

Broadband USA Applications Database

Applicant Name: Iowa Health System, Inc.

Public Notice Submissions

-----**Service Area:** Ottumwa

Submitter: IOWA NETWORK SERVICES, INC.

Comment: Comments on the Iowa Health System Broadband Extension Project

Application name: Iowa Health Systems, Inc.

Project Title: Iowa Health System Broadband Extension Project

Project Type: Middle Mile

Comments by Iowa Network Services, Inc.

Iowa Health System, Inc. (IHS) seeks over \$19 million to build a fiber network that would essentially overlay existing fiber networks that are already established, in-service, and operated by Iowa Network Services and other providers.

IHS states in its application that "Achieving the health care goals of this Administration will require healthcare providers to have access to broadband capacity that is not available now in the healthcare sector."

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The 18 cities listed for expansion in the IHS application are not unserved or underserved communities. These cities are the major metropolitan areas in the state. Of the 18 cities listed, 15 are currently connected with fiber optic facilities by Iowa Network Services and other common carriers. The remaining three urban communities lie within thirty miles of Iowa Network Services' infrastructure and also are served with fiber facilities by other carriers. There is a competitive broadband backbone and middle mile service in all of the 18 cities listed in the IHS application.

In 1984, Iowa Network Services was conceived to provide state-of-the-art telecommunications services to rural Iowa and has successfully done so over the past two decades. Iowa Network Services has been critical to the delivery of competitive long distance telephone services since the late 1980's, Internet access in the early 1990's, and Internet protocol television today.

Both Iowa Network Services and IHS are non-governmental, privately-owned systems. The INS Network was initially intended for use by 150 locally owned independent telephone companies in rural communities throughout the state of Iowa.

Today that use has expanded. INS continues to provide connectivity services to the independents in addition to providing full network access to other entities including major land line interexchange carriers, regional and national wireless carriers, and private businesses requiring high capacity fiber, broadband services and more. The INS Network is available to any customer and would welcome the opportunity to work with health care providers. Part of the INS mission is to provide opportunity for its customers. This mission drives INS to always strive to develop the network its customers need.

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IHS cites the following goals in its application:

- “Access to broadband capacity that is not available now”
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Both of these goals can be met today without additional funding or build out. Broadband capacity is available to IHS by multiple, competitive carriers in the 18 slated cities and throughout the state. In addition, the application request is not for last mile access. To address the last mile need, government should look to support providers such as Iowa Network Services and others that have the ability to provide last mile access.

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We oppose the Iowa Health application because:

- the taxes we pay would help pay for their network
- it generates redundant competition
- it adds unnecessary infrastructure in the ground
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Submitter: Qwest

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-----**Service Area:** Sioux City

Submitter: SiouxLan Communications

Comment: SiouxLan Communications provides Broadband Internet to the service area indicated and has been a provider within this territory for the past 5 years. We have continued success with the packages and bundling that we offer and are able to meet the demands of our customer base by providing a feature rich and redundant system.

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Submitter: Qwest

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-----**Service Area:** Iowa City

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Submitter: South Slope Cooperative Telephone Company

Comment: South Slope Cooperative Telephone Company (South Slope) demonstrates that it provides broadband service throughout the entire area encompassed in the proposed funded Service Area in the Iowa Health System Inc. application; that no interconnection point identified in the proposed project and no part of the proposed project terminates in a proposed funded Service Area that qualifies as unserved or underserved for Last Mile projects; and all of the Last Mile areas to be served identified in the application are served with broadband service by South Slope. Further, South Slope demonstrates that in addition to providing its own last mile broadband services, South Slope has middle mile broadband facilities providing sufficient capacity to support the provision of broadband service to end users.

As demonstrated, 100% of households in the proposed funded Service Area, including the identified interconnection points, are able to readily subscribe upon request to facilities-based, terrestrial broadband services at a minimum transmission speed of greater than 768 kbps downstream and 200 kbps upstream from South Slope; 100% of the households in the proposed funded Service Area, including the identified interconnection points, have access to facilities-based, terrestrial broadband service at greater than the minimum broadband transmission speed as set forth in the definition of broadband; South Slope advertises broadband service at broadband transmission speeds of at least 3 megabits per second downstream throughout the proposed funded Service Area, including the identified interconnection points; and the rate of broadband subscribership for the proposed funded Service Area, including the identified interconnection points, is greater than 40 percent of households.

Submitter: Qwest

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-----**Service Area:** Bettendorf

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The 18 cities listed for expansion in the IHS application are not unserved or underserved communities. These cities are the major metropolitan areas in the state. Of the 18 cities listed, 15 are currently connected with fiber optic facilities by Iowa Network Services and other common carriers. The remaining three urban communities lie within thirty miles of Iowa Network Services’ infrastructure and also are served with fiber facilities by other carriers. There is a competitive broadband backbone and middle mile service in all of the 18 cities listed in the IHS application.

In 1984, Iowa Network Services was conceived to provide state-of-the-art telecommunications services to rural Iowa and has successfully done so over the past two decades. Iowa Network Services has been critical to the delivery of competitive long distance telephone services since the late 1980's, Internet access in the early 1990's, and Internet protocol television today.

Both Iowa Network Services and IHS are non-governmental, privately-owned systems. The INS Network was initially intended for use by 150 locally owned independent telephone companies in rural communities throughout the state of Iowa.

Today that use has expanded. INS continues to provide connectivity services to the independents in addition to providing full network access to other entities including major land line interexchange carriers, regional and national wireless carriers, and private businesses requiring high capacity fiber, broadband services and more. The INS Network is available to any customer and would welcome the opportunity to work with health care providers. Part of the INS mission is to provide opportunity for its customers. This mission drives INS to always strive to develop the network its customers need.

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Both of these goals can be met today without additional funding or build out. Broadband capacity is available to IHS by multiple, competitive carriers in the 18 slated cities and throughout the state. In addition, the application request is not for last mile access. To address the last mile need, government should look to support providers such as Iowa Network Services and others that have the ability to provide last mile access.

In closing, Iowa Health Systems, Inc. has already received \$7.8 million from the FCC’s Universal Service Fund (a fund sustained by the customers of the private networks with which IHS seeks to compete). To further invest public dollars by awarding this application would jeopardize current providers who successfully provide broadband within Iowa.

We oppose the Iowa Health application because:

- the taxes we pay would help pay for their network
- it generates redundant competition
- it adds unnecessary infrastructure in the ground
- overbuilding in metropolitan areas does not fulfill the need for broadband expansion in rural areas
- stagnant and/or decreasing revenues due to competition would make it difficult for existing providers to provide broadband services in areas that are expensive and difficult to serve

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 Iowa Health System, Inc., Debuque 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.

-----**Service Area:** Muscatine

Submitter: IOWA NETWORK SERVICES, INC.

Comment: Comments on the Iowa Health System Broadband Extension Project

Application name: Iowa Health Systems, Inc.

Project Title: Iowa Health System Broadband Extension Project

Project Type: Middle Mile

Comments by Iowa Network Services, Inc.

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Submitter: Muscatine Power & Water

Comment: Muscatine Power & Water currently offers a diverse set of broadband services in the proposed funded Service Area that satisfy transmission requirements. Further, MP&W's broadband services are available to all residential & commercial users within the proposed funded Service Area. Therefore, the proposed funded Service Area can not be defined as "underserved" per NFOA definition.

-----**Service Area:** Ames

Submitter: Huxley Communications Cooperative

Comment: The information contained in this response proves that customers within our service territory, which overlaps the applicant's proposed service area, have access to quality, facilities-based broadband service as defined by the RUS/NTIA Notice of Funds Availability (NOFA).

Submitter: IOWA NETWORK SERVICES, INC

Comment: Comments on the Iowa Health System Broadband Extension Project

Application name: Iowa Health Systems, Inc.

Project Title: Iowa Health System Broadband Extension Project

Project Type: Middle Mile

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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 Iowa Health System, Inc. 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.

-----**Service Area:** Waterloo

Submitter: IOWA NETWORK SERVICES, INC.

Comment: Comments on the Iowa Health System Broadband Extension Project

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Project Title: Iowa Health System Broadband Extension Project

Project Type: Middle Mile

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Submitter: Farmers Mutual Telephone Company

Comment: Farmers Mutual Telephone Company is providing voice, data and video within our exchange borders, which is registered with the Iowa Utility Board. Farmers Mutual Telephone Co. is providing a broadband connection that exceeds the broadband standards set forth by the FCC. Our advertised broadband transmission speeds are advertised at www.jtt.net. We are providing this connection by using ADSL2+ technology and our entire exchange can be served by this technology.

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 Iowa Health System, Inc., Waterloo 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.

-----**Service Area:** Clinton

Submitter: IOWA NETWORK SERVICES, INC.

Comment: Comments on the Iowa Health System Broadband Extension Project

Application name: Iowa Health Systems, Inc.

Project Title: Iowa Health System Broadband Extension Project

Project Type: Middle Mile

Comments by Iowa Network Services, Inc.

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Submitter: Qwest

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-----**Service Area:** Cedar Falls

Submitter: IOWA NETWORK SERVICES, INC.

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Submitter: Qwest

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-----**Service Area:** Cedar Rapids

Submitter: South Slope Cooperative Telephone Company

Comment: South Slope Cooperative Telephone Company (South Slope) demonstrates that it provides broadband service throughout the entire area encompassed in the proposed funded Service Area in the Iowa Health System Inc. application; that no interconnection point identified in the proposed project and no part of the proposed project terminates in a proposed funded Service Area that qualifies as unserved or underserved for Last Mile projects; and all of the Last Mile areas to be served identified in the application are served with broadband service by South Slope. Further, South Slope demonstrates that in addition to providing its own last mile broadband services, South Slope has middle mile broadband facilities providing sufficient capacity to support the provision of broadband service to end users.

As demonstrated, 100% of households in the proposed funded Service Area, including the identified interconnection points, are able to readily subscribe upon request to facilities-based, terrestrial broadband services at a minimum transmission speed of greater than 768 kbps downstream and 200 kbps upstream from South Slope; 100% of the households in the proposed funded Service Area, including the identified interconnection points, have access to facilities-based, terrestrial broadband service at greater than the minimum broadband transmission speed as set forth in the definition of broadband; South Slope advertises broadband service at broadband transmission speeds of at least 3 megabits per second downstream throughout the proposed funded Service Area, including the identified interconnection points; and the rate of broadband subscribership for the proposed funded Service Area, including the identified interconnection points, is greater than 40 percent of households.

Submitter: Iowa Network Services, Inc.

Comment: Comments on the Iowa Health System Broadband Extension Project

Application name: Iowa Health Systems, Inc.

Project Title: Iowa Health System Broadband Extension Project

Project Type: Middle Mile

Comments by Iowa Network Services, Inc.

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The 18 cities listed for expansion in the IHS application are not unserved or underserved communities. These cities are the major metropolitan areas in the state. Of the 18 cities listed, 15 are currently connected with fiber optic facilities by Iowa Network Services and other common carriers. The remaining three urban communities lie within thirty miles of Iowa Network Services’ infrastructure and also are served with fiber facilities by other carriers. There is a competitive broadband backbone and middle mile service in all of the 18 cities listed in the IHS application.

In 1984, Iowa Network Services was conceived to provide state-of-the-art telecommunications services to rural Iowa and has successfully done so over the past two decades. Iowa Network Services has been critical to the delivery of competitive long distance telephone services since the late 1980's, Internet access in the early 1990's, and Internet protocol television today.

Both Iowa Network Services and IHS are non-governmental, privately-owned systems. The INS Network was initially intended for use by 150 locally owned independent telephone companies in rural communities throughout the state of Iowa.

Today that use has expanded. INS continues to provide connectivity services to the independents in addition to providing full network access to other entities including major land line interexchange carriers, regional and national wireless carriers, and private businesses requiring high capacity fiber, broadband services and more. The INS Network is available to any customer and would welcome the opportunity to work with health care providers. Part of the INS mission is to provide opportunity for its customers. This mission drives INS to always strive to develop the network its customers need.

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In reality, the IHS application seeks public funding to offer services where services and competitive options already exist. If public money is used to build out the IHS network, unfair competition will be created. When using public funds, the base line objective should be to provide the most good with the funds available.

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- “Access to broadband capacity that is not available now”
- “Enable last mile broadband access to homebound patients and support more effective primary, specialty, and preventive care”

Both of these goals can be met today without additional funding or build out. Broadband capacity is available to IHS by multiple, competitive carriers in the 18 slated cities and throughout the state. In addition, the application request is not for last mile access. To address the last mile need, government should look to support providers such as Iowa Network Services and others that have the ability to provide last mile access.

In closing, Iowa Health Systems, Inc. has already received \$7.8 million from the FCC’s Universal Service Fund (a fund sustained by the customers of the private networks with which IHS seeks to compete). To further invest public dollars by awarding this application would jeopardize current providers who successfully provide broadband within Iowa.

We oppose the Iowa Health application because:

- the taxes we pay would help pay for their network
- it generates redundant competition
- it adds unnecessary infrastructure in the ground
- overbuilding in metropolitan areas does not fulfill the need for broadband expansion in rural areas
- stagnant and/or decreasing revenues due to competition would make it difficult for existing providers to provide broadband services in areas that are expensive and difficult to serve

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 Iowa Health System, Inc., Cedar Rapids 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.

-----**Service Area:** Davenport

Submitter: IOWA NETWORK SERVICES, INC.

Comment: Comments on the Iowa Health System Broadband Extension Project

Application name: Iowa Health Systems, Inc.

Project Title: Iowa Health System Broadband Extension Project

Project Type: Middle Mile

Comments by Iowa Network Services, Inc.

Iowa Health System, Inc. (IHS) seeks over \$19 million to build a fiber network that would essentially overlay existing fiber networks that are already established, in-service, and operated by Iowa Network Services and other providers.

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-----**Service Area:** Fort Dodge

Submitter: IOWA NETWORK SERVICES, INC.

Comment: Comments on the Iowa Health System Broadband Extension Project

Application name: Iowa Health Systems, Inc.

Project Title: Iowa Health System Broadband Extension Project

Project Type: Middle Mile

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-----**Service Area:** West Des Moines

Submitter: IOWA NETWORK SERVICES, INC.

Comment: Comments on the Iowa Health System Broadband Extension Project

Application name: Iowa Health Systems, Inc.

Project Title: Iowa Health System Broadband Extension Project

Project Type: Middle Mile

Comments by Iowa Network Services, Inc.

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Submitter: Qwest

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-----**Service Area:** Burlington

Submitter: IOWA NETWORK SERVICES, INC.

Comment: Comments on the Iowa Health System Broadband Extension Project

Application name: Iowa Health Systems, Inc.

Project Title: Iowa Health System Broadband Extension Project

Project Type: Middle Mile

Comments by Iowa Network Services, Inc.

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-----**Service Area:** Marshalltown

Submitter: IOWA NETWORK SERVICES, INC.

Comment: Comments on the Iowa Health System Broadband Extension Project

Application name: Iowa Health Systems, Inc.

Project Title: Iowa Health System Broadband Extension Project

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Submitter: Qwest

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