

Broadband USA Applications Database

Applicant Name: KeyOn Communications, Inc.

Public Notice Submissions

-----**Service Area:** Oklahoma

Submitter: Cherokee Telephone

Comment: Cherokee Telephone Company (CTC) currently provides a wide array of broadband offerings within the proposed funded service area. CTC has been offering broadband services in excess of the bandwidth requirement as set forth in the ARRA, NOFA and BIP/BTOP guidelines, all prior to the ARRA approval. CTC's service area already provides for "sufficient access to broadband service to facilitate rural economic development", as well as allows for choice of service providers through competing with Competitive Local Exchange Carriers, and CTC's network allows for leasing of services through our own facilities. The proposed funded service area already provides for not only broadband service through CTC, but several CLEC's, Cable companies, and numerous mobile broadband service providers offer several choices to the subscriber. CTC's opinion of the proposed funded service area is that of unnecessary spending within areas where sufficient broadband offerings exist to meet current demands. Whereas the requested funding could be better utilized in other portions of the country to deploy, map, or support other broadband services in accordance with the ARRA, NOFA and BIP/BTOP programs. Through funding the proposed service area, excessive competition will be created for all, which may create a short term economic boost, but have severe long term ramifications which may force current stable and thriving service providers to close or consolidate business, leading to layoffs and resulting in another economic downturn.

Submitter: @Link Services LLC

Comment: @Link Services LLC is an Oklahoma LLC that has been providing broadband services in Central Oklahoma since 2005. @Link provides high speed internet service with speeds of up to 6Mbps by utilizing fixed wireless technology in both licensed and unlicensed frequencies. @Link provides service in forty four rural, Oklahoma communities and four urban areas in Central Oklahoma through a network of more than 60 tower sites.

The proposed funded service areas overlaps the @Link service area. The overlapping service area has been documented with the use of the mapping tool.

@Link has included copies of advertisements for service within the proposed funded service area.

@Link has determined, at the census block level, the number of residential households currently capable of receiving @Link service. @Link has determined the total number of business establishments within the zip codes included in the polygon. Totals have been provided as requested and supporting documents are available if requested.

@Link has determined, at the census block level, the number of residences and businesses currently subscribing to @Link services as well as the advertised download and upload speeds. Totals have been provided as requested and supporting documentation is available as is necessary.

Submitter: Rhino Communications

Comment: Rhino Communications (RC) currently provides a wide array of broadband offerings within the proposed funded service area. RC has been offering broadband services in excess of the bandwidth requirement as set forth in the ARRA, NOFA and BIP/BTOP guidelines, all prior to the ARRA approval. RC's service area already provides for "sufficient access to broadband service to facilitate rural economic development", as well as allows for choice of service providers through competing with Incumbent Local Exchange Carriers, and RC's network allows for leasing of services through our own facilities. The proposed funded service area already provides for not only broadband service through RC, but several CLEC's, Cable companies, and numerous mobile broadband service providers offer several choices to the subscriber. RC's opinion of the proposed funded service area is that of unnecessary spending within areas where sufficient broadband offerings exist to meet current demands. Whereas the requested funding could be better utilized in other portions of the country to deploy, map, or support other broadband services in accordance with the ARRA, NOFA and BIP/BTOP programs. Through funding the proposed service area, excessive competition will be created for all, which may create a short term economic boost, but have severe long term ramifications which may force current stable and thriving

service providers to close or consolidate business, leading to layoffs and resulting in another economic downturn.

Submitter: Broken Bow TV Cable

Comment: Broken Bow TV Cable has provided cable mode service to the idabel area since 2003

Submitter: Pine Telephone company

Comment: Pine Telephone has provided high-speed digital subscriber line service since 2001

Submitter: James Cable

Comment: James Cable provides 8Mb broadband service to the communities of Durant, Armstrong, Caddo, Calera, and Colbert in Oklahoma. We provide 3Mg service to Bochito and Achille.

Submitter: Dobson Telephone Company

Comment: Dobson Telephone Company challenges the application of KeyOn Communications, Inc. based on their declaration of the serving area being underserved.

Submitter: Carnegie Telephone Company

Comment: Carnegie Telephone Comapny provides DSL to 100% of the Carnegie and Alfalfa exchanges at speeds of at least 3mbps. The subscribership of the areas is greater than 40% of households.

Submitter: Wichita Online Inc.

Comment: Wichita Online (WOI) currently provides a wide array of broadband offerings within the proposed funded service area. WOI has offered broadband services in excess of the 3 MB bandwidth requirement as set forth in the ARRA, NOFA and BIP/BTOP guidelines, all prior to the ARRA approval. WOI's service area already provides for "sufficient access to broadband service to facilitate rural economic development", as well as allows for choice of service providers through competing with Local Exchange Carriers, and allows for leasing of services through our own facilities. The proposed funded service area already provides for not only broadband service through WOI, but several ILEC's, Cable companies, and numerous mobile broadband service providers offer several choice to the subscriber.

WOI's opinion of the proposed funded service area is that of excess spending where funds could be better used in other portions of the country to deploy broadband service in accordance with the ARRA, NOFA and BIP/BTOP programs. Through funding the proposed service area, excessive competition will be created for all, which may create a short term economic boost, but have severe long term ramifications which may force service providers out of business.

Submitter: KanOkla Networks

Comment: KanOkla Networks has been providing our customers the best in telecommunications/data technology for almost 60 years. We are the leader in our service areas for rolling out new and innovative services to our subscribers. We currently offer broadband service, at speeds up to 6 Mbps, to 100% of our current and potential customers. KanOkla is in the midst of installing Fiber To The Home (FTTH) to all of our exchange areas, bringing the capability of 100 Mbps to all homes and businesses throughout our areas. This project, with its wealth of bandwidth for our subscribers, will position our communities for the future.

Submitter: Windstream

Comment: Windstream's data strongly suggest that the proposed funded service area likely does not qualify as an underserved area. Windstream offers facilities-based, terrestrial broadband service (meeting the definition set forth in the Notice of Funds Availability) to some of the households in 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 underserved.

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 "underserved area" as follows: "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. A proposed funded service area may qualify as underserved for Middle Mile projects if one interconnection point terminates in a proposed funded service area that qualifies as unserved or underserved for Last Mile projects.”