

Broadband USA Applications Database

Applicant Name: Long Lines Siouxland, LLC

Public Notice Submissions

-----**Service Area:** Northeast Nebraska Broadband Project

Submitter: American Broadband Wireless

Comment: HunTel CableVision is an incumbent cable television provider with municipal franchise authority to offer cable television service in 20 communities in northeast Nebraska. HunTel Cablevision offers broadband internet and data services utilizing high speed wireless technologies in rural areas that extend beyond the municipal boundaries of its franchised cable television serving areas. HunTel Cablevision is also classified as a competitive local exchange carrier (CLEC), and is designated by the Nebraska Public Service Commission (PSC) as an eligible telecommunications carrier (ETC) for purposes of receiving Federal Universal Service Support (FUSF). HunTel CableVision offers rural wireless broadband services at speeds that meet and exceed the minimum download (768 Kbps) and upload (200 Kbps) speeds defined in the NOFA. HunTel CableVision does business as (dba) American Broadband in Nebraska. This specific response is from the perspective of the wireless broadband service that is offered in the rural areas that extend beyond our municipal franchise serving areas that overlap with the Long Lines Siouxland, LLC Last Mile Stimulus Application. We have also filed a separate response from the perspective of our cable modem broadband service.

HunTel CableVision (dba American Broadband) advertises broadband service alternatives using wireless technologies that meet and exceed minimum download and upload speeds defined in the NOFA.

HunTel CableVision subscriber numbers provided in this response do not include the cable modem subscribers included in our companion cable modem response to the Long Lines application and do not count/include the penetration of Qwest, which is the ILEC in communities where HunTel CableVision operates as a CLEC, or other broadband competitors that operate in the service area that Long Lines has applied for.

Long Lines, LLC has submitted a last mile broadband stimulus application that overlaps HunTel CableVision wireless serving areas. The Long Lines application overlaps with 3,768 census blocks in which HunTel CableVision offers wireless broadband services. In these census blocks, HunTel CableVision provides wireless broadband service to 488 residential customers and 31 business customers. This does not include the number of residences served by Qwest and other broadband competitors, and our own cable modem broadband services offered within our cable television municipal franchise areas. Thus, the overlap area in the Long Lines application is not unserved and it is not underserved. Furthermore, HunTel CableVision offers its wireless broadband service at speeds that

exceed the NOFA minimums, and HunTel CableVision (doing business as American Broadband) advertises speeds that exceed NOFA minimums.

The Long Lines, LLC stimulus application should be rejected for several reasons, which include but are not limited to:

1. Long Lines, LLC applied for Stimulus dollars in areas (Census Blocks) that are not unserved or underserved.
2. The Long Lines, LLC application is overly broad because it did not seek to perform validations of broadband penetration rates at the Census Block level, whereas HunTel CableVision 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. Long Lines, LLC proposes a 4G wireless technology solution. 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. Long Lines, LLC is only one of several wireless providers within the geography applied for that have 4G network deployment plans (Verizon, AllTel, United States Ceullular, etc.)
5. Long Lines, LLC's application overlaps with the designated service areas of HunTel CableVision. It is not apparent that Long Lines has addressed the challenge of its application's ability to be economically sustainable in areas that lack population density since Long Lines is not designated by the Nebraska (PSC) as an eligible telecommunications carrier (ETC) for purposes of receiving Federal Universal Service Fund (FUSF) support.
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 HunTel CableVision has a resident work force, located within its designated serving areas in Eastern Nebraska, and it has a history of sustained employment.

Submitter: Pierce Telephone Company, Inc.

Comment: For the portion of this application that overlaps the Pierce Telephone Company, Inc. serving area, broadband of at least 768kbps downstream and 200kbps upstream is accessible to 100% of

households and 100% of businesses. Additionally, Pierce Telephone Company, Inc. offers 3Mbps, 8Mbps, 10Mbps, and 12Mbps service in this area. Lastly, Pierce Telephone Company, Inc. combined with its primary competitor, Cable One, supplies broadband service to over 40% of the households in this area. Per the criteria defined for the stimulus program, this area is classified as served.

Submitter: Plainview Telephone Company

Comment: Plainview Telephone Company (PTC) offers FTTP broadband internet service with up to 6 Mbps download speed and up to 2 Mbps upload speed. PTC is capable of delivering FTTP broadband service to all households in its service territory.

Submitter: Amercian Broadband Cable modem

Comment: HunTel CableVision is an incumbent cable television provider with municipal franchise authority to offer cable television service in 20 communities in northeast Nebraska. HunTel Cablevision offers broadband internet and data services utilizing cable modem (within municipal franchise boundaries) and high speed wireless technologies in rural areas that extend beyond the municipal boundaries of its franchised cable television serving areas. HunTel Cablevision is also classified as a competitive local exchange carrier (CLEC), and is designated by the Nebraska Public Service Commission (PSC) as an eligible telecommunications carrier (ETC) for purposes of receiving Federal Universal Service Support (FUSF). HunTel CableVision offers broadband services at speeds that meet and exceed the minimum download (768 Kbps) and upload (200 Kbps) speeds defined in the NOFA. HunTel CableVision does business as (dba) American Broadband in Nebraska. 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 Long Lines Siouxland, LLC Last Mile Stimulus Application. We have also filed a separate response from the perspective of our wireless broadband service that is offered in rural areas that extend beyond our municipal cable television service areas.

HunTel CableVision (dba American Broadband) advertises broadband service alternatives that meet and exceed minimum download and upload speeds defined in the NOFA.

HunTel CableVision 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 Qwest, which is the ILEC in communities where HunTel CableVision operates as a CLEC, or other broadband competitors that operate in the service area that Long Lines has applied for.

Long Lines, LLC has submitted a last mile broadband stimulus application that overlaps HunTel CableVision serving areas. The Lone Lines application overlaps with 815 census blocks in which HunTel CableVision offers cable modem broadband speeds. In these 815 census blocks, HunTel CableVision provides broadband service to 2,343 residential customers and 208 business customers. HunTel CableVision approaches 40% penetration amongst residences all by itself and this does not include the

number of residences served by Qwest and other broadband competitors. Thus, the overlap area in the Long Lines application is not unserved and it is not underserved. Furthermore, HunTel CableVision offers its cable modem broadband service at speeds that exceed the NOFA minimums and exceed 3 Mbps, and HunTel CableVision (doing business as American Broadband) advertises speeds that exceed 3 Mbps.

The Long Lines, LLC stimulus application should be rejected for several reasons, which include but are not limited to:

1. Long Lines, LLC applied for Stimulus dollars in areas (Census Blocks) that are not unserved or underserved.
2. The Long Lines, LLC application is overly broad because it did not seek to perform validations of broadband penetration rates at the Census Block level, whereas HunTel CableVision 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. Long Lines, LLC proposes a 4G wireless technology solution. 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. Long Lines, LLC is only one of several wireless providers within the geography applied for that have 4G network deployment plans (Verizon, AllTel, United States Cellular, etc.)
5. Long Lines, LLC's application overlaps with the designated service areas of HunTel CableVision. It is not apparent that Long Lines has addressed the challenge of its application's ability to be economically sustainable in areas that lack population density since Long Lines is not designated by the Nebraska (PSC) as an eligible telecommunications carrier (ETC) for purposes of receiving Federal Universal Service Fund (FUSF) support.
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 HunTel CableVision has a resident work force, located within its designated serving areas in Eastern Nebraska, and it has a history of sustained employment.

Submitter: Great Plains Communications, Inc.

Comment: Long Lines Siouxland, LLC (Long Lines) has applied for broadband funding for a proposed funded service area (PFSA) in northeast Nebraska for certain areas currently served by Great Plains

Communications, Inc. (GPC). For the reasons set forth herein, the PFSA should not be considered underserved. (Long Lines has not claimed that the PFSA is unserved -- nor does it appear that it would have any basis to do so for the reasons explained in this submission.)

GPC provides facilities-based terrestrial broadband service in significant portions of the Long Lines PFSA as can be seen in GPC's "overlay" map. Specifically, GPC provides broadband service availability (per the definition in the NOFA) to over 7,911 residential and business a total population of more than 17,000 people.

Of the 42,352 units that Long Lines designates as underserved, 18.7% of those housing units have broadband service available from GPC -- i.e., these units are served.

Long Lines itself indicates in its application that 14,484 housing units -- or over 25% of the total housing units in its PFSA -- are SERVED (56,836 Total – 42,352 Underserved). While some of these housing units are likely those served by GPC as discussed above, there are also many other broadband providers serving some portion of the counties contained in Long Lines' PFSA – these other broadband providers include Northeast Nebraska, Hartington, American Broadband, Connecting Point, Three River, Qwest, HunTel, CableOne, NNTC, EVERTEK, Avalon, Dynamic Broadband, PT Flashnet, KDSI, Omni-tech and Skywave Wireless. In addition, it appears that Verizon Wireless may have significant coverage in this part of Nebraska. This can be ascertained by entering a selected zip code from the Long Lines PFSA into the Verizon Wireless coverage locator at www.verizonwireless.com. Thus, once one takes into account GPC and all of the other facilities-based providers offering terrestrial broadband service within the Long Lines PFSA, it is highly likely that more than 50% of the households in that PFSA have access to facilities-based terrestrial broadband services (as such services are defined in the NOFA) -- meaning that it would not qualify as "underserved" based upon the availability criterion.

The Long Lines' application, based on its map and brief description, is an imprecise and over broad application. 4G wireless service is hardly a proven technology, particularly in rural areas, and it is unlikely that it would provide comprehensive broadband service to the more than 7,000 square miles identified in Long Lines' application. This is beyond the fact that these areas collectively are significantly served by facilities-based providers as noted above. Long Lines failed to provide a redacted executive summary so it is not possible to obtain an understanding of details regarding this Iowa-based company's plans to construct and operate a project of this magnitude in northeast Nebraska. Nevertheless, GPC wishes to call attention to the technological and financial disadvantages of 4G wireless, especially in rural areas.

4G wireless is not only an extremely expensive technology to deploy with its dependence on large numbers of tower sites, but in addition, 4G wireless suffers from the inherent technical limitations of any spectrum-based technology. At this time, only a fixed 4G platform is even available for deployment. 4G mobile equipment will not be available until at least third quarter of 2010. It is inappropriate that scarce stimulus program resources would possibly be utilized for deployment of such an expensive and undeveloped technology in rural areas where other facilities-based services are widely available. In addition, available bandwidth with 4G is significantly less than with fiber. In very rural areas, such as those comprised in much of the Long Lines application, the greater distance a customer is from a tower, the less likely that claimed speeds are attained. 4G technology is also terrain-limited, with hills greatly reducing the distances in which service is available. Also, unlike fiber, engineering experts agree that 4G wireless is not expected to be a good platform for video services due to limited bandwidth and external influences.

The National Telephone Cooperative Association (NTCA) recently filed a white paper with the FCC comparing the economic and operational characteristics of various broadband technologies including 4G. GPC has posted this white paper on its website at <http://www.gpcom.com/NTCA/>. The conclusions set forth in the white paper confirm the limitations of 4G wireless technologies in an application such as are proposed by Long Lines.

In short, Long Lines Siouxland, LLC is applying for \$25.2M in grant funding to deploy broadband in portions of Northeast Nebraska that already have considerable broadband availability. Moreover, as discussed elsewhere herein, the Long Lines application likely fails to satisfy any other criteria that would qualify its PFSA as underserved (assuming it even asserted any other basis than availability as the justification for its underserved claim). Specifically, as described further herein, a substantial amount of the GPC customers in the PFSA subscribe to the broadband services offered by GPC, and GPC advertises a broadband service with transmission speeds of at least 3 Mbps downstream within the PFSA.

Granting Long Lines' application constitutes an inefficient and redundant use of funds. Therefore, its application should be rejected.

Submitter: Three River Telco

Comment: Three River Telco currently provides service in its certificated exchange areas that meets or exceeds all ARRA NOFA requirements to be classified as a "Served" area. 100% of the households have access to Broadband service at a rate of 768/200 Kbps or higher. The current residential take rate of

Broadband services in the application area at a speed of 768/200 Kbps or higher is 40% of households. Three River Telco offers an 8 Mbps service.

Submitter: Stanton Telecom, Inc.

Comment: For the portion of this application that overlaps the Stanton Telecom, Inc. serving area, broadband of at least 768kbps downstream and 200kbps upstream is accessible to 100% of households and 100% of businesses. Additionally, Stanton Telecom, Inc. offers a 3Mbps downstream and 6Mbps downstream service in this area. Lastly, Stanton Telecom, Inc. supplies broadband service to over 40% of the households in this area. Per the criteria defined for the stimulus program, this area is classified as served.

Submitter: Hartington Telecommunications Co., Inc.

Comment: Hartington Telecommunications Co., Inc. is providing information regarding the number of residential households and business establishments capable of receiving broadband in the area that the applicant's PFSA overlaps the respondent's service area. Hartington Telecommunications Co., Inc. is also providing information regarding the number of existing customers purchasing broadband service in the area of overlap. Hartington Telecommunications Co., Inc. overlapping broadband service area, at a minimum defined as 768k downstream and 200k upstream are displayed on the associated mapping tool. In the area of overlap, 100% of households have access to facilities-based broadband service and the rate of broadband subscribership for residential households and business establishments exceeds 40%. Hartington Telecommunications Co., Inc. also advertises broadband transmission speeds of at least 3 Mbps downstream within the area of overlap. Accordingly, such area is not underserved.

Submitter: Cable Nebraska, LLC

Comment: Cable Nebraska provides high speed data service with more than 3 Meg download to Newman Grove, NE. Cable Nebraska has 23% penetration in Newman Grove. We also compete with the local telephone provider which offers DSL high speed data service. It does not seem necessary, nor a benefit, to provide funding to build out a last mile project in Newman Grove, NE.

Submitter: Northeast Nebraska Telephone Company

Comment: Northeast Nebraska Telephone Company (NNTC) is filing this response to the Long Lines Siouxland, LLC, (Applicant) Application because we are of the belief that this Application misrepresents the availability of Broadband service (786k downstream/200k upstream) within the area that the Applicant's proposed funded service area (PFSA) overlaps NNTC's service area.

NNTC was organized as a cooperative in 1955 and is owned by its customer/members.

NNTC is presently a borrower with the Rural Utilities Service and has been since 1955.

Within the area of overlap NNTC's buried fiber optics cable to the node (FTTN) network provides access to Broadband services to 100% of the residential households and businesses, NNTC advertises Broadband service of 3 Megabits and greater to 100% of the residential households and businesses, and NNTC has a rate of Broadband subscribership that is greater than 40%.

Applicant's request for funds to build another Broadband capable network, if granted, will be a duplication of investment, duplication of an existing FTTN Broadband capable network, and divert funding that could be available for unserved areas.

Submitter: American Broadband Exchanges (DSL)

Comment: HunTel Inc., doing business as American Broadband – Nebraska has four telephone company subsidiaries, consisting of the Arlington Telephone Company, Blair Telephone Company, Eastern Nebraska Telephone Company (ENTC), and the Rock Telephone Company. All four are classified as incumbent local exchange carriers (ILECs) and are authorized by the Nebraska Public Service Commission (PSC) and the Federal Communications Commission (FCC) to provide reliable and ubiquitous telecommunications services within their designated service areas. These ILECs offer broadband service predominantly utilizing Digital Subscriber Line (DSL) technology at speeds that meet and exceed the minimum download (768 Kbps) and upload (200 Kbps) speeds defined in the NOFA.

American Broadband - Nebraska advertises broadband service at speeds that meet and exceed minimum download and upload speeds defined in the NOFA.

American Broadband - Nebraska enjoys broadband penetration rates that exceed 40% of households in many of the census blocks contained within its exchange serving areas.

Long Lines has submitted a last mile broadband stimulus application that overlaps the American Broadband – Nebraska exchange serving areas. The Long Lines application overlaps with 933 census blocks in which American Broadband – Nebraska offers broadband services using DSL technology. In these 933 census blocks, American Broadband - Nebraska provides broadband service to 634 residential customers and 76 business customers. American Broadband - Nebraska approaches penetration of

nearly 30% 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 Long Lines application is not unserved and it is not underserved. Furthermore, American Broadband - Nebraska offers its DSL broadband service at speeds that meet and exceed the NOFA minimums.

The Long Lines stimulus application should be rejected for several reasons, which include but are not limited to:

1. Long Lines applied for Stimulus dollars in areas (Census Blocks) that are not unserved or underserved.
2. The Long Lines application did not seek to perform validations of broadband penetration rates at the Census Block level, whereas American Broadband - Nebraska 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. Long Lines proposes a wireless technology solution. Only Fiber-to-the-Premise solutions offer a future-proof solution for meeting the challenge of a rapidly increasing definition of minimum download and upload speeds. Long Lines is only one of several wireless providers within the geography applied for that offer wireless data services (Verizon, AllTel, Viaero, etc.)
5. Long Lines's application overlaps with the designated service area of American Broadband - Nebraska. It is not apparent that Long Lines has addressed the challenge of its application's ability to be economically sustainable in areas of low population density already served by 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 American Broadband - Nebraska has a resident work force, located within its designated serving areas in Nebraska, and it has a history of sustained employment.