

Broadband USA Applications Database

Applicant Name: Northwest Open Access Network

Public Notice Submissions

-----**Service Area:** NOANET-Randle

Submitter: CenturyLink

Comment: The proposed service areas are not wholly underserved or unserved.

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.

CenturyLink has committed to upgrade and extend broadband.

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lines by July 1, 2012. Consequently, virtually no areas served by CenturyTel or Embarq local operating companies, in any state, will be underserved or unserved at the end of three years.

CenturyLink also agreed to meet targets for minimum download speeds. CenturyLink will ensure availability of retail broadband Internet access service with a download speed of 1.5 Mbps to 87% of the broadband eligible access lines by July 1, 2011. It will ensure availability with a download speed of 3 Mbps to 75% of broadband eligible access lines by July 1, 2010, to 78% of broadband eligible lines by July 1, 2011, and to 80% of broadband eligible lines within 3 years of the close date. Nationwide, our average tele-density is 23 customers per square mile. This commitment ensures availability of broadband even to very rural consumers.

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-----**Service Area:** NOANET-Mossyrock

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: Comcast Cable

Comment: Attached is a summary of the Comcast Cable homes passed, subscriber and advertising information related to the service areas encompassed by this application.

-----**Service Area:** NOANET-Covington

Submitter: Comcast Cable

Comment: Attached is a summary of the Comcast Cable homes passed, subscriber and advertising information related to the service areas encompassed by this application.

-----**Service Area:** NOANET-Walla Walla

Submitter: Charter Communications

Comment: Charter Communications ('Charter'), a broadband service provider, has invested capital to provide a full range of Broadband services, including High Speed Internet services, in this service area. The applicant's request in the proposed under-served and un-served service area would create an overlap in Charter's service area. Charter's response includes the necessary information to validate the overlapping condition as a result of this applicant's request.

-----**Service Area:** NOANET-Stevenson

Submitter: CenturyLink

Comment: The proposed service areas are not wholly underserved or unserved.

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-----**Service Area:** NOANET-Dixie

Submitter: Charter Communications

Comment: Charter Communications ('Charter'), a broadband service provider, has invested capital to provide a full range of Broadband services, including High Speed Internet services, in this service area. The applicant's request in the proposed under-served and un-served service area would create an overlap in Charter's service area. Charter's response includes the necessary information to validate the overlapping condition as a result of this applicant's request.

-----**Service Area:** NOANET-Kamilche

Submitter: Comcast Cable

Comment: Attached is a summary of the Comcast Cable homes passed, subscriber and advertising information related to the service areas encompassed by this application.

-----**Service Area:** NOANET-Wilbur Town

Submitter: CenturyLink

Comment: The proposed service areas are not wholly underserved or unserved.

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Submitter: Odessa Office Equipment

Comment: The NOANet application is a clear overbuild of two existing systems. The Odessa Office Equipment/Accima wireless network and the Century Tel (now Century Link) DSL system. Both have been in operation for years and cover more than just the downtown corridor.

-----**Service Area:** NOANET-Raymond

Submitter: Comcast Cable

Comment: Attached is a summary of the Comcast Cable homes passed, subscriber and advertising information related to the service areas encompassed by this application.

Submitter: CenturyLink

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-----**Service Area:** NOANET-Sunnyside

Submitter: Charter Communications

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-----**Service Area:** NOANET-Odessa

Submitter: CenturyLink

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Odessa Office Equipment/Accima wireless network and the Century Tel (now

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more than just the downtown corridor.

-----**Service Area:** NOANET-Naselle

Submitter: Wahkiakum West Television Inc. dba Wahkiakum West

Comment: The Applicant has applied for funds to serve an area that is neither “unserved” nor “underserved.”

Wahkiakum West Television, dba Wahkiakum West Internet, for and on behalf of itself and its affiliate, Western Wahkiakum County Telephone Company, (collectively, “Wahkiakum West”) opposes the Application to the extent that the proposed funded service area that it proposes consists entirely of a portion Wahkiakum West’s broadband service area, which is depicted on the map of that is included in this response. The proposed funded service area proposed by the Application consists of Naselle, WA and its vicinity. Although the Application identifies that proposed funded service area as “underserved,” that entire proposed service area is neither “unserved” nor “underserved.” Wahkiakum West currently has broadband service available to all households and other end user locations within that proposed funded service area and advertises the availability throughout that service area of broadband service with a downstream speed of up to 5 mbps.

-----**Service Area:** NOANET-Spangle

Submitter: CenturyLink

Comment: The proposed service areas are not wholly underserved or unserved.

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and wireless technology, and a strong commitment and focus on rural areas. Today, it serves over 7 million access lines and 2.1 million broadband customers in 33 states.

-----**Service Area:** NOANET-White Salmon

Submitter: Charter Communications

Comment: Charter Communications ('Charter'), a broadband service provider, has invested capital to provide a full range of Broadband services, including High Speed Internet services, in this service area. The applicant's request in the proposed under-served service area would create an overlap in Charter's service area. Charter's response includes the necessary information to validate the overlapping condition as a result of this applicant's request.

Submitter: CenturyLink

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-----**Service Area:** NOANET-Shelton

Submitter: Comcast Cable

Comment: Attached is a summary of the Comcast Cable homes passed, subscriber and advertising information related to the service areas encompassed by this application.

-----**Service Area:** NOANET-Ritzville

Submitter: CenturyLink

Comment: The proposed service areas are not wholly underserved or unserved.

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-----**Service Area:** NOANET-Midway

Submitter: Comcast Cable

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-----**Service Area:** NOANET-Washougal

Submitter: Comcast Cable

Comment: Attached is a summary of the Comcast Cable homes passed, subscriber and advertising information related to the service areas encompassed by this application.

-----**Service Area:** NOANET-Spokane

Submitter: Comcast Cable

Comment: Attached is a summary of the Comcast Cable homes passed, subscriber and advertising information related to the service areas encompassed by this application.

-----**Service Area:** NOANET-Uniontown

Submitter: Inland Telephone Company

Comment: Northwest Open Access Network "NoaNet" has applied for a grant to serve territory that is currently served by Inland Telephone Company ("Inland"), Uniontown exchange. Inland is a local exchange carrier regulated by the Washington Utilities and Transportation Commission and is also a Rural Utility Service borrower. If the NoaNet grant is approved, government funds will be competing with government funds however, only one entity, Inland Telephone Company, will be paying those funds back to the government.

Inland has broadband (DSL) available to all of its subscribers within the Uniontown exchange. Its competitors in this area are First Step Internet (fixed wireless), Verizon Wireless (mobile broadband), AT&T Wireless (mobile broadband), HughesNet (satellite) and Wild Blue (satellite). Uniontown is not an underserved or unserved area.

Inland primarily markets directly through the distribution of brochures (attached), bill messages, and within the service application.

-----**Service Area:** NOANET-Nine Mile Falls

Submitter: Comcast Cable

Comment: Attached is a summary of the Comcast Cable homes passed, subscriber and advertising information related to the service areas encompassed by this application.

-----**Service Area:** NOANET-Sequim

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 is not challenging the middle mile application submitted by Northwest Open Access Network (“Applicant”), however any federal funding for Applicant’s middle mile project must expressly prohibit the use of such funds to provide last mile service in the proposed funded service area.

-----**Service Area:** NOANET-Mary's Corner

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: The Toledo Telephone Co., Inc.

Comment: This application asserts broadband is not available in this service area. Our company has provided broadband since 2001 and currently offers broadband with download speeds of at least 5 mb to 100% of the subscribers within our service area. Our company built this robust network using USDA/RUS loan funds. We have fiber optics in this area as does Lewis County PUD and 360 Networks. Qwest offers DSL north of our service area but still within the NoaNet request. There are at least 4 companies offering satellite broadband in this area as well. The NoaNet application states there are 602 houses and 882 business establishments in the polygon which is simply not true. We did a door to door count of the business establishments and find only ten (10) total. We estimate total housing units to be approximately 150. NoaNet clearly did not attempt to do any research prior to submitting this application.

-----**Service Area:** NOANET-Reardan

Submitter: CenturyLink

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-----**Service Area:** NOANET-Asotin

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:** NOANET-Lexington

Submitter: Comcast Cable

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-----**Service Area:** NOANET-Deming

Submitter: Comcast Cable

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-----**Service Area:** NOANET-S Cle Elum

Submitter: Inland Telephone Company

Comment: Northwest Open Acces Network ("NoaNet") has applied for grant funds and listed South Cle Elum, Washington, as one of its areas of intended service. In reviewing the map that NoaNet has submitted, a portion of the intended service area is within the service territory of Inland Telephone Company ("Inland"), Roslyn exchange. Inland is a local exchange carrier regulated by the Washington Utlities and Transportation Commission and is also a Rural Utility Service borrower. If the NoaNet grant is approved, government funds will be competing with government funds however, only one entity, Inland Telephone Company, will be paying back the government.

Inland has broadband (DSL) available to all of the subscribers within the roslyn exchange. It competes with Simplified Technologies (fixed wireless), Verizon Wireless (mobile broadband), HughesNet (satellite) and Wild Blue (satellite). Another fixed wireless provider (Clearwire) may soon be joining the competition; applying for co-location on a local tower. This area is not underserved or unserved.

Inland employs 51 community members in the Roslyn exchange. It is not clear how many community members will be employed by NoaNet or if the introduction of another competitor in this area will cause any other providers to down size.

Inland primarily markets service directly through the distribution of brochures (attached), bill messages, and within its service application.

Submitter: R & R Cable Company

Comment: Northwest Open Access Network ("NoaNet") has proposed in their filing that South Cle Elum, Washington, is an unserved or underserved area. To the contrary. South Cle Elum has broadband service available from Qwest (DSL), R & R Cable Company (cable Modem), Verizon Wireless (mobile broadband), Simplified Technologies (fixed wireless), Inland Networks (fixed wireless), HughesNet

(satellite) and Wild Blue (satellite). There is no shortage of competition. In NoaNet's application, they have used the appropriate "buzz" words in order to have their application noticed by NTIA; "Extend broadband services into critical health, EMS and public safety entities..." when these entities have access to broadband today. It is our understanding that part of the application process was for the applicant to investigate whether or not broadband was available in an area prior to making application. It is apparent that NoaNet skipped this step. By the population listed and the proposed service area map, this filing also covers the community of Cle Elum which is also served by the above listed service providers and it is not listed as in the "Communities Chosen" section of the NoaNet application. Cle Elum is the larger of the two communities. With this many providers competing within these communities, how can another provider make a "sustained" business case which is a requirement of the application. Our advertising for available services is direct. The example provided is an 8.5" x 11" version of the 3' x 2' poster that appears in the window of our downtown Cle Elum office which leads me to another question that reviewers should also be looking for in an application, how many people within the community will NoaNet employ?

-----**Service Area:** NOANET-Morton

Submitter: CenturyLink

Comment: The proposed service areas are not wholly underserved or unserved.

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.

CenturyLink has committed to upgrade and extend broadband.

CenturyLink has an extensive broadband footprint today, and has committed to extend that service even further. As part of its merger commitments to the Federal Communications Commission, CenturyLink committed to offer retail broadband Internet access service to 100% of its broadband eligible access lines by July 1, 2012. Consequently, virtually no areas served by CenturyTel or Embarq local operating companies, in any state, will be underserved or unserved at the end of three years.

CenturyLink also agreed to meet targets for minimum download speeds. CenturyLink will ensure availability of retail broadband Internet access service with a download speed of 1.5 Mbps to 87% of the broadband eligible access lines by July 1, 2011. It will ensure availability with a download speed of 3 Mbps to 75% of broadband eligible access lines by July 1, 2010, to 78% of broadband eligible lines by July 1, 2011, and to 80% of broadband eligible lines within 3 years of the close date. Nationwide, our average tele-density is 23 customers per square mile. This commitment ensures availability of broadband even to very rural consumers.

The agency should consider the importance of this commitment, as CenturyLink's continuing investment inevitably will make applications that overlap CenturyLink service areas less viable. CenturyLink has proven, industry-leading experience in deploying broadband networks and services using both wireline and wireless technology, and a strong commitment and focus on rural areas. Today, it serves over 7 million access lines and 2.1 million broadband customers in 33 states.

-----**Service Area:** NOANET-Neah Bay

Submitter: CenturyLink

Comment: The proposed service areas are not wholly underserved or unserved.

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.

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-----**Service Area:** NOANET-Creston

Submitter: Odessa Office Equipment

Comment: The NOANet application is a clear overbuild of two existing systems. The Odessa Office Equipment/Accima wireless network and the Century Tel (now Century Link) DSL system. Both have been in operation for years and cover more than just the downtown corridor.

-----**Service Area:** NOANET-McCleary

Submitter: Comcast Cable

Comment: Attached is a summary of the Comcast Cable homes passed, subscriber and advertising information related to the service areas encompassed by this application.

-----**Service Area:** NOANET-Skamokawa

Submitter: CenturyLink

Comment: The proposed service areas are not wholly underserved or unserved.

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.

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The agency should consider the importance of this commitment, as CenturyLink's continuing investment inevitably will make applications that overlap CenturyLink service areas less viable. CenturyLink has

proven, industry-leading experience in deploying broadband networks and services using both wireline and wireless technology, and a strong commitment and focus on rural areas. Today, it serves over 7 million access lines and 2.1 million broadband customers in 33 states.

-----**Service Area:** NOANET-Wilson Creek

Submitter: CenturyLink

Comment: The proposed service areas are not wholly underserved or unserved.

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.

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The agency should consider the importance of this commitment, as CenturyLink's continuing investment inevitably will make applications that overlap CenturyLink service areas less viable. CenturyLink has proven, industry-leading experience in deploying broadband networks and services using both wireline and wireless technology, and a strong commitment and focus on rural areas. Today, it serves over 7 million access lines and 2.1 million broadband customers in 33 states.

-----**Service Area:** NOANET-Moses Lake

Submitter: Northland Communications Corporation

Comment: N/A

-----**Service Area:** NOANET-Rosburg

Submitter: Wahkiakum West Television Inc. dba Wahkiakum West

Comment: The Applicant has applied for funds to serve an area that is neither "unserved" nor "underserved."

Wahkiakum West Television, dba Wahkiakum West Internet, for and on behalf of itself and its affiliate, Western Wahkiakum County Telephone Company, (collectively, "Wahkiakum West") opposes the Application to the extent that the proposed funded service area that it proposes consists entirely of a portion Wahkiakum West's broadband service area, which is depicted on the map of that is included in this response. The proposed funded service area proposed by the Application consists of Rosburg, WA and its vicinity. Although the Application identifies that proposed funded service area as "unserved," that entire proposed service area is neither "unserved" nor "underserved." Wahkiakum West currently has broadband service available to all households and other end user locations within that proposed funded service area and advertises the availability throughout that service area of broadband service with a downstream speed of up to 5 mbps.