

## Broadband USA Applications Database

**Applicant Name:** Pinpoint Communications, Inc.

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### Public Notice Submissions

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**Submitter:** ATCJet.net LLC

**Comment:** ATCJet.net, LLC provides high speed broadband internet service to its service territory with download speeds ranging from 1 Mbps up to 7 Mbps; and upload speeds from 256 kbps up to 768 kbps. ATCJet.net, LLC does not charge an installation fee and monthly pricing plans begin at an affordable rate of \$29.95. ATCJet.net, LLC is capable of offering broadband service to all the households in its service territory.

**Submitter:** Applied Communications Technology, Inc.

**Comment:** Applied Communications Technology provides high speed broadband internet service to its service territory with download speeds ranging from 1 Mbps up to 7 Mbps; and upload speeds from 256 kbps up to 768 kbps. Applied Communications Technology does not charge an installation fee and monthly pricing plans begin at an affordable rate of \$29.95. Applied Communications Technology is capable of offering broadband service to all the households in its service territory.

**Submitter:** ATC Communications

**Comment:** Arapahoe Telephone Company (ATC Communications) provides high speed broadband internet service to its service territory with download speeds ranging from 1 Mbps up to 7 Mbps; and upload speeds from 256 kbps up to 768 kbps. ATC does not charge an installation fee and monthly pricing plans begin at an affordable rate of \$29.95. ATC is capable of offering broadband service to all the households in its service territory.

**Submitter:** BWTelcom

**Comment:** Benkelman, Wauneta and Hartman Telephone Companies, dba BWTelcom, currently provide Broadband service inside their certificated exchange area that meets or exceeds all ARRA NOFA requirements to be classified as a "Served" area. 100% of the households have access to Broadband service of at least 768/200 Kbps. The current residential penetration rate of 768/200 Kbps or higher is 46% of households. BWTelcom advertises and offers a 5 Mbps service.

**Submitter:** Great Plains Communications, Inc

**Comment:** Pinpoint Communications, Inc. (Pinpoint) has applied for broadband funding in the amount of \$3.2 million for a last mile project for the Cambridge, NE proposed funded service area (PFSA). Great Plains Communications, Inc. (GPC) provides broadband service in the Cambridge PFSA. Pinpoint claims that 12,282 of the housing units are underserved. For the reasons set forth herein, this PFSA should not be considered underserved.

GPC's "overlay" map shows the portions of the Cambridge PFSA in which GPC provides facilities-based terrestrial broadband service. Specifically, GPC provides broadband service availability (per the definition in the NOFA) to 5,167 residential and business locations, a population of 10,579. Of the 12,282 units that Pinpoint designates as underserved, 42.1% of those have broadband service available from GPC -- i.e., these locations are served.

There are other broadband providers serving some portion of the Cambridge PFSA -- these other broadband providers include ATC, Qwest, Frontier, McCookNet, ATC JETNET and Consolidated Communications. In addition, it appears that Verizon Wireless may have coverage in Pinpoint Cambridge PFSA. This can be ascertained by entering a selected zip code from the Pinpoint Cambridge PFSA into the Verizon Wireless coverage locator at [www.verizonwireless.com](http://www.verizonwireless.com). Thus, once one takes into account GPC and other facilities-based providers offering terrestrial broadband service within the Pinpoint Cambridge PFSA, it is highly likely that more than 50% of the households in that PFSA have access to facilities-based terrestrial broadband services -- meaning that it would not qualify as "underserved" based upon the availability criterion.

Moreover, as discussed elsewhere herein, the Pinpoint Cambridge PFSA likely fails to satisfy any other criteria that would qualify the PFSA as underserved (assuming the applicant even asserted any basis other than availability as the justification for its underserved claim). Specifically, the GPC customers in the PFSA subscribe to the broadband services offered by GPC, and GPC advertises a broadband service with transmission speeds of at least 3 Mbps downstream within the PFSA. Similar advertised availability is also likely the case for the other broadband providers in the Pinpoint Cambridge PFSA.

The Pinpoint application, based on its map and project description, proposes a wireless-based solution relying on Worldwide Interoperability for Microwave Access (WiMAX) technology. However, it is unlikely that WiMAX would provide broadband service availability to all of the 3,613 square miles identified in the PFSA. This is beyond the fact that this area is already significantly served by a number of facilities-based providers as noted above.

WiMAX is not only an extremely expensive technology to deploy with its dependence on large numbers of tower sites, but in addition it suffers from the inherent technical limitations of any spectrum-based technology. In rural areas, such as those comprised in much of the Pinpoint application, the greater distance a customer is from a tower, the less likely that claimed speeds are attained. All wireless technologies, WiMAX included are terrain-limited, with hills greatly reducing the distances in which service is available. Also, unlike fiber, engineering experts agree that wireless is not expected to be a good platform for video services due to limited bandwidth and external influences. It is inappropriate that scarce stimulus program resources would possibly be utilized for deployment of such an expensive technology in rural areas where other facilities-based services exists at a significant level of availability.

Granting Pinpoint's application constitutes an inefficient and redundant use of funds. Pinpoint's claims are unsubstantiated. Therefore, its application should be rejected.

**Submitter:** Consolidated Companies Inc.

**Comment:** Consolidated Companies is the parent company of four rural local exchange carriers, three of which provide telephone and broadband service to the PFSA for which Pinpoint has applied for broadband funding. Consolidated Companies' response polygon has been input to the mapping tool. One hundred percent of the households within the response polygon have access to broadband as defined in the NOFA.

The applicant's PFSA contains 9,972 households of which 761 households have access to broadband from Consolidated. The respondent provides, and advertises the availability of 3Mbps broadband service within the PFSA, so the PFSA does not qualify as underserved based on the 3Mbps criterion.

