

Broadband USA Applications Database

Applicant Name: Citizens Telecommunications Company of West Virginia

Public Notice Submissions

-----**Service Area:** WVFTS-State-Education, Health Care, Public Safety

Submitter: West Virginia PCS Alliance LC dba NTELOS

Comment: NTELOS herein provides information on its existing broadband services within Applicant's proposed service area to be funded.

Submitter: Armstrong Telephone Company

Comment: Significant portions of the proposed funded service area (PFSA) in the above Application do not satisfy the BIP or BTOP definitions of "unserved" or "underserved," and thus, should not be eligible to receive BIP or BTOP funding. Armstrong Telephone provides broadband service at speeds of 3MBPS or greater throughout the portions of Applicant's PFSA mapped in this response. (Advertisement uploaded). Armstrong's high speed broadband network passes more than 50%, and its high speed broadband exceeds 40%, of its households within the areas of Applicant's PFSA mapped herein. Given the presence of other broadband service providers in neighboring towns, it is reasonable to conclude that Applicant has failed to meet the required showings for its entire PFSA, and its application should be denied. At a minimum, Applicant has failed to meet the required showing in the portions of its PFSA served by Armstrong, and therefore, its Application should be denied with respect to the areas mapped herein.

Submitter: Armstrong Cable Services

Comment: Significant portions of the proposed funded service area (PFSA) in the above Application do not satisfy the BIP or BTOP definitions of "unserved" or "underserved," and thus, should not be eligible to receive BIP or BTOP funding. Armstrong Cable provides broadband service at speeds of 3MBPS or greater throughout the portions of Applicant's PFSA mapped in this response. (Advertisement uploaded). Armstrong's high speed broadband network passes more than 50%, and its high speed broadband exceeds 40%, of its households within the areas of Applicant's PFSA mapped herein. Given the presence of other broadband service providers in neighboring towns, it is reasonable to conclude that Applicant has failed to meet the required showings for its entire PFSA, and its application should be denied. At a minimum, Applicant has failed to meet the required showing in the portions of its PFSA

served by Armstrong, and therefore, its Application should be denied with respect to the areas mapped herein.

Submitter: JetBroadband WV, LLC.

Comment: Since 2005, Jetbroadband WV, LLC has provided full, robust broadband service in its service areas (see service area maps). JetBroadband WV, LLC advertises service of speeds above 3 Mbps throughout the identified service area[s]. JetBroadband WV, LLC passes over 50% of households within our service area and together with its existing competitors provide broadband services that combined exceed 40% subscribership penetration. Here is a recap of Jetbroadband's presence in the State:

- Jetbroadband WV, LLC has invested nearly \$25,000,000 of private capital in Wyoming County & McDowell County, WV

- Operates out of local offices

- Employs 30 local residents

- Services the local communities with its existing 637 miles of cable plant, 15 vehicles and related equipment

- Jetbroadband currently offers last-mile broadband services that includes High Speed Data, Video and Digital Phone (Triple Play offerings)

- Jetbroadband service offerings are available to over 21,000 homes/households

- Serves nearly 11,000 customers in Wyoming and McDowell Counties, WV.

Submitter: Suddenlink Communications

Comment: Citizens Telecommunications Company of West Virginia and its affiliated company, Frontier Communications, have indicated in the executive summaries of their applications that they “should be reviewed and approved together as neither is intended to be implemented on its own.” We likewise suggest that our response to this particular application filed by Citizens Telecommunications Company of West Virginia be reviewed in tandem with our response to the application filed by Frontier Communications.

In the executive summaries of both of the aforementioned applications, the applicants suggest that their respective proposals are of a finite nature. [One claims that its “proposal encompasses two (2) sets of underserved communities located in West Virginia, which have an aggregate population of 143,417 according to the U.S. Census Bureau.” The other claims that its “proposal encompasses two (2) sets of underserved communities located in West Virginia, which have an aggregate population of 27,800 according to the U.S. Census Bureau.”] However, both applicants submitted maps indicating that their proposed funded service areas encompass the entire State of West Virginia, in direct contradiction to their claims regarding the finite nature of their proposals.

For these reasons – and because only a portion (7,500) of the total census blocks were published for each of these applications – we are submitting maps and data for all of our service areas in the State of West Virginia, conclusively demonstrating that our service areas are neither unserved nor underserved.

Additional information is provided in the uploaded document, including (1) sample marketing material; (2) a guide on how to read the data we entered in the “Existing Broadband Subscribers” section of this response; (3) a summary of the vendor and methodology used for estimating competitive-service subscribers in the mapped area; (4) Suddenlink contact information, should one or more federal agencies have questions or require additional information; and (5) a summary of concerns with the response process and the limitations that process has placed on our ability to provide NTIA/RUS with relevant, timely data.