

## Broadband USA Applications Database

**Applicant Name:** State of Tennessee

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### Public Notice Submissions

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-----**Service Area:** TN-Carroll

**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.

-----**Service Area:** TN-Benton

**Submitter:** TDS Telecom

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

-----**Service Area:** TN-Morgan

**Submitter:** Highland Telephone Cooperative, Inc.

**Comment:** Highland Telephone Cooperative's data clearly demonstrate that the proposed funded service area does not qualify as an underserved area. HTC offers facilities-based, terrestrial broadband service to households in the entire proposed Morgan county service area. Any of these households may subscribe to broadband service if they so choose. HTC contends that downstream broadband speeds of three Mbps are advertised, more than 50 percent of households have access to service, and subscribership rates are higher than 40 percent as defined in the Notice of Funds Availability quoted below.

An “underserved area” is defined as: “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.

In conclusion, the Morgan County service area does not meet any of the definitions or criteria for an "underserved area". Simply stated, Highland Telephone Cooperative currently provides the defined broadband access to all households in the Morgan County service area.

Therefore, no other organizations should receive funds to provide broadband service in an area which is not "underserved".

F. L. Terry,  
General Manager

-----**Service Area:** TN-Sequatchie

**Submitter:** Bledsoe Telephone Cooperative Corporation

**Comment:** There are a few small areas within the Bledsoe Telephone Cooperative territory where broadband at 768/256 kbps is not available. These areas are un-served. The remaining territory is provided with broadband at 768/256 kbps or greater. Due to low take rate the remaining territory is considered underserved.

-----**Service Area:** TN-McMinn

**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.

-----**Service Area:** TN-Marshall

**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.

-----**Service Area:** TN-VanBuren

**Submitter:** Ben Lomand Communications, LLC

**Comment:** Ben Lomand Telephone Cooperative, Inc., and Ben Lomand Communications, LLC, (Ben Lomand) offer middle mile services to connect the communities of McMinnville, Sparta, Spencer, Tracy City, Laager, Monteagle, Beersheba, Pelham, Hillsboro, Viola, Rock Island, Dibrell, Doyle, Old Zion, and BonDeCroft in the State of Tennessee. They have multiple transport networks to connect these communities, including Ethernet and Sonet transport systems that offer a capacity of up to 10 Gigabits. These communities are served with a diversely routed fiber optic cable system that provides high reliability and resiliency from a potential fiber optic cable cut. Their existing fiber optic cable infrastructure and transport network electronics provide adequate transport facilities to serve all the needs of these communities today and into the future. Based on the factors included in this response, RUS/NTIA must reject the State of Tennessee's TN-VanBuren application. The public interest goals suggested to be furthered by the proposed project are being accomplished using existing "middle-mile" infrastructure, which is thereby more efficient and will avoid the potential destabilizing effect of subsidized competition. These locations cannot be considered either "underserved" or "unserved". The middle mile and last mile infrastructure deployed by Ben Lomand and its affiliated companies currently provide (and will continue to provide) highly reliable, state-of-the-art services to the businesses and residents of these communities.

-----**Service Area:** TN-Coffee

**Submitter:** Ben Lomand Communications, LLC

**Comment:** Ben Lomand Telephone Cooperative, Inc., and Ben Lomand Communications, LLC, (Ben Lomand) offer middle mile services to connect the communities of McMinnville, Sparta, Spencer, Tracy City, Laager, Monteagle, Beersheba, Pelham, Hillsboro, Viola, Rock Island, Dibrell, Doyle, Old Zion, and BonDeCroft in the State of Tennessee. They have multiple transport networks to connect these communities, including Ethernet and Sonet transport systems that offer a capacity of up to 10 Gigabits. These communities are served with a diversely routed fiber optic cable system that provides high reliability and resiliency from a potential fiber optic cable cut. Their existing fiber optic cable infrastructure and transport network electronics provide adequate transport facilities to serve all the needs of these communities today and into the future. Based on the factors included in this response, RUS/NTIA must reject the State of Tennessee's TN-Coffee application. The public interest goals suggested to be furthered by the proposed project are being accomplished using existing "middle-mile" infrastructure, which is thereby more efficient and will avoid the potential destabilizing effect of subsidized competition. These locations cannot be considered either "underserved" or "unserved". The middle mile and last mile infrastructure deployed by Ben Lomand and its affiliated companies currently provide (and will continue to provide) highly reliable, state-of-the-art services to the businesses and residents of these communities.

-----**Service Area:** TN-Lawrence

**Submitter:** Loretto Telephone Company Inc.

**Comment:** The Loretto Telephone Company map overlay is in response to the Broadband Stimulus applications that have been filed, and include our current broadband service areas.

The Stimulus money that this applicant has applied for is clearly marked on the current ConnectedTennessee.org website as currently SERVED areas.

Loretto Telephone Company has provided Broadband service to 99.6% of the customers within our serving area with up to 6 Mbps of DSL bandwidth. Loretto Telephone Company has been providing Broadband services in these areas since March, 1998.

Loretto Telephone Company currently a RUS borrower since 1954, challenges the need to provide tax dollars to an area that is already being adequately served with Broadband Internet services.

The uploaded document provides proof that we advertise these services.

**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.

**Submitter:** Loretto Telephone Company, Inc.

**Comment:** The Loretto Telephone Company map overlay is in response to the Broadband Stimulus applications that have been filed, and include our current broadband service areas.

The Stimulus money that this applicant has applied for is clearly marked on the current ConnectedTennessee.org website as currently SERVED areas.

Loretto Telephone Company has provided Broadband service to 99.6% of the customers within our serving area with up to 6 Mbps of DSL bandwidth. Loretto Telephone Company has been providing Broadband services in these areas since March, 1998.

Loretto Telephone Company currently a RUS borrower since 1954, challenges the need to provide tax dollars to an area that is already being adequately served with Broadband Internet services.

The uploaded document provides proof that we advertise these services.

-----**Service Area:** TN-Henderson

**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.

-----**Service Area:** TN-Giles

**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.

-----**Service Area:** TN-Scott

**Submitter:** Highland Telephone Cooperative, Inc.

**Comment:** Highland Telephone Cooperative's data clearly demonstrate that the proposed funded service area does not qualify as an underserved area. HTC offers facilities-based, terrestrial broadband service to households in the entire proposed Scott county service area. Any of these households may subscribe to broadband service if they so choose. HTC contends that more than 50 percent of households have access to service, downstream broadband speeds of three mbps are advertised, and subscribership rates are higher than 40 percent as defined in the Notice of Funds Availability quoted below.

An "underserved area" is defined as: "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.

In conclusion, the Scott County service area does not meet any of the definitions or criteria for an "underserved area". Simply stated, Highland Telephone Cooperative currently provides the defined broadband access to all households in the Scott County service area.

Therefore, no other organizations should receive funds to provide broadband service in an area which is not "underserved".

F. L. Terry,

General Manager

-----**Service Area:** TN-Marion

**Submitter:** Ben Lomand Communications, LLC

**Comment:** Ben Lomand Telephone Cooperative, Inc., and Ben Lomand Communications, LLC, (Ben Lomand) offer middle mile services to connect the communities of McMinnville, Sparta, Spencer, Tracy City, Laager, Monteagle, Beersheba, Pelham, Hillsboro, Viola, Rock Island, Dibrell, Doyle, Old Zion, and BonDeCroft in the State of Tennessee. They have multiple transport networks to connect these communities, including Ethernet and Sonet transport systems that offer a capacity of up to 10 Gigabits. These communities are served with a diversely routed fiber optic cable system that provides high reliability and resiliency from a potential fiber optic cable cut. Their existing fiber optic cable infrastructure and transport network electronics provide adequate transport facilities to serve all the needs of these communities today and into the future. Based on the factors included in this response, RUS/NTIA must reject the State of Tennessee’s TN-Marion application. The public interest goals suggested to be furthered by the proposed project are being accomplished using existing “middle-mile”

infrastructure, which is thereby more efficient and will avoid the potential destabilizing effect of subsidized competition. These locations cannot be considered either “underserved” or “unserved”. The middle mile and last mile infrastructure deployed by Ben Lomand and its affiliated companies currently provide (and will continue to provide) highly reliable, state-of-the-art services to the businesses and residents of these communities.

-----**Service Area:** TN-Claiborne

**Submitter:** James Cable LLC

**Comment:** James Cable LLC provides 8Mb broadband service to the communities of Tazewell, New Tazewell and Harrogate in Claiborne county, Tennessee.

-----**Service Area:** TN-Monroe

**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.

-----**Service Area:** TN-Bledsoe

**Submitter:** Bledsoe Telephone Cooperative Corporation

**Comment:** There are a few small areas within the Bledsoe Telephone Cooperative territory where broadband at 768/256 kbps is not available. These areas are un-served. The remaining territory is provided with broadband at 768/256 kbps or greater. Due to low take rate the remaining territory is considered underserved.

**Submitter:** Bledsoe Telephone Cooperative corporation

**Comment:** Bledsoe Telephone Cooperative Corporation (Bledsoe) is a RUS Borrower and the Incumbent Local Exchange Carrier (ILEC) for all of Bledsoe County. Except for the College Station and Nine Mile Exchanges, the remainder of the county residences and businesses have Broadband Services with speeds up to 6mbps/768kbps available to them. The Nine Mile and College Station exchange areas have some broadband services available but are considered underserved.

-----**Service Area:** TN-Putnam

**Submitter:** Citizens Telecommunications Company of Tennessee

**Comment:** A portion of the applicant's territory is already served by the respondent. 3MG speed or higher is available and advertised.

-----**Service Area:** TN-Humphreys

**Submitter:** TDS Telecom

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

-----**Service Area:** TN-Wayne

**Submitter:** TDS Telecom

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

