

Broadband USA Applications Database

Applicant Name: SHO-ME TECHNOLOGIES L.L.C.

Public Notice Submissions

-----**Service Area:** Mercer

Submitter: Grand River Mutual Tel.

Comment: Show Me Technologies' application covers part of Grand River Mutual Telephone Company's exchange. Grand River is capable of providing wireline broadband service to 100% of its customers throughout its territory. The majority of Grand River's customers receive service at 6.0 Mbps. Grand River's territory is neither unserved nor underserved.

Submitter: Missouri Network Alliance, L.L.C.

Comment: Missouri Network Alliance, L.L.C. (MNA) is a "middle-mile" broadband services provider and an existing RUS borrower. As one of the early RUS Broadband Pilot Program loan fund recipients, MNA has deployed a "state-of-the-art" high capacity broadband network within the service area defined by the Applicant. The MNA network is a DWDM/SONET based network capable of supporting 40 wavelengths at 10 Gbps of capacity each. The applicant's network deployment would be an unnecessary duplication of existing broadband infrastructure provided by a financial sound company owned by 15 rural independent telephone companies.

-----**Service Area:** Scotland

Submitter: Northeast Missouri Rural Telephone Company

Comment: Northeast Missouri Rural Telephone Company (NEMR) offers middle mile services to connect the communities of Unionville, Livonia, Worthington, Martinstown, Lemons, Pollock, Green City, Green Castle, Winigan, Milan, Novinger, Kirksville, Queen City, Memphis, Arbela, Rutledge and Luray, in the counties of Adair, Putnam, Sullivan, Schuyler, Scotland and Clark all in the State of Missouri. NEMR has a state-of-art SONET OC 192 transport network that connects all these communities and offers a capacity of 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. Further, NEMR is a member owner of the 14 ILEC member Missouri Network Alliance (MNA) network. This network covers much of Missouri and connects NEMR by this state-of-art fiber network and the other owners into the Kansas City Metro area where it connects with major Internet providers. NEMR has a 90 Mb data connection on MNA to redundant Internet POPs in Kansas City.

Based on the above factors, RUS/NTIA must reject the SHO-ME TECHNOLOGIES L.L.C. application. The public interest goals suggested by the proposed project are being accomplished using existing "middle-mile" infrastructure and 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 NEMR and its affiliated companies currently provides (and will continue to provide) highly reliable, state-of-the-art services to the businesses and residents of these communities.

-----**Service Area:** Crawford

Submitter: Fidelity Communications Co. and subsidiaries

Comment: Fidelity Telephone Co., a wholly-owned subsidiary of Fidelity Communications Co., is an ILEC providing telecommunications services in a portion of the Applicant's proposed funded middle mile service area in Crawford County, Missouri. Fidelity has provided quality service in rural exchanges since the 1940's and has built a robust broadband network, providing DSL services since 2002 at current speeds up to 5Mbps. Fidelity has another subsidiary, Fidelity Cablevision, providing cable modem broadband service in this same area at speeds up to 15Mbps.

Submitter: Missouri Network Alliance, L.L.C.

Comment: Missouri Network Alliance, L.L.C. (MNA) is a "middle-mile" broadband services provider and an existing RUS borrower. As one of the early RUS Broadband Pilot Program loan fund recipients, MNA has deployed a "state-of-the-art" high capacity broadband network within the service area defined by the Applicant. The MNA network is a DWDM/SONET based network capable of supporting 40 wavelengths at 10 Gbps of capacity each. The applicant's network deployment would be an unnecessary

duplication of existing broadband infrastructure provided by a financial sound company owned by 15 rural independent telephone companies.

-----**Service Area:** Macon

Submitter: Northeast Missouri Rural Telephone Company

Comment:

Northeast Missouri Rural Telephone Company (NEMR) offers middle mile services to connect the communities of Unionville, Livonia, Worthington, Martinstown, Lemons, Pollock, Green City, Green Castle, Winigan, Milan, Novinger, Kirksville, Queen City, Memphis, Arbela, Rutledge and Luray, in the counties of Adair, Putnam, Sullivan, Schuyler, Scotland and Clark all in the State of Missouri. NEMR has a state-of-art SONET OC 192 transport network that connects all these communities and offers a capacity of 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. Further, NEMR is a member owner of the 14 ILEC member Missouri Network Alliance (MNA) network. This network covers much of Missouri and connects NEMR by this state-of-art fiber network and the other owners into the Kansas City Metro area where it connects with major Internet providers. NEMR has a 90 Mb data connection on MNA to redundant Internet POPs in Kansas City.

Based on the above factors, RUS/NTIA must reject the SHO-ME TECHNOLOGIES L.L.C. application. The public interest goals suggested by the proposed project are being accomplished using existing “middle-mile” infrastructure and 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 NEMR and its affiliated companies currently provides (and will continue to provide) highly reliable, state-of-the-art services to the businesses and residents of these communities.

Submitter: Missouri Network Alliance, L.L.C.

Comment: Missouri Network Alliance, L.L.C. (MNA) is a "middle-mile" broadband services provider and an existing RUS borrower. As one of the early RUS Broadband Pilot Program loan fund recipients, MNA has deployed a "state-of-the-art" high capacity broadband network within the service area defined by the Applicant. The MNA network is a DWDM/SONET based network capable of supporting 40 wavelengths at 10 Gbps of capacity each. The applicant's network deployment would be an unnecessary duplication of existing broadband infrastructure provided by a financial sound company owned by 15 rural independent telephone companies.

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.

Submitter: Chariton Telcom

Comment: Chariton Valley Telephone currently provides broadband access capability to 100% of the households within the area of the proposed funded serving area indicated "PFSA" challenged area. Chariton Valley Telephone is a rural ILEC that has been serving the area for some time. In the challenged PFSA they currently offer ADSL broadband and FTTH broadband data services. As of June 2009 they are serving broadband customers within this area or 40.4% of the households with Broadband. Chariton Valley Telephone offers speeds of over 3Mbps throughout this area. All of the wireline customers have 768Kbps or above access speeds in this area. Therefore by any of the definitions of the ARRA broadband program this area does not qualify as unserved and 3Mbps speeds are available throughout the challenge area.

-----**Service Area:** Daviess

Submitter: Grand River Mutual Tel.

Comment: Show Me Technologies' application covers part of Grand River Mutual Telephone Company's exchange. Grand River is capable of providing wireline broadband service to 100% of its customers throughout its territory. The majority of Grand River's customers receive service at 6.0 Mbps. Grand River's territory is neither unserved nor underserved.

Submitter: Missouri Network Alliance, L.L.C.

Comment: Missouri Network Alliance, L.L.C. (MNA) is a "middle-mile" broadband services provider and an existing RUS borrower. As one of the early RUS Broadband Pilot Program loan fund recipients, MNA has deployed a "state-of-the-art" high capacity broadband network within the service area defined by the Applicant. The MNA network is a DWDM/SONET based network capable of supporting 40 wavelengths at 10 Gbps of capacity each. The applicant's network deployment would be an unnecessary duplication of existing broadband infrastructure provided by a financial sound company owned by 15 rural independent telephone companies.

Submitter: Green Hills Telephone Corp, dba: Green Hills Co's

Comment: Green Hills' and its Affiliates have access to the middle mile from two different sources (Iowa Network Services (INS) & Missouri Network Alliance (MNA)). Green Hills' could use these sources to achieve low cost redundant Broadband service to our last mile customers.

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.”

-----**Service Area:** Perry

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:** Cooper

Submitter: CenturyLink

Comment: 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. We attach a representative sample of areas where the application overlaps our existing broadband deployment. This data is not exhaustive; the application may include other areas also currently served with broadband by CenturyLink or other providers. We will provide additional information on request if that will further assist the agency's review.

CenturyLink also provides data showing broadband availability in local telephone exchanges within the proposed service areas. This includes areas served by CenturyLink and/or other broadband providers. This data further show the applicant would duplicate and overlap existing 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 7 million access lines and 2.1 million broadband customers in 33 states.

-----**Service Area:** Nodaway

Submitter: Grand River Mutual Tel.

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Submitter: IAMO Telephone CO

Comment: 100% of this service area has access to broadband service.

Submitter: Missouri Network Alliance, L.L.C.

Comment: Missouri Network Alliance, L.L.C. (MNA) is a "middle-mile" broadband services provider and an existing RUS borrower. As one of the early RUS Broadband Pilot Program loan fund recipients, MNA has deployed a "state-of-the-art" high capacity broadband network within the service area defined by the Applicant. The MNA network is a DWDM/SONET based network capable of supporting 40 wavelengths at 10 Gbps of capacity each. The applicant's network deployment would be an unnecessary duplication of existing broadband infrastructure provided by a financial sound company owned by 15 rural independent telephone companies.

Submitter: CenturyLink

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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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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.

Submitter: American Broadband Nodaway DSL & Wireless

Comment: Holway Telephone Company is an incumbent local exchange carrier (ILEC), which is authorized by the Missouri Public Service Commission (PSC) and the Federal Communications Commission (FCC) to provide advanced and reliable telecommunications services ubiquitously throughout its designated serving areas in northwest Missouri. The Holway Telephone Company offers broadband internet and data services utilizing digital subscriber line (DSL) and fixed wireless technologies. Holway offers broadband services at speeds that meet and exceed the minimum download (768 Kbps) and upload (200 Kbps) speeds defined in the NOFA. This specific response is from the perspective of the Holway broadband services that are offered within its designated serving areas that overlap with the SHOW-ME Technologies, L.L. C. Middle/ Last Mile Stimulus Application in Nodaway County, Missouri. Holway advertises broadband service alternatives that meet and exceed minimum download and upload speeds defined in the NOFA.

Holway enjoys broadband penetration rates that exceed 40% of households in many of census blocks contained within its serving areas, and this does not count/include the penetration of other broadband competitors that operate in the service area that SHOW-ME Technologies L.L.C. has applied for.

SHOW-ME Technologies L.L.C. has submitted a broadband stimulus application that overlaps Holway Telephone Company serving areas. The SHOW-ME Technologies L.L.C. application overlaps with 193 census blocks in which Holway offers DSL and fixed wireless broadband services. In these 193 census blocks, Holway provides broadband service to 87 residential customers and 2 business customers. Holway approaches 22% penetration amongst residences all by itself and this does not include the number of residences served by other broadband competitors. Thus, the overlap area in the SHOW-ME Technologies L.L.C. application is not unserved and it is not underserved. Furthermore, Holway offers its broadband service at speeds that exceed the NOFA minimums and exceed 3 Mbps, and Holway advertises speeds that exceed 3 Mbps.

The SHOW-ME Technologies L.L.C. stimulus application should be rejected for several reasons, which include but are not limited to:

1. SHOW-ME Technologies L.L.C. applied for Stimulus dollars in areas (Census Blocks) that are not unserved or underserved.

2.The SHOW-ME Technologies L.L.C. application is overly broad because it did not seek to perform validations of broadband penetration rates at the Census Block level, whereas Holway currently provides, advertises, and tracks broadband penetration to the Census Block level within its designated serving areas.

3.Broadband stimulus dollars should not be directed to areas that do not meet the definitions of unserved or underserved territory.

4.SHOW-ME Technologies L.L.C. proposes a wireless technology solution for the last mile portion of its application in rural communities using 200 foot towers. Only Fiber-to-the-Premise solutions offer a long term future-proof solution for meeting the challenge of a rapidly increasing definition of minimum download and upload speeds. SHOW-ME Technologies L.L.C. is only one of several wireless providers within the geography applied for that already offer data services over their wireless networks (Verizon, AllTel, Sprint, AT&T, etc.). Furthermore, the middle mile portion of the application is largely redundant with respect to the fact that the Missouri Network Alliance (MNA) already has a robust fiber optic middle mile infrastructure that is already in place across vast sections of the state of Missouri.

5.SHOW-ME Technologies L.L.C.'s application overlaps with the designated service areas of Holway. It is not apparent that SHOW-ME Technologies L.L.C. has addressed the challenge of its application's ability to be economically sustainable in areas that lack population density, and are already populated with multiple providers.

6.Beyond initial network deployment, wireless infrastructure solutions have not demonstrated the ability to create sustained employment opportunities within the immediate service area. This is contrasted by the fact that Holway has a resident work force, located within its designated serving areas in northwest Missouri, and it has a history of sustained employment.

-----**Service Area:** Holt

Submitter: Missouri Network Alliance, L.L.C.

Comment: Missouri Network Alliance, L.L.C. (MNA) is a "middle-mile" broadband services provider and an existing RUS borrower. As one of the early RUS Broadband Pilot Program loan fund recipients, MNA has deployed a "state-of-the-art" high capacity broadband network within the service area defined by the Applicant. The MNA network is a DWDM/SONET based network capable of supporting 40 wavelengths at 10 Gbps of capacity each. The applicant's network deployment would be an unnecessary

duplication of existing broadband infrastructure provided by a financial sound company owned by 15 rural independent telephone companies.

Submitter: Oregon Farmers Mutual Telephone Company

Comment: This is a middle mile grant that has two purposes. First, it proposes to build an extensive network to bring broadband into rural parts of the state. This is a laudable goal, but we would point out that there is already an extensive statewide network built by the Missouri Network Alliance (MNA) that already has built such a network to many of these same places. For example, the MNA network already brings very inexpensive backbone broadband to the area served today by the Oregon Farmers Mutual Telephone Company that would be covered by this grant request. This proposed grant should be rejected in the first funding round and be asked to resubmit to build fiber only to those parts of the state that do not already have middle mile fiber. It seems senseless and wasteful to subsidize building backbone network to places that already have this kind of infrastructure built with private dollars. In fact, the MNA network was financed largely by RUS funding and MNA still has an open RUS loan. To build to rural areas that already have such a network is a waste of funding dollars since the small populations in these rural areas cannot generate enough usage to justify a second fiber network. This proposed network does propose to bring fiber to many new communities that don't have affordable broadband and this proposal could be fundable if they scaled back the request to build to communities that lack fiber backbone.

Second, the proposal asks to place a wireless tower in 200 rural towns with populations under 400. This again is a laudable goal. However, there are two problems with this portion of the proposal. First, the grant applicants seem to have not done their homework to determine if any of these 200 areas are already served. For example, this grant request proposes to build a wireless tower that would completely cover the service territory of Oregon Farmers Mutual Telephone Company. Oregon Farmers is an incumbent rural telephone company that has been serving this area for over 100 years. Oregon Farmers has been granted a franchised area to serve, and since it has been willing to serve a very poor and rural area also has been given a federal exemption against competition. Small rural areas like the one served by Oregon Farmers need a barrier against competition to ensure that people in the area can continue to get telephone and data services for the next century. Oregon Farmers has kept rates low and has brought advanced services and broadband to this rural area when nobody else was willing to make investments in such an impoverished area.

The Oregon Farmers service territory is 'served' today using the definitions of the NOFA since the company has 1) more than a 40% broadband penetration, and 2) advertises broadband speeds of 3 Mbps.

Thus, the grant should be rejected and in the second round the applicants should limit their request to those places that don't have broadband today or that are underserved by the definitions set forth in the NOFA. The grant applicants have a great idea but have not taken the time to adhere to the very specific rules specified by this grant process.

The second problem with funding the grant as written is that the wireless towers are essentially last mile infrastructure, and thus this grant seems to be mixing middle mile and last mile network equipment in the same grant request. To strictly adhere to the NOFA rules this ought to be segregated into two grant requests - one for the middle mile fiber network and one for the last mile wireless infrastructure, so that each can be judged on their own merits. Combining these two different networks in the same grant request means that this is neither a last mile or a middle mile grant request, but both.

This grant should be rejected in its entirety for not adhering to the grant guidelines for serving mostly unserved and underserved areas. We believe that a large percentage of residences and businesses covered by this proposed grant are 'served' with broadband using the definitions defined in the NOFA. This grant seems to assume that rural equates to 'underserved' and 'unserved' as defined in the NOFA. This is not the case and the county seats, other towns and most census designated areas within the proposed service area already have broadband today and are not eligible for grant funding. Even many of the rural areas such as that covered by Oregon Farmers have complete broadband coverage today. The NOFA allows using only a small portion of any grant to cover served areas, but this grant seeks to use grant money to bring broadband mostly to places that are defined as 'served' under the NOFA. Again, this grant request should be rejected. Further, the grant application has erroneously mixed last and middle mile infrastructure in the same grant request, making it impossible to distinguish one part of the network from the other.

-----**Service Area:** Howell

Submitter: Cable America Missouri LLC

Comment: In the area of Willow Springs, CableAmerica has completed design, secured financing and begun construction on this recently acquired system. Upon the completion of construction, we will pass 1941 homes. We will offer Broadband speeds of over 5Mbps download and 512Kbps upload when construction is complete priced in line with our other systems in the area. Construction is projected to be completed by 12/31/09.

Submitter: CenturyLink

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

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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.

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Submitter: Peace Valley Telephone Co., Inc.

Comment: I write on behalf of Peace Valley Telephone Co., Inc. We are a small Incumbent Local Exchange Carrier in Howell and a small portion of Oregon County Missouri. We operate as an independent telecommunications carrier of last resort. We cover approximately 100 square miles between West Plains, MO, Mountain View, MO, Pomona, MO and the Shannon County line. Also, our territory stretches into Oregon County in a few small areas. We have expended large sums of our own money, as no grants or loans were used, to provide high speed broadband internet to our customers. We have broadband availability to 100% of our customers. We use ADSL2 and HVDL technologies. Our service is very reliable.

To allow another carrier to come in, and put in place an additional service plant, would not be cost effective or necessary. We have worked hard, in a very low population density area and a high cost area, to provide quality broadband coverage without loans or grants. The issue of faster speeds, in our low population, high cost area, is not a need for a new network, it is a need for lower costs in obtaining the bandwidth connection to the internet. A lower cost would allow us to provide even higher speeds over the current network. We looked into putting up towers for aerial wireless broadband but given the hills, the trees and the general terrain, all studies showed it could not cover 100% of our customers like we currently do. Our broadband network and coverage is very reliable and meets the needs of 100% of our customers.

-----**Service Area:** Webster

Submitter: CenturyLink

Comment: Respondent's Summary (Not confidential)

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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:** Warren

Submitter: CenturyLink

Comment: Respondent's Summary (Not confidential)

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.

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-----**Service Area:** Lafayette

Submitter: Alma Communications

Comment: Alma Communications has fiber to the home to all customers in our serving area. All capable of high speed internet.

Submitter: Missouri Network Alliance, L.L.C.

Comment: Missouri Network Alliance, L.L.C. (MNA) is a "middle-mile" broadband services provider and an existing RUS borrower. As one of the early RUS Broadband Pilot Program loan fund recipients, MNA has deployed a "state-of-the-art" high capacity broadband network within the service area defined by the Applicant. The MNA network is a DWDM/SONET based network capable of supporting 40 wavelengths at 10 Gbps of capacity each. The applicant's network deployment would be an unnecessary duplication of existing broadband infrastructure provided by a financial sound company owned by 15 rural independent telephone companies.

Submitter: CenturyLink

Comment: 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 7 million access lines and 2.1 million broadband customers in 33 states.

-----**Service Area:** Ozark

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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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:** Audrain

Submitter: US Cable of Coastal-Texas, L.P.

Comment: US Cable of Coastal-Texas, L.P. provides high speed broadband internet service in communities that are within the applicant's proposed service area.

Submitter: Missouri Network Alliance, L.L.C.

Comment: Missouri Network Alliance, L.L.C. (MNA) is a "middle-mile" broadband services provider and an existing RUS borrower. As one of the early RUS Broadband Pilot Program loan fund recipients, MNA has deployed a "state-of-the-art" high capacity broadband network within the service area defined by the Applicant. The MNA network is a DWDM/SONET based network capable of supporting 40 wavelengths at 10 Gbps of capacity each. The applicant's network deployment would be an unnecessary duplication of existing broadband infrastructure provided by a financial sound company owned by 15 rural independent telephone companies.

Submitter: Farber Telephone Company

Comment: Farber Telephone Company currently deploys DSL capable of providing a minimum of 768kbps Broadband Internet Service, all households in the Farber Telephone Exchange area are capable of receiving this service. Farber Telephone Company began planning for the construction of an RUS/RDUP financed Fiber to The Home project in the 1st Quarter of 2008, upon completion the network will be capable of delivering a minimum of 100Mbps to each establishment within the Farber Telephone Company Exchange. Completion of this project should be accomplished well within the build out timeframe given to successful applications awarded thru the Broadband Initiatives Program or Broadband Technology Opportunities Program.

Submitter: CenturyLink

Comment: 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. We attach a representative sample of areas where the application overlaps our existing broadband deployment. This data is not exhaustive; the application may include other areas also currently served with broadband by CenturyLink or other providers. We will provide additional information on request if that will further assist the agency's review.

CenturyLink also provides data showing broadband availability in local telephone exchanges within the proposed service areas. This includes areas served by CenturyLink and/or other broadband providers. This data further show the applicant would duplicate and overlap existing broadband services in the proposed service areas.

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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 7 million access lines and 2.1 million broadband customers in 33 states.

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.”

-----**Service Area:** Cape Girardeau

Submitter: Semo Communications, Incorporated

Comment: Semo Communications, Incorporated advertises and provides high speed data service in speeds of up to 8 mbps download and 768 kbps upload in the proposed funded service area.

-----**Service Area:** Saline

Submitter: Missouri Network Alliance, L.L.C.

Comment: Missouri Network Alliance, L.L.C. (MNA) is a "middle-mile" broadband services provider and an existing RUS borrower. As one of the early RUS Broadband Pilot Program loan fund recipients, MNA has deployed a "state-of-the-art" high capacity broadband network within the service area defined by the Applicant. The MNA network is a DWDM/SONET based network capable of supporting 40 wavelengths at 10 Gbps of capacity each. The applicant's network deployment would be an unnecessary duplication of existing broadband infrastructure provided by a financial sound company owned by 15 rural independent telephone companies.

Submitter: CenturyLink

Comment: Respondent's Summary (Not confidential)

The proposed service areas are not wholly underserved or unserved.

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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.

Submitter: Imagination Inc dba I-Land Internet Services

Comment: Imagination Inc, dba I-Land Internet Services, respectfully requests that the services we offer and the customers we serve are considered in determining funding for this application. We offer point-to-point wireless broadband service and DSL in numerous areas throughout Missouri, including areas within this application, and are continually expanding our service areas. We have been providing broadband service for over five years and deployed WiMax service in the past year. We currently provide broadband service to well over 3,000 customers, and those customer numbers will only continue to grow significantly as we expand our service areas. We are committed to investing in our networks in order to provide broadband service to both our existing and future customers.

-----**Service Area:** Randolph

Submitter: US Cable of Coastal-Texas, L.P.

Comment: US Cable of Coastal-Texas, L.P. provides high speed data service.

Submitter: Missouri Network Alliance, L.L.C.

Comment: Missouri Network Alliance, L.L.C. (MNA) is a "middle-mile" broadband services provider and an existing RUS borrower. As one of the early RUS Broadband Pilot Program loan fund recipients, MNA has deployed a "state-of-the-art" high capacity broadband network within the service area defined by the Applicant. The MNA network is a DWDM/SONET based network capable of supporting 40 wavelengths at 10 Gbps of capacity each. The applicant's network deployment would be an unnecessary duplication of existing broadband infrastructure provided by a financial sound company owned by 15 rural independent telephone companies.

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.

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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."

-----**Service Area:** Mississippi

Submitter: Semo Communications, Incorporated

Comment: Semo Communications, Incorporated advertises and provides high speed data service in speeds of up to 8 mbps download and 768 kbps upload in the proposed funded service area.

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:** Douglas

Submitter: CenturyLink

Comment: Respondent's Summary (Not confidential)

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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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.

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-----**Service Area:** Lincoln

Submitter: CenturyLink

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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.

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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.”

-----**Service Area:** Linn

Submitter: Northeast Missouri Rural Telephone Company

Comment: Northeast Missouri Rural Telephone Company (NEMR) offers middle mile services to connect the communities of Unionville, Livonia, Worthington, Martinstown, Lemons, Pollock, Green City, Green Castle, Winigan, Milan, Novinger, Kirksville, Queen City, Memphis, Arbela, Rutledge and Luray, in the counties of Adair, Putnam, Sullivan, Schuyler, Scotland and Clark all in the State of Missouri. NEMR has a state-of-art SONET OC 192 transport network that connects all these communities and offers a capacity of 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. Further, NEMR is a member owner of the 14 ILEC member Missouri Network Alliance (MNA) network. This network covers much of Missouri and connects NEMR by this state-of-art fiber network and the other owners into the Kansas

City Metro area where it connects with major Internet providers. NEMR has a 90 Mb data connection on MNA to redundant Internet POPs in Kansas City.

Based on the above factors, RUS/NTIA must reject the SHO-ME TECHNOLOGIES L.L.C. application. The public interest goals suggested by the proposed project are being accomplished using existing "middle-mile" infrastructure and 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 NEMR and its affiliated companies currently provides (and will continue to provide) highly reliable, state-of-the-art services to the businesses and residents of these communities.

Submitter: Missouri Network Alliance, L.L.C.

Comment: Missouri Network Alliance, L.L.C. (MNA) is a "middle-mile" broadband services provider and an existing RUS borrower. As one of the early RUS Broadband Pilot Program loan fund recipients, MNA has deployed a "state-of-the-art" high capacity broadband network within the service area defined by the Applicant. The MNA network is a DWDM/SONET based network capable of supporting 40 wavelengths at 10 Gbps of capacity each. The applicant's network deployment would be an unnecessary duplication of existing broadband infrastructure provided by a financial sound company owned by 15 rural independent telephone companies.

Submitter: Green Hills Telephone Corp, dba: Green Hills Co's

Comment: Green Hills' and its Affiliates have access to the middle mile from two different sources (Iowa Network Services (INS) & Missouri Network Alliance (MNA)). Green Hills' could use these sources to achieve low cost redundant Broadband service to our last mile customers.

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.”

Submitter: Chariton Valley Telephone

Comment: Chariton Valley Telephone currently provides broadband access capability to 95% of the households within the area of the proposed funded serving area indicated “PFSA” challenged area. Chariton Valley Telephone is a rural ILEC that has been serving the area for some time. In the challenged PFSA they currently offer ADSL broadband and FTTH broadband data services. As of June 2009 they are serving broadband customers within this area or 8% of the households with Broadband. Chariton Valley Telephone offers speeds of over 3Mbps throughout this area. All of the wireline customers have 768Kbps or above access speeds in this area. Therefore by any of the definitions of the ARRA broadband program this area does not qualify as unserved and 3Mbps speeds are available throughout the challenge area.

Submitter: Grand River Mutual Tel.

Comment: Show Me Technologies' application covers part of Grand River Mutual Telephone Company's exchange. Grand River is capable of providing wireline broadband service to 100% of its customers throughout its territory. The majority of Grand River's customers receive service at 6.0 Mbps. Grand River's territory is neither unserved nor underserved.

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

Submitter: US Cable of Coastal-Texas, L.P.

Comment: US Cable of Coastal-Texas, L.P. provides fiber based middle mile connectivity and high speed broadband internet service in communities that are within the applicant's proposed service area.

Submitter: Mark Twain Rural Telephone Company

Comment: The application submitted by Sho-Me Technologies, L.L.C. contains inaccurate and incomplete information and should be rejected, or in the alternative, amended appropriately. Sho-Me Technologies incorrectly classifies a significant portion of the proposed service area that is currently being served by Mark Twain as unserved and / or underserved as defined by the NOFA. Mark Twain responds by providing evidence and supporting documentation to prove that these areas served by Mark Twain are in fact adequately served with copper, wireless and / or fiber optic facilities. All communities and all subscribers in the designated areas served by Mark Twain have access to adequate and affordable middle mile transport facilities as well as last mile broadband service that exceeds 3 Mbps. As such, the proposed service area contained in the application that is currently served by Mark Twain should not be eligible for funding according to the rules and regulations posted by NTIA and RUS.

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:** DeKalb

Submitter: NPG CABLE INC.,

Comment: NPG Cable, Inc. currently provides sufficient broadband access and broadband services to end users and/or end user devices in the Service Area identified by the applicant below.” These services provide data rates that far exceed the underserved requirements set forth by BTOP/NITA, in addition NPG’s current wire solution scales to provide data rates that are unachievable through wireless solutions.

Submitter: Missouri Network Alliance, L.L.C.

Comment: Missouri Network Alliance, L.L.C. (MNA) is a "middle-mile" broadband services provider and an existing RUS borrower. As one of the early RUS Broadband Pilot Program loan fund recipients, MNA has deployed a "state-of-the-art" high capacity broadband network within the service area defined by the Applicant. The MNA network is a DWDM/SONET based network capable of supporting 40 wavelengths at 10 Gbps of capacity each. The applicant’s network deployment would be an unnecessary duplication of existing broadband infrastructure provided by a financial sound company owned by 15 rural independent telephone companies.

Submitter: CenturyLink

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

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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.”

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

Submitter: Semo Communications, Incorporated

Comment: Semo Communications, Incorporated advertises and provides high speed data service in speeds of up to 8 mbps download and 768 kbps upload in the proposed funded service area.

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:** Pike

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.

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-----**Service Area:** Clark

Submitter: Northeast Missouri Rural Telephone Company

Comment: Northeast Missouri Rural Telephone Company (NEMR) offers middle mile services to connect the communities of Unionville, Livonia, Worthington, Martinstown, Lemons, Pollock, Green City, Green Castle, Winigan, Milan, Novinger, Kirksville, Queen City, Memphis, Arbela, Rutledge and Luray, in the counties of Adair, Putnam, Sullivan, Schuyler, Scotland and Clark all in the State of Missouri. NEMR has a state-of-art SONET OC 192 transport network that connects all these communities and offers a capacity of 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. Further, NEMR is a member owner of the 14 ILEC member Missouri Network Alliance (MNA) network. This network covers much of Missouri and connects NEMR by this state-of-art fiber network and the other owners into the Kansas City Metro area where it connects with major Internet providers. NEMR has a 90 Mb data connection on MNA to redundant Internet POPs in Kansas City.

Based on the above factors, RUS/NTIA must reject the SHO-ME TECHNOLOGIES L.L.C. application. The public interest goals suggested by the proposed project are being accomplished using existing “middle-mile” infrastructure and 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 NEMR and its affiliated companies currently

provides (and will continue to provide) highly reliable, state-of-the-art services to the businesses and residents of these communities.

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.

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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:** Miller

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.

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.”

-----**Service Area:** Andrew

Submitter: NPG CABLE INC.,

Comment: NPG Cable, Inc. currently provides sufficient broadband access and broadband services to end users and/or end user devices in the Service Area identified by the applicant below.” These services provide data rates that far exceed the underserved requirements set forth by BTOP/NITA, in addition

NPG's current wire solution scales to provide data rates that are unachievable through wireless solutions.

Submitter: Grand River Mutual Tel.

Comment: Show Me Technologies' application covers part of Grand River Mutual Telephone Company's exchange. Grand River is capable of providing wireline broadband service to 100% of its customers throughout its territory. The majority of Grand River's customers receive service at 6.0 Mbps. Grand River's territory is neither unserved nor underserved.

Submitter: CenturyLink

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

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-----**Service Area:** Atchison

Submitter: IAMO Telephone CO

Comment: We can reach 100% of our customers with highspeed broadband service.

Submitter: Missouri Network Alliance, L.L.C.

Comment: Missouri Network Alliance, L.L.C. (MNA) is a "middle-mile" broadband services provider and an existing RUS borrower. As one of the early RUS Broadband Pilot Program loan fund recipients, MNA has deployed a "state-of-the-art" high capacity broadband network within the service area defined by the Applicant. The MNA network is a DWDM/SONET based network capable of supporting 40 wavelengths at 10 Gbps of capacity each. The applicant’s network deployment would be an unnecessary duplication of existing broadband infrastructure provided by a financial sound company owned by 15 rural independent telephone companies.

Submitter: Rock Port Telephone Company and Affiliates

Comment: Rock Port Telephone and its Affiliates strongly support President Obama's goal to prioritize funding for the areas of greatest need. In Northwest Missouri, the Missouri Governor's plan would not provide one new residence or business access to broadband service that they do not have today. Rock Port Telephone and its Affiliates have access to the middle mile from three different sources. These sources have POPs in Rock Port and provide multiple redundancy to our customers. Rock Port Telephone believes mapping should be done before money is spent in Missouri; that should be the first priority. That would prevent spending duplicate funds; monies that have already been invested by RUS or corporations. Such duplicate funding would weaken all involved.

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:** Caldwell

Submitter: Missouri Network Alliance, L.L.C.

Comment: Missouri Network Alliance, L.L.C. (MNA) is a "middle-mile" broadband services provider and an existing RUS borrower. As one of the early RUS Broadband Pilot Program loan fund recipients, MNA has deployed a "state-of-the-art" high capacity broadband network within the service area defined by the Applicant. The MNA network is a DWDM/SONET based network capable of supporting 40 wavelengths at 10 Gbps of capacity each. The applicant's network deployment would be an unnecessary duplication of existing broadband infrastructure provided by a financial sound company owned by 15 rural independent telephone companies.

Submitter: CenturyLink

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

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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.

Submitter: Green Hills Telephone Corp, dba: Green Hills Co's

Comment: Green Hills' and its Affiliates have access to the middle mile from two different sources (Iowa Network Services (INS) & Missouri Network Alliance (MNA)). Green Hills' could use these sources to achieve low cost redundant Broadband service to our last mile customers.

Submitter: Grand River Mutual Tel. / Lathrop Tel.

Comment: Show Me Technologies' application covers part of Grand River Mutual Telephone Company / Lathrop Telephone's exchange. Grand River is capable of providing wireline broadband service to 100% of its customers throughout its territory. The majority of Grand River's customers receive service at 6.0 Mbps. Grand River's territory is neither unserved nor underserved.

-----**Service Area:** New Madrid

Submitter: NewWave Communications

Comment: NewWave currently serves this area with 31% market penetration and offers 3 MG service to all.

Submitter: Semo Communications, Inc.

Comment: Semo Communications, Incorporated advertises and provides high speed data service in speeds of up to 8 mbps download and 768 kbps upload in the proposed funded service area.

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:** Shelby

Submitter: US Cable of Coastal-Texas, L.P.

Comment: US Cable of Coastal-Texas, L.P. provides fiber based middle mile connectivity and high speed broadband internet service in communities that are within the applicant's proposed service area.

Submitter: Mark Twain Rural Telephone Company

Comment: The application submitted by Sho-Me Technologies, L.L.C. contains inaccurate and incomplete information and should be rejected, or in the alternative, amended appropriately. Sho-Me Technologies incorrectly classifies a significant portion of the proposed service area that is currently being served by Mark Twain as unserved and / or underserved as defined by the NOFA. Mark Twain responds by providing evidence and supporting documentation to prove that these areas served by Mark Twain are in fact adequately served with copper, wireless and / or fiber optic facilities. All communities and all subscribers in the designated areas served by Mark Twain have access to adequate and affordable middle mile transport facilities as well as last mile broadband service that exceeds 3 Mbps. As such, the proposed service area contained in the application that is currently served by Mark Twain should not be eligible for funding according to the rules and regulations posted by NTIA and RUS.

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:** Chariton

Submitter: Missouri Network Alliance, L.L.C.

Comment: Missouri Network Alliance, L.L.C. (MNA) is a "middle-mile" broadband services provider and an existing RUS borrower. As one of the early RUS Broadband Pilot Program loan fund recipients, MNA has deployed a "state-of-the-art" high capacity broadband network within the service area defined by the Applicant. The MNA network is a DWDM/SONET based network capable of supporting 40 wavelengths at 10 Gbps of capacity each. The applicant's network deployment would be an unnecessary duplication of existing broadband infrastructure provided by a financial sound company owned by 15 rural independent telephone companies.

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.”

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.

Submitter: Chariton Telcom

Comment: Chariton Valley Telephone currently provides broadband access capability to 100% of the households within the area of the proposed funded serving area indicated "PFSA" challenged area. Chariton Valley Telephone is a rural ILEC that has been serving the area for some time. In the challenged PFSA they currently offer ADSL broadband and FTTH broadband data services. As of June 2009 they are serving broadband customers within this area or 16.69% of the households with Broadband. Chariton Valley Telephone offers speeds of over 3Mbps throughout this area. All of the wireline customers have 768Kbps or above access speeds in this area. Therefore by any of the

definitions of the ARRA broadband program this area does not qualify as unserved and 3Mbps speeds are available throughout the challenge area.

-----**Service Area:** Dent

Submitter: Fidelity Communications Co. and subsidiaries

Comment: Fidelity is a CLEC, cable TV and internet service provider, who serves a portion of the Applicant's proposed funded middle mile service area within the city limits of Salem, Missouri and some surrounding areas of Dent County, Missouri. Fidelity has built a robust hybrid fiber/coax network providing a large number of subscribers with a package of voice, video and broadband services. Fidelity has provided broadband service via cable modems in this area since 2007 with current speeds up to 15 Mbps.

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

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.

Submitter: Missouri Network Alliance, L.L.C.

Comment: Missouri Network Alliance, L.L.C. (MNA) is a "middle-mile" broadband services provider and an existing RUS borrower. As one of the early RUS Broadband Pilot Program loan fund recipients, MNA has deployed a "state-of-the-art" high capacity broadband network within the service area defined by the Applicant. The MNA network is a DWDM/SONET based network capable of supporting 40 wavelengths at 10 Gbps of capacity each. The applicant's network deployment would be an unnecessary

duplication of existing broadband infrastructure provided by a financial sound company owned by 15 rural independent telephone companies.

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.

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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.

Submitter: Imagination Inc dba I-Land Internet Services

Comment: Imagination Inc, dba I-Land Internet Services, respectfully requests that the services we offer and the customers we serve are considered in determining funding for this application. We offer point-to-point wireless broadband service and DSL in numerous areas throughout Missouri, including areas within this application, and are continually expanding our service areas. We have been providing broadband service for over five years and deployed WiMax service in the past year. We currently provide broadband service to well over 3,000 customers, and those customer numbers will only continue to grow significantly as we expand our service areas. We are committed to investing in our networks in order to provide broadband service to both our existing and future customers.

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.”

-----**Service Area:** Montgomery

Submitter: Kingdom Telephone Company

Comment: Kingdom Telephone Company is capable of providing broadband at speeds of at 4.0 Mbps downstream and 512K Kbps upstream to 100% of its customers in all of its exchanges where Sho-Me Technologies’ application overlaps Kingdom’s service territory. Over 90% of Kingdom’s broadband customers receive service at 1.0 Mbps or higher. Kingdom’s territory is neither unserved nor underserved.

Submitter: New Florence Telephone Company

Comment: New Florence Telephone Company is capable of providing broadband speeds up to 1.5mbps downstream and 512kbps upstream to 100% of its local exchange territory. It appears that SHO-ME Technologies' application overlaps the company's exchange service area that includes the community of New Florence and New Florence Telephone believes that its' service area is neither unserved or underserved.

Submitter: CenturyLink

Comment: Respondent's Summary (Not confidential)

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.

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.

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-----**Service Area:** Washington

Submitter: Fidelity Communications Co. and subsidiaries

Comment: Fidelity Telephone Co., a wholly-owned subsidiary of Fidelity Communications Co., is an ILEC providing telecommunications services in a portion of the Applicant's middle mile proposed funded service area in Washington County, Missouri. Fidelity has provided quality service in rural exchanges since the 1940's and has built a robust broadband network, providing DSL services since 2002 at current speeds up to 5 Mbps.

Submitter: CenturyLink

Comment: Respondent’s Summary (Not confidential)

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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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:** Shannon

Submitter: Ellington Telephone Company, Inc.

Comment: Ellington Telephone Company provides DSL Broadband Service (at speeds of at least 768 Kbps downstream and 200 Kbps upstream) that is available to more than 95% of the households within the Sho-Me Technologies L.L.C. proposed funded service area application overlapping Ellington Tel's exchange area boundaries. Forty percent (40%) of Ellington Tel's telephone service customers currently subscribe to Ellington Tel's Broadband Service; and, the majority of Ellington Tel's Broadband customers can receive downstream speeds of 3 Mbps or higher.

Submitter: CenturyLink

Comment: Respondent's Summary (Not confidential)

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:** Polk

Submitter: American Broadband Humansville Cable Modem

Comment: N.W. Communications is an incumbent cable television provider with municipal franchise authority to offer cable television service in 11 communities in western Missouri. N.W. Communications offers broadband internet and data services utilizing cable modem technology. N.W. Communications offers broadband services at speeds that meet and exceed the minimum download (768 Kbps) and upload (200 Kbps) speeds defined in the NOFA. N.W. Communications does business as (dba) American Broadband in Missouri. This specific response is from the perspective of the cable modem broadband service that is offered within the municipal franchised areas that overlap with the SHOW-ME Technologies, L.L. C. Middle/ Last Mile Stimulus Application in Polk County, Missouri. N.W. Communications (dba American Broadband) advertises broadband service alternatives that meet and exceed minimum download and upload speeds defined in the NOFA.

N.W. Communications enjoys broadband penetration rates that exceed 40% of households in many of census blocks contained within its serving areas, and this does not count/include the penetration of Century, which is the ILEC in community of Humansville (where this application overlaps N.W. Communications), or other broadband competitors that operate in the service area that SHOW-ME Technologies L.L.C. has applied for.

SHOW-ME Technologies L.L.C. has submitted a broadband stimulus application that overlaps N.W. Communications serving areas. The SHOW-ME Technologies L.L.C. application overlaps with 101 census blocks in which N.W. Communications offers cable modem broadband speeds. In these 101 census blocks, N.W. Communications provides broadband service to 38 residential customers and 3 business customers. N.W. Communications approaches 10% penetration amongst residences all by itself and this does not include the number of residences served by Century and other broadband competitors. Thus, the overlap area in the SHOW-ME Technologies L.L.C. application is not unserved and it is not underserved. Furthermore, N.W. Communications offers its cable modem broadband service at speeds that exceed the NOFA minimums and exceed 3 Mbps, and N.W. Communications (doing business as American Broadband) advertises speeds that exceed 3 Mbps.

The SHOW-ME Technologies L.L.C. stimulus application should be rejected for several reasons, which include but are not limited to:

1. SHOW-ME Technologies L.L.C. applied for Stimulus dollars in areas (Census Blocks) that are not unserved or underserved.

2. The SHOW-ME Technologies L.L.C. application is overly broad because it did not seek to perform validations of broadband penetration rates at the Census Block level, whereas N.W. Communications currently provides, advertises, and tracks broadband penetration to the Census Block level within its designated serving areas.

3. Broadband stimulus dollars should not be directed to areas that do not meet the definitions of unserved or underserved territory.

4. SHOW-ME Technologies L.L.C. proposes a wireless technology solution for the last mile portion of its application in rural communities using 200 foot towers. Only Fiber-to-the-Premise solutions offer a long term future-proof solution for meeting the challenge of a rapidly increasing definition of minimum download and upload speeds. SHOW-ME Technologies L.L.C. is only one of several wireless providers within the geography applied for that already offer data services over their wireless networks (Verizon, AllTel, Sprint, AT&T, etc.). Furthermore, the middle mile portion of the application is largely redundant with respect to the fact that the Missouri Network Alliance (MNA) already has a robust fiber optic middle mile infrastructure that is already in place across vast sections of the state of Missouri.

5. SHOW-ME Technologies L.L.C.'s application overlaps with the designated service areas of N.W. Communications. It is not apparent that SHOW-ME Technologies L.L.C. has addressed the challenge of its application's ability to be economically sustainable in areas that lack population density, and are already populated with multiple providers.

6. Beyond initial network deployment, wireless infrastructure solutions have not demonstrated the ability to create sustained employment opportunities within the immediate service area. This is contrasted by the fact that N.W. Communications has a resident work force, located within its designated serving areas in western Missouri, and it has a history of sustained employment.

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.”

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

Submitter: US Cable of Coastal-Texas, L.P.

Comment: US Cable of Coastal-Texas, L.P. provides fiber based middle mile connectivity and high speed broadband internet service in communities that are within the applicant's proposed service area.

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.

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.

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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.”

Submitter: Chariton Valley Telephone

Comment: Chariton Valley Telephone currently provides broadband access capability to 80% of the households within the area of the proposed funded serving area indicated “PFSA” challenged area. Chariton Valley Telephone is a rural ILEC that has been serving the area for some time. In the challenged PFSA they currently offer ADSL broadband and FTTH broadband data services. As of June 2009 they are serving broadband customers within this area or 8.3% of the households with Broadband. Chariton Valley Telephone offers speeds of over 3Mbps throughout this area. All of the wireline customers have 768Kbps or above access speeds in this area. Therefore by any of the definitions of the ARRA broadband program this area does not qualify as unserved and 3Mbps speeds are available throughout the challenge area.

-----**Service Area:** Boone

Submitter: US Cable of Coastal-Texas, L.P.

Comment: US Cable of Coastal-Texas, L.P. provides fiber based middle mile connectivity and high speed broadband internet service in communities that are within the applicant's proposed service area.

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.

Submitter: CenturyLink

Comment: 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. We attach a representative sample of areas where the application overlaps our existing broadband deployment. This data is not exhaustive; the application may include other areas also currently served with broadband by CenturyLink or other providers. We will provide additional information on request if that will further assist the agency's review.

CenturyLink also provides data showing broadband availability in local telephone exchanges within the proposed service areas. This includes areas served by CenturyLink and/or other broadband providers. This data further shows the applicant would duplicate and overlap existing broadband services in the proposed service areas.

-----**Service Area:** Iron

Submitter: CenturyLink

Comment: Respondent's Summary (Not confidential)

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.

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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:** Reynolds

Submitter: Ellington Telephone Company, Inc.

Comment: Ellington Telephone Company provides DSL Broadband Service (at speeds of at least 768 Kbps downstream and 200 Kbps upstream) that is available to more than 95% of the households within the Sho-Me Technologies L.L.C. proposed funded service area application overlapping Ellington Tel's exchange area boundaries. Forty percent (40%) of Ellington Tel's telephone service customers currently subscribe to Ellington Tel's Broadband Service; and, the majority of Ellington Tel's Broadband customers can receive downstream speeds of 3 Mbps or higher.

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.

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-----**Service Area:** Dallas

Submitter: CenturyLink

Comment: Respondent's Summary (Not confidential)

The proposed service areas are not wholly underserved or unserved.

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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.

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.

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-----**Service Area:** Camden

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:** Cole

Submitter: Missouri Network Alliance, L.L.C.

Comment: Missouri Network Alliance, L.L.C. (MNA) is a "middle-mile" broadband services provider and an existing RUS borrower. As one of the early RUS Broadband Pilot Program loan fund recipients, MNA has deployed a "state-of-the-art" high capacity broadband network within the service area defined by the Applicant. The MNA network is a DWDM/SONET based network capable of supporting 40 wavelengths at 10 Gbps of capacity each. The applicant's network deployment would be an unnecessary duplication of existing broadband infrastructure provided by a financial sound company owned by 15 rural independent telephone companies.

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.

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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:** Putnam

Submitter: Grand River Mutual Tel.

Comment: Show Me Technologies' application covers part of Grand River Mutual Telephone Company's exchange. Grand River is capable of providing wireline broadband service to 100% of its customers throughout its territory. The majority of Grand River's customers receive service at 6.0 Mbps. Grand River's territory is neither unserved nor underserved.

Submitter: Northeast Missouri Rural Telephone Company

Comment: Northeast Missouri Rural Telephone Company (NEMR) offers middle mile services to connect the communities of Unionville, Livonia, Worthington, Martinstown, Lemons, Pollock, Green City, Green Castle, Winigan, Milan, Novinger, Kirksville, Queen City, Memphis, Arbela, Rutledge and Luray, in the counties of Adair, Putnam, Sullivan, Schuyler, Scotland and Clark all in the State of Missouri. NEMR has a state-of-art SONET OC 192 transport network that connects all these communities and offers a capacity of 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. Further, NEMR is a member owner of the 14 ILEC member Missouri Network Alliance (MNA) network. This network covers much of Missouri and connects NEMR by this state-of-art fiber network and the other owners into the Kansas City Metro area where it connects with major Internet providers. NEMR has a 90 Mb data connection on MNA to redundant Internet POPs in Kansas City.

Based on the above factors, RUS/NTIA must reject the SHO-ME TECHNOLOGIES L.L.C. application. The public interest goals suggested by the proposed project are being accomplished using existing "middle-mile" infrastructure and 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 NEMR and its affiliated companies currently provides (and will continue to provide) highly reliable, state-of-the-art services to the businesses and residents of these communities.

Submitter: Missouri Network Alliance, L.L.C.

Comment: Missouri Network Alliance, L.L.C. (MNA) is a "middle-mile" broadband services provider and an existing RUS borrower. As one of the early RUS Broadband Pilot Program loan fund recipients, MNA has deployed a "state-of-the-art" high capacity broadband network within the service area defined by the Applicant. The MNA network is a DWDM/SONET based network capable of supporting 40 wavelengths at 10 Gbps of capacity each. The applicant's network deployment would be an unnecessary duplication of existing broadband infrastructure provided by a financial sound company owned by 15 rural independent telephone companies.

-----**Service Area:** Stoddard

Submitter: NewWave Communications

Comment: NewWave currently serves this area with 42% market penetration. NewWave also offers 100% availability of 3 MG service. In addition, according to data compiled by the Media Business Corporation, an independent research firm, NewWave and its digital subscriber line competitors serve over 40% of homes passed in this particular market. As a result, this market is adequately serviced by NewWave and its competitors.

Submitter: Semo Communications, Inc.

Comment: Semo Communications, Incorporated advertises and provides high speed data service in speeds of up to 8 mbps download and 768 kbps upload in the proposed funded service area.

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

Submitter: NPG CABLE INC.,

Comment: NPG Cable, Inc. currently provides sufficient broadband access and broadband services to end users and/or end user devices in the Service Area identified by the applicant below." These services provide data rates that far exceed the underserved requirements set forth by BTOP/NITA, in addition NPG's current wire solution scales to provide data rates that are unachievable through wireless solutions.

Submitter: Missouri Network Alliance, L.L.C.

Comment: Missouri Network Alliance, L.L.C. (MNA) is a "middle-mile" broadband services provider and an existing RUS borrower. As one of the early RUS Broadband Pilot Program loan fund recipients, MNA has deployed a "state-of-the-art" high capacity broadband network within the service area defined by the Applicant. The MNA network is a DWDM/SONET based network capable of supporting 40 wavelengths at 10 Gbps of capacity each. The applicant's network deployment would be an unnecessary duplication of existing broadband infrastructure provided by a financial sound company owned by 15 rural independent telephone companies.

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.

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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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Submitter: Grand River Mutual Tel / Lathrop Tel

Comment: Show Me Tel's application covers part of Grand River Mutual Telephone Company / Lathrop Telephone's exchange. Grand River is capable of providing wireline broadband service to 100% of its customers throughout its territory. The majority of Grand River's customers receive service at 6.0 Mbps. Grand River's territory is neither unserved nor underserved.

-----**Service Area:** Grundy

Submitter: Grand River Mutual Tel.

Comment: Show Me Technologies' application covers part of Grand River Mutual Telephone Company's exchange. Grand River is capable of providing wireline broadband service to 100% of its

customers throughout its territory. The majority of Grand River's customers receive service at 6.0 Mbps. Grand River's territory is neither unserved nor underserved.

Submitter: Missouri Network Alliance, L.L.C.

Comment: Missouri Network Alliance, L.L.C. (MNA) is a "middle-mile" broadband services provider and an existing RUS borrower. As one of the early RUS Broadband Pilot Program loan fund recipients, MNA has deployed a "state-of-the-art" high capacity broadband network within the service area defined by the Applicant. The MNA network is a DWDM/SONET based network capable of supporting 40 wavelengths at 10 Gbps of capacity each. The applicant's network deployment would be an unnecessary duplication of existing broadband infrastructure provided by a financial sound company owned by 15 rural independent telephone companies.

-----**Service Area:** Gentry

Submitter: Missouri Network Alliance, L.L.C.

Comment: Missouri Network Alliance, L.L.C. (MNA) is a "middle-mile" broadband services provider and an existing RUS borrower. As one of the early RUS Broadband Pilot Program loan fund recipients, MNA has deployed a "state-of-the-art" high capacity broadband network within the service area defined by the Applicant. The MNA network is a DWDM/SONET based network capable of supporting 40 wavelengths at 10 Gbps of capacity each. The applicant's network deployment would be an unnecessary duplication of existing broadband infrastructure provided by a financial sound company owned by 15 rural independent telephone companies.

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.

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Submitter: Grand River Mutual Tel.

Comment: Show Me Technologies’ application covers part of Grand River Mutual Telephone Company's exchange. Grand River is capable of providing wireline broadband service to 100% of its customers throughout its territory. The majority of Grand River’s customers receive service at 6.0 Mbps. Grand River’s territory is neither unserved nor underserved.

-----**Service Area:** Butler

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.”

Submitter: Boycom Cablevision Inc.

Comment: Boycom Cablevision Inc. currently offers high speed data services in it's Butler county and Wappapello systems in excess of 3 Mbps Downstream and up to 1 Mbps upstream. Boycom Cablevision Inc. is also a borrower in the RUS Broadband loan program and currently has an upgrade project in progress using the RUS loan program funding. The upgrade will cover its Butler county, Wappapello,

Puxico, Fisk and Qulin MO service areas. Once completed it will allow high speed data services in excess of 10 Mbps Downstream and 3 Mbps Upstream.

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

Submitter: Missouri Network Alliance, L.L.C.

Comment: Missouri Network Alliance, L.L.C. (MNA) is a "middle-mile" broadband services provider and an existing RUS borrower. As one of the early RUS Broadband Pilot Program loan fund recipients, MNA has deployed a "state-of-the-art" high capacity broadband network within the service area defined by the Applicant. The MNA network is a DWDM/SONET based network capable of supporting 40 wavelengths at 10 Gbps of capacity each. The applicant's network deployment would be an unnecessary duplication of existing broadband infrastructure provided by a financial sound company owned by 15 rural independent telephone companies.

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.

Submitter: Green Hills Telephone Corp, dba: Green Hills Co's

Comment: Green Hills' and its Affiliates have access to the middle mile from two different sources (Iowa Network Services (INS) & Missouri Network Alliance (MNA)). Green Hills' could use these sources to achieve low cost redundant Broadband service to our last mile customers.

Submitter: Chariton Valley Telephone

Comment: Chariton Valley Telephone currently provides broadband access capability to 95% of the households within the area of the proposed funded serving area indicated "PFSA" challenged area. Chariton Valley Telephone is a rural ILEC that has been serving the area for some time. In the challenged PFSA they currently offer ADSL broadband and FTTH broadband data services. As of June 2009 they are serving broadband customers within this area or 8% of the households with Broadband. Chariton Valley Telephone offers speeds of over 3Mbps throughout this area. All of the wireline customers have 768Kbps or above access speeds in this area. Therefore by any of the definitions of the ARRA broadband program this area does not qualify as unserved and 3Mbps speeds are available throughout the challenge area.

-----**Service Area:** Dunklin

Submitter: NewWave Communications

Comment: NewWave currently serves this area with 26% market penetration and 3 MG service available to all.

-----**Service Area:** Johnson

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.

Submitter: Missouri Network Alliance, L.L.C.

Comment: Missouri Network Alliance, L.L.C. (MNA) is a "middle-mile" broadband services provider and an existing RUS borrower. As one of the early RUS Broadband Pilot Program loan fund recipients, MNA

has deployed a "state-of-the-art" high capacity broadband network within the service area defined by the Applicant. The MNA network is a DWDM/SONET based network capable of supporting 40 wavelengths at 10 Gbps of capacity each. The applicant's network deployment would be an unnecessary duplication of existing broadband infrastructure provided by a financial sound company owned by 15 rural independent telephone companies.

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:** St. Francois

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:** Hickory

Submitter: American Broadband Wheatland cable modem

Comment: N.W. Communications is an incumbent cable television provider with municipal franchise authority to offer cable television service in 11 communities in western Missouri. N.W. Communications offers broadband internet and data services utilizing cable modem technology. N.W. Communications

offers broadband services at speeds that meet and exceed the minimum download (768 Kbps) and upload (200 Kbps) speeds defined in the NOFA. N.W. Communications does business as (dba) American Broadband in Missouri. This specific response is from the perspective of the cable modem broadband service that is offered within the municipal franchised areas that overlap with the SHOW-ME Technologies, L.L. C. Middle/ Last Mile Stimulus Application in Hickory County, Missouri. N.W. Communications (dba American Broadband) advertises broadband service alternatives that meet and exceed minimum download and upload speeds defined in the NOFA.

N.W. Communications enjoys healthy broadband penetration rates in many of census blocks contained within its serving areas, and this does not count/include the penetration of Century, which is the ILEC in Hickory County (where this application overlaps N.W. Communications), or other broadband competitors that operate in the service area that SHOW-ME Technologies L.L.C. has applied for.

The SHOW-ME Technologies L.L.C. application overlaps with 377 census blocks in which N.W. Communications offers cable modem broadband speeds. In these 377 census blocks, N.W. Communications provides broadband service to 158 residential customers and 12 business customers. N.W. Communications approaches 10% penetration amongst residences all by itself and this does not include the number of residences served by Century and other broadband competitors. Thus, the overlap area in the SHOW-ME Technologies L.L.C. application is not unserved and it is not underserved. Furthermore, N.W. Communications offers its cable modem broadband service at speeds that exceed the NOFA minimums and exceed 3 Mbps, and N.W. Communications (doing business as American Broadband) advertises speeds that exceed 3 Mbps.

The SHOW-ME Technologies L.L.C. stimulus application should be rejected for several reasons, which include but are not limited to:

1. SHOW-ME Technologies L.L.C. applied for Stimulus dollars in areas (Census Blocks) that are not unserved or underserved.
2. The SHOW-ME Technologies L.L.C. application is overly broad because it did not seek to perform validations of broadband penetration rates at the Census Block level, whereas N.W. Communications currently provides, advertises, and tracks broadband penetration to the Census Block level within its designated serving areas.
3. Broadband stimulus dollars should not be directed to areas that do not meet the definitions of unserved or underserved territory.
4. SHOW-ME Technologies L.L.C. proposes a wireless technology solution for the last mile portion of its application in rural communities using 200 foot towers. Only Fiber-to-the-Premise solutions offer a long term future-proof solution for meeting the challenge of a rapidly increasing definition of minimum download and upload speeds. SHOW-ME Technologies L.L.C. is only one of several wireless providers within the geography applied for that already offer data services over their wireless networks (Verizon, AllTel, Sprint, AT&T, etc.). Furthermore, the middle mile portion of the application is largely redundant

with respect to the fact that the Missouri Network Alliance (MNA) already has a robust fiber optic middle mile infrastructure that is already in place across vast sections of the state of Missouri.

5.SHOW-ME Technologies L.L.C.'s application overlaps with the designated service areas of N.W. Communications. It is not apparent that SHOW-ME Technologies L.L.C. has addressed the challenge of its application's ability to be economically sustainable in areas that lack population density, and are already populated with multiple providers.

6.Beyond initial network deployment, wireless infrastructure solutions have not demonstrated the ability to create sustained employment opportunities within the immediate service area. This is contrasted by the fact that N.W. Communications has a resident work force, located within its designated serving areas in western Missouri, and it has a history of sustained employment.

-----**Service Area:** Lewis

Submitter: Mark Twain Rural Telephone Company

Comment: The application submitted by Sho-Me Technologies, L.L.C. contains inaccurate and incomplete information and should be rejected, or in the alternative, amended appropriately. Sho-Me Technologies incorrectly classifies a significant portion of the proposed service area that is currently being served by Mark Twain as unserved and / or underserved as defined by the NOFA. Mark Twain responds by providing evidence and supporting documentation to prove that these areas served by Mark Twain are in fact adequately served with copper, wireless and / or fiber optic facilities. All communities and all subscribers in the designated areas served by Mark Twain have access to adequate and affordable middle mile transport facilities as well as last mile broadband service that exceeds 3 Mbps. As such, the proposed service area contained in the application that is currently served by Mark Twain should not be eligible for funding according to the rules and regulations posted by NTIA and RUS.

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:** Callaway

Submitter: Missouri Network Alliance, L.L.C.

Comment: Missouri Network Alliance, L.L.C. (MNA) is a "middle-mile" broadband services provider and an existing RUS borrower. As one of the early RUS Broadband Pilot Program loan fund recipients, MNA has deployed a "state-of-the-art" high capacity broadband network within the service area defined by the Applicant. The MNA network is a DWDM/SONET based network capable of supporting 40 wavelengths at 10 Gbps of capacity each. The applicant's network deployment would be an unnecessary duplication of existing broadband infrastructure provided by a financial sound company owned by 15 rural independent telephone companies.

Submitter: Kingdom Telephone Company

Comment: Kingdom Telephone Company is capable of providing broadband at speeds of at 4.0 Mbps downstream and 512K Kbps upstream to 100% of its customers in all of its exchanges where Sho-Me Technologies' application overlaps Kingdom's service territory. Over 90% of Kingdom's broadband customers receive service at 1.0 Mbps or higher. Kingdom's territory is neither unserved nor underserved.

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:** Laclede

Submitter: Fidelity Communications Co. and subsidiaries

Comment: Fidelity is a CLEC, cable TV and internet service provider, who serves a portion of the Applicant's proposed funded middle mile service area within the city limits of Lebanon, Missouri and some surrounding areas of Laclede County, Missouri. Fidelity has built a robust hybrid fiber/coax network providing a large number of subscribers with a package of voice, video and broadband services. Fidelity has provided broadband service via cable modems in this area since 2006 with current speeds up to 15 Mbps.

Submitter: CenturyLink

Comment: Respondent's Summary (Not confidential)

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.

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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:** Ralls

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.

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CenturyLink has committed to upgrade and extend broadband.

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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:** Wayne

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.”

-----**Service Area:** Pulaski

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.”

-----**Service Area:** Knox

Submitter: Mark Twain Rural Telephone Company

Comment: The application submitted by Sho-Me Technologies, L.L.C. contains inaccurate and incomplete information and should be rejected, or in the alternative, amended appropriately. Sho-Me Technologies incorrectly classifies a significant portion of the proposed service area that is currently being served by Mark Twain as unserved and / or underserved as defined by the NOFA. Mark Twain responds by providing evidence and supporting documentation to prove that these areas served by Mark Twain are in fact adequately served with copper, wireless and / or fiber optic facilities. All communities and all subscribers in the designated areas served by Mark Twain have access to adequate and affordable middle mile transport facilities as well as last mile broadband service that exceeds 3 Mbps. As such, the proposed service area contained in the application that is currently served by Mark Twain should not be eligible for funding according to the rules and regulations posted by NTIA and RUS.

Submitter: Northeast Missouri Rural Telephone Company

Comment: The application submitted by SHO-ME TECHNOLOGIES L.L.C. contains inaccurate and incomplete information for the proposed funded service area. Northeast Missouri Rural Telephone Company (NEMR) demonstrates that it provides broadband service with download speeds greater than 768K to 100% of the households and businesses located within its service territory. As such, this area is “SERVED” based on the definitions as established in the Notice of Funds Availability (NOFA). In this public notice response NEMR is providing; 1) a map of the overlapping area where NEMR provides broadband services, 2) NEMR’s DSL high speed Internet advertising 3) the number of residential households and business establishments capable of receiving broadband services from NEMR within our service area, 4) the number of residential households and business establishments subscribing to our

broadband, 5) the advertised download and upload speeds and service rates, and 6) comments addressing the existing services offered within the proposed funded service area.

Submitter: Missouri Network Alliance, L.L.C.

Comment: Missouri Network Alliance, L.L.C. (MNA) is a "middle-mile" broadband services provider and an existing RUS borrower. As one of the early RUS Broadband Pilot Program loan fund recipients, MNA has deployed a "state-of-the-art" high capacity broadband network within the service area defined by the Applicant. The MNA network is a DWDM/SONET based network capable of supporting 40 wavelengths at 10 Gbps of capacity each. The applicant's network deployment would be an unnecessary duplication of existing broadband infrastructure provided by a financial sound company owned by 15 rural independent telephone companies.

-----**Service Area:** Pemiscot

Submitter: NewWave Communications

Comment: NewWave currently serve this area with a 12% market penetration. NewWave offers 3 MG service to all.

-----**Service Area:** Texas

Submitter: Cable America Missouri LLC

Comment: CableAmerica currently provides Broadband Internet speeds of 5.2Mbps download and 512Kbps upload.

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:** Moniteau

Submitter: Missouri Network Alliance, L.L.C.

Comment: Missouri Network Alliance, L.L.C. (MNA) is a "middle-mile" broadband services provider and an existing RUS borrower. As one of the early RUS Broadband Pilot Program loan fund recipients, MNA has deployed a "state-of-the-art" high capacity broadband network within the service area defined by the Applicant. The MNA network is a DWDM/SONET based network capable of supporting 40 wavelengths at 10 Gbps of capacity each. The applicant's network deployment would be an unnecessary duplication of existing broadband infrastructure provided by a financial sound company owned by 15 rural independent telephone companies.

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.

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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.

Submitter: Imagination Inc dba I-Land Internet Services

Comment: Imagination Inc, dba I-Land Internet Services, respectfully requests that the services we offer and the customers we serve are considered in determining funding for this application. We offer point-to-point wireless broadband service and DSL in numerous areas throughout Missouri, including

areas within this application, and are continually expanding our service areas. We have been providing broadband service for over five years and deployed WiMax service in the past year. We currently provide broadband service to well over 3,000 customers, and those customer numbers will only continue to grow significantly as we expand our service areas. We are committed to investing in our networks in order to provide broadband service to both our existing and future customers.

-----**Service Area:** Ray

Submitter: Green Hills Telephone Corp, dba: Green Hills Co's

Comment: Green Hills' and its Affiliates have access to the middle mile from two different sources (Iowa Network Services (INS) & Missouri Network Alliance (MNA)). Green Hills' could use these sources to achieve low cost redundant Broadband service to our last mile customers.

-----**Service Area:** Harrison

Submitter: Grand River Mutual Tel.

Comment: Show Me Technologies' application covers part of Grand River Mutual Telephone Company's exchange. Grand River is capable of providing wireline broadband service to 100% of its customers throughout its territory. The majority of Grand River's customers receive service at 6.0 Mbps. Grand River's territory is neither unserved nor underserved.

Submitter: Missouri Network Alliance, L.L.C.

Comment: Missouri Network Alliance, L.L.C. (MNA) is a "middle-mile" broadband services provider and an existing RUS borrower. As one of the early RUS Broadband Pilot Program loan fund recipients, MNA has deployed a "state-of-the-art" high capacity broadband network within the service area defined by the Applicant. The MNA network is a DWDM/SONET based network capable of supporting 40 wavelengths at 10 Gbps of capacity each. The applicant's network deployment would be an unnecessary duplication of existing broadband infrastructure provided by a financial sound company owned by 15 rural independent telephone companies.

-----**Service Area:** Livingston

Submitter: Grand River Mutual Tel.

Comment: Show Me Technologies' application covers part of Grand River Mutual Telephone Company's exchange. Grand River is capable of providing wireline broadband service to 100% of its customers throughout its territory. The majority of Grand River's customers receive service at 6.0 Mbps. Grand River's territory is neither unserved nor underserved.

Submitter: Missouri Network Alliance, L.L.C.

Comment: Missouri Network Alliance, L.L.C. (MNA) is a "middle-mile" broadband services provider and an existing RUS borrower. As one of the early RUS Broadband Pilot Program loan fund recipients, MNA has deployed a "state-of-the-art" high capacity broadband network within the service area defined by the Applicant. The MNA network is a DWDM/SONET based network capable of supporting 40 wavelengths at 10 Gbps of capacity each. The applicant's network deployment would be an unnecessary duplication of existing broadband infrastructure provided by a financial sound company owned by 15 rural independent telephone companies.

Submitter: Green Hills Telephone Corp, dba: Green Hills Co's

Comment: Green Hills' and its Affiliates have access to the middle mile from two different sources (Iowa Network Services (INS) & Missouri Network Alliance (MNA)). Green Hills' could use these sources to achieve low cost redundant Broadband service to our last mile customers.

Submitter: Chariton Valley Telephone

Comment: Chariton Valley Telephone currently provides broadband access capability to 95% of the households within the area of the proposed funded serving area indicated "PFSA" challenged area. Chariton Valley Telephone is a rural ILEC that has been serving the area for some time. In the challenged PFSA they currently offer ADSL broadband and FTTH broadband data services. As of June 2009 they are serving broadband customers within this area or 42% of the households with Broadband. Chariton Valley Telephone offers speeds of over 3Mbps throughout this area. All of the wireline customers have 768Kbps or above access speeds in this area. Therefore by any of the definitions of the

ARRA broadband program this area does not qualify as unserved and 3Mbps speeds are available throughout the challenge area.

-----**Service Area:** Ste. Genevieve

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:** Phelps

Submitter: Fidelity Communications Co. and subsidiaries

Comment: Fidelity is a CLEC, cable TV and internet service provider, who serves a portion of the Applicant's proposed funded middle mile service area within the city limits of Rolla, Missouri and some surrounding areas of Phelps County, Missouri. Fidelity has built a robust hybrid fiber/coax network providing a large number of subscribers with a package of voice, video and broadband services. Fidelity has provided broadband service via cable modems since 2000 with current speeds up to 5 Mbps.

Submitter: Missouri Network Alliance, L.L.C.

Comment: Missouri Network Alliance, L.L.C. (MNA) is a "middle-mile" broadband services provider and an existing RUS borrower. As one of the early RUS Broadband Pilot Program loan fund recipients, MNA has deployed a "state-of-the-art" high capacity broadband network within the service area defined by the Applicant. The MNA network is a DWDM/SONET based network capable of supporting 40 wavelengths at 10 Gbps of capacity each. The applicant's network deployment would be an unnecessary duplication of existing broadband infrastructure provided by a financial sound company owned by 15 rural independent telephone companies.

Submitter: Cable America Missouri LLC

Comment: CableAmerica currently provides Broadband Internet speeds of 5.2Mbps download and 512Kbps upload.

Submitter: CenturyLink

Comment: 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. We attach a representative sample of areas where the application overlaps our existing broadband deployment. This data is not exhaustive; the application may include other areas also currently served with broadband by CenturyLink or other providers. We will provide additional information on request if that will further assist the agency's review.

CenturyLink also provides data showing broadband availability in local telephone exchanges within the proposed service areas. This includes areas served by CenturyLink and/or other broadband providers. This data further show the applicant would duplicate and overlap existing 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 7 million access lines and 2.1 million broadband customers in 33 states.

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.”

-----**Service Area:** Adair

Submitter: Mark Twain Rural Telephone Company

Comment: The application submitted by Sho-Me Technologies, L.L.C. contains inaccurate and incomplete information and should be rejected, or in the alternative, amended appropriately. Sho-Me Technologies incorrectly classifies a significant portion of the proposed service area that is currently being served by Mark Twain as unserved and / or underserved as defined by the NOFA. Mark Twain responds by providing evidence and supporting documentation to prove that these areas served by Mark Twain are in fact adequately served with copper, wireless and / or fiber optic facilities. All communities and all subscribers in the designated areas served by Mark Twain have access to adequate and affordable middle mile transport facilities as well as last mile broadband service that exceeds 3 Mbps. As such, the proposed service area contained in the application that is currently served by Mark Twain should not be eligible for funding according to the rules and regulations posted by NTIA and RUS.

Submitter: Northeast Missouri Rural Telephone Company

Comment: Northeast Missouri Rural Telephone Company (NEMR) offers middle mile services to connect the communities of Unionville, Livonia, Worthington, Martinstown, Lemons, Pollock, Green City, Green Castle, Winigan, Milan, Novinger, Kirksville, Queen City, Memphis, Arbela, Rutledge and Luray, in the counties of Adair, Putnam, Sullivan, Schuyler, Scotland and Clark all in the State of Missouri. NEMR has a state-of-art SONET OC 192 transport network that connects all these communities and offers a capacity of 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. Further, NEMR is a member owner

of the 14 ILEC member Missouri Network Alliance (MNA) network. This network covers much of Missouri and connects NEMR by this state-of-art fiber network and the other owners into the Kansas City Metro area where it connects with major Internet providers. NEMR has a 90 Mb data connection on MNA to redundant Internet POPs in Kansas City.

Based on the above factors, RUS/NTIA must reject the SHO-ME TECHNOLOGIES L.L.C. application. The public interest goals suggested by the proposed project are being accomplished using existing "middle-mile" infrastructure and 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 NEMR and its affiliated companies currently provides (and will continue to provide) highly reliable, state-of-the-art services to the businesses and residents of these communities.

Submitter: Missouri Network Alliance, L.L.C.

Comment: Missouri Network Alliance, L.L.C. (MNA) is a "middle-mile" broadband services provider and an existing RUS borrower. As one of the early RUS Broadband Pilot Program loan fund recipients, MNA has deployed a "state-of-the-art" high capacity broadband network within the service area defined by the Applicant. The MNA network is a DWDM/SONET based network capable of supporting 40 wavelengths at 10 Gbps of capacity each. The applicant's network deployment would be an unnecessary duplication of existing broadband infrastructure provided by a financial sound company owned by 15 rural independent telephone companies.

-----**Service Area:** Gasconade

Submitter: Fidelity Communications Co. and subsidiaries

Comment: Fidelity Telephone Co., a wholly-owned subsidiary of Fidelity Communications Co., is an ILEC providing telecommunications services in a large portion of the Applicant's proposed middle mile service area in Gasconade County, Missouri. Fidelity has provided quality service in rural exchanges since the 1940's and has built a robust broadband network, providing DSL services since 2002 at current speeds up to 5 Meg. Fidelity provides DSL services to over 45% of it's ILEC customers.

-----**Service Area:** Sullivan

Submitter: Grand River Mutual Tel.

Comment: Show Me Technologies' application covers part of Grand River Mutual Telephone Company's exchange. Grand River is capable of providing wireline broadband service to 100% of its customers throughout its territory. The majority of Grand River's customers receive service at 6.0 Mbps. Grand River's territory is neither unserved nor underserved.

Submitter: Northeast Missouri Rural Telephone Company

Comment: Northeast Missouri Rural Telephone Company (NEMR) offers middle mile services to connect the communities of Unionville, Livonia, Worthington, Martinstown, Lemons, Pollock, Green City, Green Castle, Winigan, Milan, Novinger, Kirksville, Queen City, Memphis, Arbela, Rutledge and Luray, in the counties of Adair, Putnam, Sullivan, Schuyler, Scotland and Clark all in the State of Missouri. NEMR has a state-of-art SONET OC 192 transport network that connects all these communities and offers a capacity of 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. Further, NEMR is a member owner of the 14 ILEC member Missouri Network Alliance (MNA) network. This network covers much of Missouri and connects NEMR by this state-of-art fiber network and the other owners into the Kansas City Metro area where it connects with major Internet providers. NEMR has a 90 Mb data connection on MNA to redundant Internet POPs in Kansas City.

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Submitter: Missouri Network Alliance, L.L.C.

Comment: Missouri Network Alliance, L.L.C. (MNA) is a "middle-mile" broadband services provider and an existing RUS borrower. As one of the early RUS Broadband Pilot Program loan fund recipients, MNA has deployed a "state-of-the-art" high capacity broadband network within the service area defined by the Applicant. The MNA network is a DWDM/SONET based network capable of supporting 40 wavelengths at 10 Gbps of capacity each. The applicant's network deployment would be an unnecessary duplication of existing broadband infrastructure provided by a financial sound company owned by 15 rural independent telephone companies.

-----**Service Area:** Schuyler

Submitter: Mark Twain Rural Telephone Company

Comment: The application submitted by Sho-Me Technologies, L.L.C. contains inaccurate and incomplete information and should be rejected, or in the alternative, amended appropriately. Sho-Me Technologies incorrectly classifies a significant portion of the proposed service area that is currently being served by Mark Twain as unserved and / or underserved as defined by the NOFA. Mark Twain responds by providing evidence and supporting documentation to prove that these areas served by Mark Twain are in fact adequately served with copper, wireless and / or fiber optic facilities. All communities and all subscribers in the designated areas served by Mark Twain have access to adequate and affordable middle mile transport facilities as well as last mile broadband service that exceeds 3 Mbps. As such, the proposed service area contained in the application that is currently served by Mark Twain should not be eligible for funding according to the rules and regulations posted by NTIA and RUS.

Submitter: Northeast Missouri Rural Telephone Company

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Missouri and connects NEMR by this state-of-art fiber network and the other owners into the Kansas City Metro area where it connects with major Internet providers. NEMR has a 90 Mb data connection on MNA to redundant Internet POPs in Kansas City.

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-----**Service Area:** Worth

Submitter: Grand River Mutual Tel.

Comment: Show Me Technologies’ application covers part of Grand River Mutual Telephone Company’s exchange. Grand River is capable of providing wireline broadband service to 100% of its customers throughout its territory. The majority of Grand River’s customers receive service at 6.0 Mbps. Grand River’s territory is neither unserved nor underserved.

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.

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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.”