOFA. It

is uneconomic for stimulus money to be used to overbuild existing broadband services. The NOFA seeks irrelevant information, fails to apply the standard required by the ARRA, requires commenters to provide information without first publishing those requirements and procedures in the Federal Register, and awards stimulus grants based upon “presumptions” which are not found in the ARRA.

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 Gray Holdings Corp CO Rec Locs for funding for an area represented as “unserved” that is located, in whole or in part, in Qwest’s broadband service area.

Submitter: Nucla-Naturita Telephone Co.

Comment: Nucla-Naturita Telephone Company, d.b.a. NNTC Wireless, has been providing high-quality communication services to the remote and

mountainous areas of western Colorado for more than sixty years. We were among the first in the area to provide broadband

service. In 2003, NNTC’s customers could access the Internet at 640 kbps, a speed at the time that rivaled metropolitan areas.

NNTC continually stays atop off technological trends offering its customers ever-increasing speeds. In 2006, customers were

offered broadband service at speeds topping out at 3 Mbps.

NNTC operates in the Rocky Mountains and provides service to community anchor institutions including forest service offices

and wildfire stations. Due to the extreme terrain, some remote areas were unable to receive broadband services over wireline

facilities. In order to serve these residents and institutions, NNTC invested in wireless spectrum in 2005. Customers can

now access wireless broadband services including 3G EVDO wireless access. NNTC is a local company, proudly serving the

western slopes of the Rocky Mountains. It looks forward to the next 60 years, keeping this geographically remote area on

the technological cutting edge.

Submitter: Beulahland Communications, Inc.

Comment: Beulahland Communications, Inc., is a community based wireline provider of broadband services, that has been providing state-of-the-art telecommunication services to the rural portions of western Pueblo and southeastern Custer counties of southeast Colorado for over 50 years. Beulahland and its common controlled local telephone company employs 10 local people and is one of the largest employers in our community. Today, broadband speeds in excess of 768Kbs down and 512K up are available to 99% of customers in the service area mapped, including governmental and educational entities. The companies are presently in the process of a broadband network buildout that will provide broadband speeds in excess of 20Mbs by 2013 to all customers.

-----**Service Area:** Washington Recreation Locations

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 Gray Holdings Washington Rec 2 for funding for an area represented as “unserved” that is located, in whole or in part, in Qwest’s broadband service area.

-----**Service Area:** Arizona Recreation Locations - Part 2

Submitter: NPG Cable, Inc.

Comment: NPG Cable, Inc. currently provides sufficient broadband access and broadband services to end users and/or end user devices in the Service Area identified by the applicant below." These services provide data rates that far exceed the underserved requirements set forth by BTOP/NITA, in addition NPG's current wire solution scales to provide data rates that are unachievable through wireless solutions.

Submitter: TableTop Telephone Company

Comment: Table Top Telephone Company, Inc. believes the applicant for Broadband Stimulus Funding should be denied.

Submitter: CommSpeed, LLC

Comment: CommSpeed is a Wireless ISP and has been using BRS\EBS spectrum to deliver broadband services into Gray Holding Corp Recreation Part 2 proposed funded service area.

-----**Service Area:** Utah Recreation Locations

Submitter: South Central Utah Telephone Association

Comment: South Central Utah Telephone Association ("SCUTA") is a not for profit corporation that provides local telephone exchange, broadband, long distance, cable television and wireless PCS service in portions of Beaver, Garfield, Iron, Kane, Piute, Sevier, Washington and Wayne counties in south central Utah. In Arizona, SCUTA provides these services in the northern portion of Coconino and Mohave counties, north of the Grand Canyon. The Applicant's characterization of portions of the St. George BTA in Utah as being unserved and underserved is entirely without merit. In 2007, we engaged an independent market research firm to determine, among other things, broadband adoption rates in the St. George, Utah BTA, which includes all of Beaver, Garfield, Iron, Kane and Washington counties. It was determined with a 95% Confidence Level and a Confidence Interval of +/- 5% that Broadband adoption in the St. George BTA was 56%. Clearly the area is neither unserved nor underserved.

Submitter: Altazip Inc

Comment: Coverage already exists in many of the Utah Recreation locations mapped. therefore not under served.

Submitter: Strata Networks

Comment: It appears the application intends to use unlicensed spectrum for the proposed service. The use of the spectrum for the recreational areas is unreasonable due to the fact that those residents and potential businesses will want voice and broadband. Wireless technology using licensed spectrum such as cellular technology is a superior technology and has greater potential for broadband speeds with the LTE technology that is now being released.

The population referenced in the application is unsubstantiated. The unserved area in the application does not list communities. The area is mostly unpopulated and therefore the data referring to households, business, residents, and businesses cannot be correct. Certainly the data cannot be substantiated due to the lack of communities listed.

Some of the area around Daniel Summit and the Strawberry area along Highway 40 is currently served with Broadband.

Submitter: All West Communications

Comment: All West Communications provides broadband DSL and Ethernet services to locations within Wasatch County Utah and Summit County. These locations include Woodland and Weber canyon.

Submitter: Txox Communications L.L.C.

Comment: The coverage area that applicant has selected is covered by 2 or more Internet Service Providers that offer 3Mbps download or greater. Applicant has reversed their homes and business numbers in application as well. This application was done in such a hurry that errors such as the reversal of numbers and the lack of research on applicants part, that the coverage area that they claim is unserved is truly served to 90%. This should tell you that this applicant will not value the Grant money as well. Evidence of that fact is attached.

-----**Service Area:** New Mexico Recreation Locations

Submitter: Penasco Valley Telephone Cooperative Inc.

Comment: Penasco Valley Telephone Cooperative Inc. is providing an upload document that shows our internet speeds along with pricing. By viewing the NM Recreations Locations map you will notice that our ILEC area shaded in purple is the area that is served with high speed internet service. We can currently provide ADSL2+ internet to over 90% of the households in this area. The majority of our facilities are provided with the help of RUS loans and would require additional and redundant spending to fund this project.

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."

Submitter: Western New Mexico Telephone Company, Inc.

Comment: Respondent identifies locations within the Applicant's service area that are not un-served or underserved.

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 Gray Holdings Corp, Recreation Area 2 for funding for an area represented as "unserved" that is located, in whole or in part, in Qwest's broadband service area.

Submitter: Tularosa Basin Telephone Company

Comment: The Respondent has made major capital expenditures to enable the delivery of broadband services throughout its service area, which encompasses 100% of the Applicant's proposed service area. Within the Applicant's proposed funded Service Area the Respondent is capable of providing broadband services to 100% of its customers and advertises that capability. 99% of Respondents customers are capable of receiving download speeds of at least 1.5 Mbps and 98% are capable of receiving download speeds of at least 6.0 Mbps.

Submitter: PVT NetWorks, Inc.

Comment: PVT NetWorks, Inc. is currently serving the area shaded in purple with high speed internet. We are currently offering high speed internet with cable modem service. PVT NetWorks, Inc. is offering packages up to 3.0 MHz .PVT NetWorks, Inc. leases excess capacity from Peñasco Valley Telephone Cooperative Inc. facilities for backhaul and transport. These facilities were initially provided through RUS loans. The proposed project would require additional and redundant federal spending. Excess capacity may be leased from Peñasco Valley Telephone Cooperative Inc. as a much more financially prudent alternative to duplicate federal funding.

-----**Service Area:** Idaho Recreation Locations

Submitter: Silver Star Telephone Company, Inc.

Comment: Silver Star Telephone Company, Inc. dba Silver Star Communications has served the rural communities of Star Valley, Wyoming and surrounding areas for over 60 years. Silver Star is a leader in providing broadband services to rural America, offering High Speed Internet Services ranging from 256k/128k to 20M/5M within its service territory. Currently, Silver Star offers broadband services with speeds exceeding 768k downstream to over 95% of its service territory. Silver Star strives to offer the latest broadband technologies via its robust fiber and copper infrastructure and via its wireless facilities. Silver Star's broadband services enable its customers, residential and commercial, to connect to the world quickly and reliably in order to access information, entertainment, and commerce. Silver Star is constantly improving its facilities and upgrading its service offerings, while maintaining the delicate balance between affordability and value. Silver Star's investment in its facilities reaches beyond merely providing broadband services to its customers. Silver Star is considered a premier employer in the area and employs over 60 local residents. Silver Star is committed to enhancing rural residents' quality of life. Evidence of that commitment can be seen in Silver Star's community service projects, scholarship program and sustainability initiatives.

Submitter: Custer Telephone Cooperative, Inc.

Comment: Custer Telephone Cooperative, Inc. has provided Broadband service in the identified map area for the past several years. We currently provide Broadband service with the following technologies: Fiber to the node (DSL), Fiber to the Home (FTTH), DOCSIS Cable modem service, and Non-licensed wireless service.

Our primary capital funding source to invest in the latest broadband technology is the United States Department of Agriculture's RUS (Rural Utility Service) program.

The other broadband providers that we compete with in areas we serve are Verizon Wireless, Alltel Wireless, AT&T Wireless, CenturyTel, and Wild Blue Satellite.

We respectfully request Grays Holdings Corp's application be denied for the following reasons: (1) Affordable Broadband service is being provided through funding from USDA's RUS program, (2)

Competition currently exists in the area, (3) The applicant failed to adequately research the area for existing providers and therefore provided incorrect or untrue information in their application.

Submitter: Columbine Telephone Company, Inc.

Comment: Columbine Telephone Company, Inc. dba Silver Star Communications (Silver Star) has served the Teton Valley, ID community for over ten years, following its purchase of the service area from a large telecom carrier. Since that time, Silver Star has continued to be a leader in providing broadband service to rural America. Silver Star offers Broadband Services with speeds exceeding 768k downstream to over 95% of its service territory, with High Speed Internet Services ranging from 256k/128k to 20M/5M. Silver Star strives to offer the latest broadband technologies via its robust fiber and copper infrastructure and via its wireless facilities. Silver Star's broadband services enable its customers, residential and commercial, to connect to the world quickly and reliably in order to access information, entertainment, and commerce. Silver Star is constantly improving its facilities and upgrading its service offerings, while maintaining the delicate balance between affordability and value. Silver Star's investment in its facilities reaches beyond merely providing broadband services to its customers. Silver Star is committed to enhancing rural residents' quality of life, through employing local residents, participating in company-sponsored community service projects, its scholarship program, and its sustainability initiatives.

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 Gray Holdings Corp for funding for an area represented as "unserved" that is located, in whole or in part, in Qwest's broadband service area.

-----**Service Area:** California Recreation Locations

Submitter: Foresthill Telephone Company, dba Sebastian

Comment: Foresthill Telephone, dba, Sebastian, is challenging the applications for ARRA funding for the Foresthill Telephone exchange. The Foresthill telephone exchange exceeds the federal NTIA/RUS unserved and underserved definition. Audeamus, a non-regulated affiliate of Sebastian launched high-

speed Internet service back in 2005 consistent with the acquisition of this exchange. Sebastian is currently offering the choice of 6 Mbps, 2.5 Mbps, and 1.5 Mbps to its customers. The Foresthill Telephone exchange has a broadband penetration rate estimated at 58% and growing. As stated in the NOFA ARRA grants are designed to fund areas where no broadband connectivity exists (i.e. are either unserved or underserved). This is not the case in the Foresthill exchange. Applicants also fail in the requirement to demonstrate that service would not exist absent support from the grant funds – services already exist in this area. As the area served by Sebastian does not meet the required criteria, the request for funding in our service territory for this application should be denied.

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 application of Gray Holdings Corp. (“Applicant”) for last mile funding because Applicant’s proposed funded service area does not meet the requirement set forth in the Notice of Funds Availability to qualify as an “Underserved Area”. The current aggregate broadband penetration in Applicant’s proposed funded service area is significantly greater than the 40% standard set forth in the NOFA. Additionally, in the portion of Applicant’s proposed service area that is served by Wave more than 50% of the households have access to facilities-based, terrestrial broadband service. Essentially 100% of the households in the areas Wave serves in the proposed funded service area have access to Wave’s broadband services. Accordingly, NTIA and/or RUS must deny Applicant’s funding proposal.

Submitter: Sierra Telephone Company, Inc.

Comment: Public Response:

Sierra Telephone Company, Inc. and its affiliates (collectively "Sierra Telephone") hereby challenges this application for American Recovery and Reinvestment Act ("ARRA") funding in Sierra Telephone’s service territory. Sierra Telephone provides Broadband services over a Digital Subscriber Line platform in its service territory, in a manner that exceeds the federal National Telecommunications and Information Administration ("NTIA") and Rural Utilities Service ("RUS") unserved and underserved definitions. The area for which ARRA funding is sought in this application overlaps with the area that Sierra Telephone serves with broadband, and to the extent of such overlap, the application must be denied.

Sierra Telephone's service territory is neither "unserved" nor "underserved." As defined in the Notice of Funds Availability ("NOFA"), an area is classified as unserved if 90% of households lack access to broadband services. The percentage of households that lack access to broadband services at the minimum broadband transmission speeds in Sierra Telephone’s service territory that overlap the applicant’s proposed unserved area is well below the 90% threshold.

As defined in the NOFA, an area is classified as underserved if one of the following criteria are met: (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 of 768 kbps downstream and 200 kbps upstream; (2) no fixed or mobile broadband service provider advertises broadband transmission speeds of at least three megabits per second downstream in the proposed funded service area; or (3) the rate of broadband subscribership in the proposed funded service area is 40% or less. None of these standards for defining an underserved area can be met as to the portion of the proposed funded area that overlaps with Sierra Telephone's service territory. The rate of broadband subscribership for households in Sierra Telephone's service territory that overlap the applicant's proposed underserved area is well above the 40% threshold. Further, Sierra Telephone provides facilities-based, terrestrial broadband service to more than 50% of the households in its service territory. Sierra Telephone does not have information in its possession regarding the advertised speeds for any fixed or mobile broadband offerings in the proposed funded service area. However, Sierra Telephone understands that a satellite-based Internet Service Provider, HughesNet, offers broadband speeds of 3mbps or greater.

As stated in the NOFA, ARRA grants are designed to fund areas where insufficient broadband connectivity exists (i.e. it is designed to target areas that are either unserved or underserved). This is not the case in Sierra Telephone's service territory. In addition to the applicant's failure to meet the proper definitions of unserved and underserved relative to the proposed funded service area, the applicant also has demonstrated that service would not exist absent support from the grant funds. As described herein, services already exist in this area, including those provided by Sierra Telephone. Broadband is widely available in the area, and subscribership exceeds the 40% threshold. Since the portion of the proposed funding area that overlaps Sierra Telephone's service territory does not meet the required criteria, the request for funding in Sierra Telephone's service territory for this applicant must be denied.

Submitter: Ponderosa Cablevision

Comment: Ponderosa has demonstrated that the service area submitted has sufficient subscribership, better than federally mandated broadband speeds and pricing equivalent to less rural areas.

Submitter: Suddenlink Communications

Comment: This response conclusively demonstrates that Suddenlink and its competitors already offer robust broadband service within the mapped area of the applicant's proposed funded service area and that this mapped area is neither unserved nor underserved. Additional information is provided in the uploaded document, including (1) sample marketing material; (2) a guide on how to read the data we entered in the "Existing Broadband Subscribers" section of this response; (3) a summary of the vendor

and methodology used for estimating competitive-service subscribers in the mapped area; (4) Suddenlink contact information, should one or more federal agencies have questions or require additional information; and (5) a summary of concerns with the response process and the limitations that process has placed on our ability to provide NTIA/RUS with relevant, timely data.

Submitter: Pinnacles Telephone Co.

Comment: Pinnacles Telephone Co. is currently capable of providing Broadband service (DSL) to most residents of southern San Benito County in and around the rural communities of Paicines, San Benito and Idria. Pinnacles National Monument is also within our service area.

-----**Service Area:** Wyoming Recreation Locations

Submitter: DigitalBridge Communications Corp.

Comment: DigitalBridge Communications (“DBC”) currently offers true 4G, WiMAX broadband service in the applicant’s PFSA, serving an active base of residential and business subscribers in the PFSA. Other companies also serve the PFSA - DBC actively competes with cable (Bresnan) and DSL (Qwest) broadband providers in the PFSA. DBC estimates 50% overlap of its coverage with this segment of the PFSA based on households served.

Submitter: Silver Star Telephone Company, Inc.

Comment: Silver Star Telephone Company, Inc. dba Silver Star Communications has served the rural communities of Star Valley, Wyoming and surrounding areas for over 60 years. Silver Star is a leader in providing broadband services to rural America, offering High Speed Internet Services ranging from 256k/128k to 20M/5M within its service territory. Currently, Silver Star offers broadband services with speeds exceeding 768k downstream to over 95% of its service territory. Silver Star strives to offer the latest broadband technologies via its robust fiber and copper infrastructure and via its wireless facilities. Silver Star’s broadband services enable its customers, residential and commercial, to connect to the world quickly and reliably in order to access information, entertainment, and commerce. Silver Star is constantly improving its facilities and upgrading its service offerings, while maintaining the delicate balance between affordability and value. Silver Star’s investment in its facilities reaches beyond merely providing broadband services to its customers. Silver Star is considered a premier employer in the area and employs over 60 local residents. Silver Star is committed to enhancing rural residents’ quality of

life. Evidence of that commitment can be seen in Silver Star's community service projects, scholarship program and sustainability initiatives.

Submitter: Dubois Telephone Exchange, Inc.

Comment: Dubois Telephone Exchange, Inc. (DTE) is an Independent Local Exchange Carrier (ILEC) serving 2,500 access lines in rural northwest and south-central WY, including the Fremont County communities of Dubois and Crowheart; and the Carbon County communities of Baggs, Dixon and Savery. DTE is an active RUS borrower, currently engaged in an extensive FTTH upgrade throughout its serving areas. 90-95% of DTE serving area subscriber households and business locations are capable of 3mb DSL service today. Approximately 49% of DTE residential households in the applicant's proposed funded service area already subscribe to 3mb or 1.5 mb service today. Additionally, four developed campgrounds in the Wind River District of the Shoshone National Forest are capable of 3mb service. Beginning in 2010, DSL speeds of 10mb or faster will be available to FTTH households and businesses. The applicant's proposed funded service area that overlaps DTE's service area (including federally designated wilderness that precludes development of any type) in Fremont County and Carbon County, Wyoming is not unserved as represented in the applicant's proposal.

Submitter: Range Telephone Cooperative

Comment: Range Telephone Cooperative, Inc. (Range) is an Independent Local Exchange Carrier (ILEC) serving 2235 access lines in rural Northeastern Wyoming. Range service area includes Johnson, Crook, Weston, Campbell and Sheridan Counties. Range is an active RUS borrower with loan funds due for completed projects and loan funds being requested for new projects and upgrades. Range will start a 5 yr RUS construction plan in 2010 to place buried fiber optic cable in various locations within Range's service area to enhance existing broadband backhaul and provide future FTTH. 73% of Range's serving area subscriber households and business locations are capable of 3mb service today. Approximately 40% of Range residential households in the applicants proposed funded service area already subscribe to 3 mb or 1.5 mb service today.

The applicant's proposed funded service area that overlaps Range's service area in Wyoming is not unserved or underserved as represented in the applicant's proposal.

With respect to Gray Holdings Corp.'s application for broadband funds support in Wyoming, their comments that the areas are unserved or underserved are not true. The areas Range serves that were applied for in their application in the recreation areas are capable of 1.5 mb or higher broadband service

to the households that we serve. The area we serve is very rural but we still are trying to meet our customer's broadband needs.

Range has been providing excellent communication services to this area for over 40 years. Range used RUS loan funds to build the infrastructure in this area to get customers communication service. Range is a Cooperative that is owned by its members and they get the same high quality communication services. We are currently in the process of upgrading our backbone fiber with electronics that will further improve the broadband services in this area. We will utilize RUS loan funds from our recent application (not stimulus related) to eventually try to get our members/customers 100 mb of broadband in the next 4 to 5 years.

Range is very sensitive to its member/owner's needs and we have focused the majority of our efforts on improving broadband services to them. Gray Holding Corp.'s comments that much of the area that they applied for is unserved or underserved are not true in the case of our service area in Wyoming. Range has 4 employees that already reside in the state and service those customers professionally. Our rates are very affordable and competitive.

-----**Service Area:** Oregon Recreation Locations

Submitter: Oregon Telephone Corporation

Comment: Respondent provides broadband services to a portion of the Applicant's overlapping proposed funded service area indicated on the attached map.

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 Gray Holdings Corp for funding for an area represented as "unserved" that is located, in whole or in part, in Qwest's broadband service area.

