

Broadband USA Applications Database

Applicant Name: WindTalk Inc.

Public Notice Submissions

-----**Service Area:** WindTalk Midwest

Submitter: ATCJet.net LLC

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

Submitter: Granby Telephone Company

Comment:

Granby Telephone Company (GTC) has been serving this area since 1904 and Stouffer Communications, a partner company, has been providing Internet access service since 1995. Broadband services at speeds up to 1 Mbps has been available since 2005 and 3 Mbps have been available since April 2009. We were the first in the area to provide broadband service to rural Americans. We continue to be a leader in providing advanced communications to 99% of our service areas. Being a full service provider, GTC offers our customers the opportunity for consolidated packaging of communication services with competitive discounts. GTC is one of the top employers in the area. Because GTC's employees are hometown people, our community benefits from GTC's local customer service where customers always receive personal attention.

In keeping with our long tradition of providing cutting-edge technologies in communities that large providers ignore, GTC has begun a Fiber To The Home (FTTH) project. The first section of our FTTH project will be completed by the first quarter 2010. Additionally, the entire project is estimated to be completed in 2014, and every customer in GTC's service areas, even in the most remote rural areas, will have a direct fiber feed from their home and business to the world.

Submitter: Wamego Telecommunications Co, Inc.

Comment: Wamego Telecommunications Company, Inc., provides Broadband service speeds up to 3.0Mb/s to all households and businesses within our local exchange area of service as shown on our service area map. This area is NOT an "underserved" area as defined by the federal government.

Submitter: Sunflower Broadband

Comment: Sunflower Broadband is commenting to the stimulus application of WindTalk Inc. for the proposed funded service area identified in the application as "WindTalk Midwest". Within the proposed service area, Sunflower Broadband provides broadband services that meet and exceed the speeds defined in the NOFA. Sunflower Broadband's full facilities-based broadband service is provided through an HFC network. The current functionality and future capability exceeds the technology proposed by WindTalk Inc. Sunflower Broadband is also providing wireless service in portions of the proposed service area of "WindTalk Midwest". Because the wireless product has been available for 4 years, Sunflower Broadband has experience with the topographic challenges as there are areas where terrain is not conducive to a wireless option and in our experience at least 50% of homes in the area cannot be reached with a wireless option. In addition to Sunflower Broadband, there are at least two other existing wireless Internet options in the proposed service area.

Submitter: Hill Country Telephone Cooperative

Comment: On behalf of Hill Country Telephone Cooperative, Inc. (HCTC), I am writing to object to WindTalk, Inc.'s BIP/BTOP "Last Mile Remote Area" loan request pertaining to HCTC's service area located in the Texas Hill Country in the State of Texas. WindTalk's application claims under this project to build out and provide needed data services to underserved areas throughout the Texas Hill Country.

As General Manager of Hill Country Telephone Cooperative, Inc., I would like to bring to your attention that the Cooperative already provides broadband service with speeds up to 17-20Mbps to its service area. Our cooperative, in collaboration with the Texas Lone Star Network (TLSN), a statewide fiber middle mile network composed of independent telcos, has invested heavily in building a future proof fiber optic network. Our cooperative is in year two of a four-year construction program for continual upgrade and enhancement of bandwidth availability. We advertise 3 Mbit/second cooperative-wide, but in actuality have much greater bandwidth available to meet our members' requirement. Our service area has been included in WindTalk's application which invalidates their claim to provide service to an area where there is no broadband service.

WindTalk claims in their application lack of access to broadband services in the Texas Hill Country area. Growing at a rate of over 135 per month, HCTC now has approximately 5,183 DSL customers giving us a 47.2 percent penetration rate. Under this project, all local loops are shortened using fiber to the node architecture to allow bandwidth capabilities of 17-20Mbps. All green field projects are fiber-to-the-home.

HCTC's being a member-owned non-profit Cooperative has worked diligently to provide broadband service to its membership. Understanding the ever-growing importance of broadband, HCTC has been sensitive to its members' needs and the rural economic development that comes from broadband infrastructure investment. Through this broadband investment, we contend untold opportunities will prevail for enhanced education application for our children, jobs, medical applications, and access to information necessary to function in today's world.

Therefore, Hill Country Telephone Cooperative, Inc. respectfully request that WindTalk, Inc.'s BIP/BTOP loan request to provide data services to the Texas Hill Country be denied.

Delbert Wilson, General Manager

Submitter: Cox Communications Inc

Comment: Cox Communications, Inc.(Cox) is a broadband communications and entertainment company, providing advanced digital video, Internet, telephone and wireless services over its nationwide IP network. The third-largest U.S. cable TV company, Cox serves over 6.2 million residences and businesses.

Cox operates in hundreds of communities in 18 states and has invested over \$16 billion in private capital in its network over the last ten years. Cox provides its customers in Oklahoma with 21st century infrastructure that provides advanced broadband, video and telephone services. More than 99.5 percent of the households in our service areas have access to Cox high-speed Internet, at some of the fastest broadband speeds available in the nation.

Cox supports the goals of the American Recovery and Reinvestment Act to extend broadband to parts of the country that are unserved or underserved. We appreciate the efforts of the Rural Utilities Service and the National Telecommunications and Information Administration in making sure that the limited amount of broadband stimulus funding available under the ARRA is targeted toward those consumers in greatest need, rather than to areas that already have access to broadband service.

To assist your agencies in ensuring that ARRA funds are directed to truly unserved and underserved areas, Cox is providing supplemental information that demonstrates, for the above-referenced application, the following: the location of Cox's broadband infrastructure; broadband service levels provided; number of customers served; pricing for each service tier; and marketing materials which demonstrate service availability. Consistent with the statutory requirement to expend funds only for projects in eligible areas, we trust that your agencies will use this information -- along with information from other broadband providers -- to obtain a clear picture of service availability in the area covered by the application. We encourage the use of independent due diligence to determine the extent of other broadband service offerings in the proposed funded service area covered by this submission, if other providers fail to submit information prior to the submission deadline.

We request that this data be treated as confidential and proprietary. Much of the information provided with this letter constitutes trade secrets or commercial information that is privileged and confidential and therefore exempt from public disclosure under 5 U.S.C. § 552(b)(4). Cox does not disclose this information to the public, and release of this information could cause competitive harm, by enabling other broadband providers to tailor their business strategies to unfairly compete with Cox.

Thank you for the opportunity to submit this information. We trust that it will be helpful in your analysis, and will inform your final decision concerning the application.

Submitter: Applied Communications Technology Inc

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

Submitter: Prairie Grove Telephone Company

Comment: In the Farmington, Lincoln, Morrow, Prairie Grove, and Strickler exchanges - Prairie Grove Telephone Company objects to the classification of the proposed area being designated as underserved. Prairie Grove provides access to consumers of facilities-based broadband transmission speeds of at least 768 kilobits to 100% of the Proposed Funded Service Area. Not only does Prairie Grove provide services to this area, but two wireless broadband service providers and a competitive Local Exchange Carrier (CLEC) also compete and advertise broadband services of speeds up to and over 3 megabits in the proposed funded service area. Prairie Grove also advertises services of over 3 Mbps. Prairie Grove believes that, when coupled with the two broadband wireless providers and the CLEC, the penetration rate of broadband access is over 40% in the proposed service area. Prairie Grove has invested extensively in the proposed funded service area to bring consumers the latest broadband technologies. Therefore this application should be rejected based on the above statements.

Submitter: James Cable LLC

Comment: James Cable provides 8Mg Broadband service to the community of Jacksboro, Decatur, and Bowie, Texas, Armstrong, Caddo, Calera, Colbert, and Durant, Oklahoma, and Westlake, Moss Bluff, Vinton, and DeQuincy, Louisiana. We provide 3Mg service to the communities of Bryson, Alvord, Runaway Bay, Chico, PK Lake and Graford, Texas, Achille and Bokchito, Oklahoma, and Kinder, Oberlin, Lake Arthur, Elton and Welsh, Louisiana.

Submitter: Allegiance Communications, LLC

Comment: Allegiance Communications (Allegiance) currently provides a wide array of broadband offerings within the proposed funded service area. Allegiance has offered broadband services in excess of the 3 MB bandwidth requirement as set forth in the ARRA, NOFA and BIP/BTOP guidelines, all prior to the ARRA approval. Allegiance's service area already provides for "sufficient access to broadband service to facilitate rural economic development", as well as allows for choice of service providers through competing with Local Exchange Carriers, and allows for leasing of services through our own facilities. Allegiance's opinion of the proposed funded service area is that of excess spending where funds could be better used in other portions of the country to deploy broadband service in accordance with the ARRA, NOFA and BIP/BTOP programs. Through funding the proposed service area, excessive competition will be created for all, which may create a short term economic boost, but have severe long term ramifications which may force service providers out of business.

Submitter: Northeast Missouri Rural Telephone Company

Comment: The application submitted by WindTalk Inc 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, which is 46.8% of households and 71.0% of businesses; 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: McDonal County Telephone

Comment: McDonald County Telephone Company is capable of providing broadband at speeds of at 3.0 Mbps downstream and 1.5 Mbps upstream to 100% of its customers in all of its exchanges where WindTalk’s application overlaps McDonald County’s service territory. McDonald County’s territory is neither unserved nor underserved.

Submitter: Geneseo Telephone Company

Comment: Geneseo Telephone Company, Cambridge Telephone Company and Henry County Telephone Company (collectively “Incumbent Telephone Companies”) are located within the Applicant’s Proposed Service Area. The Incumbent Telephone Companies can demonstrate undisputable, documented proof that the Proposed Service Area which overlaps the Incumbent Telephone Companies territory does not meet the statutory definition of either unserved or underserved. Therefore, the Incumbent Telephone Companies respectively request that the application be denied for failure to meet that specific requirement.

Submitter: Broken Bow TV Cable

Comment: Broken Bow TV cable has provided cable modem service to the Idabel area since 2003

Submitter: Glenwood Telephone Membership Corporation

Comment: Glenwood Telephone has been providing state-of-the-art telecommunication services to this area since 1957 and High Speed Internet for over 8 years.

Submitter: Rock Port Telephone Company and Affiliates

Comment: Executive Summary: Rock Port Telephone Company and its affiliates advertize and are capable of providing broadband service at download rates of 1, 3 and 5 mbps to 99% of the households in their exchange territory. Within that ILEC service area 46% of households have subscribed to the broadband product. Countywide, we provide broadband service with speeds greater than 3mbps to 32% of the households. In that area, two other companies also offer broadband. The three companies' combined customer count is greater than 40%. Atchison County does not qualify as an unserved or underserved area.

Submitter: WesTel Systems

Comment: WesTel Systems demonstrates that it provides broadband service throughout the Hooper and Uehling areas which are encompassed in the proposed funded Service Area in the WindTalk Inc. application and that the proposed funded Service Area is not unserved or underserved.

As demonstrated, 100% of households in WesTel's service territory within the proposed funded Service Area are able to readily subscribe upon request to facilities-based, terrestrial broadband services with an advertised speed of greater than 768 kbps downstream and 200 kbps upstream from WesTel; 100% of the households in WesTel's service territory within the proposed funded Service Area have access to facilities-based, terrestrial broadband service at greater than the minimum broadband transmission speed as set forth in the definition of broadband; WesTel advertises broadband service at broadband transmission speeds of at least 3 megabits per second downstream throughout the proposed funded Service Area; and the rate of broadband subscribership for the proposed funded Service Area is greater than 40 percent of households.

Submitter: Pottawatomie Telephone Company

Comment: Pottawatomie Telephone Company through its subsidiary, Cim-Tel Cable, LLC, has been offering broadband speed data service to subscribers for over 5 years. The area applied for by the ARRA applicant, which falls within the telephone exchange boundary is served with high speed internet

broadband service. Cim-Tel Cable, LLC also offers IPTV service to its subscribers within the communities Pottawatomie serves.

Submitter: National Telephone of Alabama, Inc.

Comment: National Telephone of Alabama, Inc. (NTA) is an existing RUS Traditional Telephone Borrower and since the early 1920's has served as the existing Incumbent Local Exchange Company (ILEC) for 3 exchange areas within the rural county of Colbert in the State of Alabama, portions of which are proposed to be served by WindTalk Inc. in their ARRA Broadband Stimulus application.

NTA currently advertises and provides broadband services, at speeds up to 3 Mbps to residential and up to 10 Gbps to business subscribers within the area proposed by this applicant. In addition, broadband service, at speeds greatly in excess of the minimum broadband speed defined by the ARRA NOFA is currently available through the NTA broadband network to approximately 86% of homes and businesses within the NTA service territory. This has been confirmed by Governor Riley's "ConnectingALABAMA" Broadband Availability mapping project. The area proposed to be served by the applicant contains 16,210,791 households according to the 2000 U.S. Census, of which 452 residential and business subscribers are already served by NTA. For these reasons the applicant's request for funding to overbuild areas already served by NTA should be denied.

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: Cable America Missouri LLC

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

Submitter: Grand River Mutual Tel. / Lathrop Tel.

Comment: Wind Talk'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.

Submitter: Craw-Kan Telephone Cooperative, Inc.

Comment: Craw-Kan Telephone Cooperative, Inc. (CKT) is a telecommunications company serving rural areas of Southeast Kansas, Southwest Missouri and Northeast Oklahoma with high quality communication services for more than 55 years. As a full service provider, CKT was among the first in the area to provide broadband service to rural customers. CKT has diligently worked to extend broadband services to over 97% of our customer base. CKT counts among its broadband service customers community anchor institutions including public safety agencies, schools, libraries and healthcare providers. CKT is in the midst of a Fiber to the Home project to provide additional broadband capability in an ever evolving industry.

Submitter: Wichita Online Inc.

Comment: Wichita Online (WOI) currently provides a wide array of broadband offerings within the proposed funded service area. WOI has offered broadband services in excess of the 3 MB bandwidth requirement as set forth in the ARRA, NOFA and BIP/BTOP guidelines, all prior to the ARRA approval. WOI's service area already provides for "sufficient access to broadband service to facilitate rural economic development", as well as allows for choice of service providers through competing with Local Exchange Carriers, and allows for leasing of services through our own facilities. The proposed funded service area already provides for not only broadband service through WOI, but several ILEC's, Cable companies, and numerous mobile broadband service providers offer several choice to the subscriber. WOI's opinion of the proposed funded service area is that of excess spending where funds could be better used in other portions of the country to deploy broadband service in accordance with the ARRA, NOFA and BIP/BTOP programs. Through funding the proposed service area, excessive competition will be created for all, which may create a short term economic boost, but have severe long term ramifications which may force service providers out of business.

Submitter: Trust Cable of MS, Inc.

Comment: Trust Cable of MS, Inc. advertises and provides 3 mbps high speed cable modem broadband service in the funded service area. Trust Cable serves the towns of Gloster, Woodville, Centreville, and Liberty.

Submitter: Cross Cable Television, Inc.

Comment: Cross Cable Television, Inc., has been offering broadband speed data service to its subscribers in Whitefield for over 3 years. It currently is constructing Stigler and Chocotah using RUS Broadband Loan funds. The area applied for by the ARRA applicant, which falls within Cross's franchise boundaries, is served with high speed internet broadband service.

Submitter: Columbus Telephone Co.

Comment: Columbus Telephone Co. is a 100% fiber optic company, serving its certified area with fiber to the premise at synchronous speeds up to 16 megabits per second. Columbus has the installed capacity, at the premise, to deliver 100 megabits per second to the premise.

Submitter: American Broadband Cable TV (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 U.S. Cellular 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 WindTalk has applied for.

WindTalk has submitted a last mile broadband stimulus application that overlaps HunTel CableVision serving areas. The Lone Lines application overlaps with 812 census blocks in which HunTel CableVision offers cable modem broadband speeds. In these 812 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 WindTalk 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 WindTalk stimulus application should be rejected for several reasons, which include but are not limited to:

1. WindTalk applied for Stimulus dollars in areas (Census Blocks) that are not unserved or underserved.
2. The WindTalk 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. WindTalk proposes a 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. WindTalk is only one of several wireless providers within the geography applied for that already offer data services over their wireless networks (Verizon, AllTel, Viaero, etc.)
5. WindTalk's application overlaps with the designated service areas of HunTel CableVision. It is not apparent that WindTalk has addressed the challenge of its application's ability to be economically sustainable in areas that lack population density, and are already served by multiple broadband 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 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: S&A Telephone Company

Comment: It is impossible to understand fully what WindTalk proposes to do. They have redacted so much of their executive summary that it is impossible to understand their technology or their plans. WindTalk should be required to produce a non-redacted version of the executive summary so that parties have a legitimate chance to understand what they are proposing. If they are required to do so, we should get another chance to respond. WindTalk should not be eligible for a grant as a result of withholding information and this grant request probably should be rejected simply for obscuring the facts. There is no way to understand the technology they propose and other key information we need to analyze their proposal.

With that said, it appears that they are asking to deploy some sort of wireless technology. The maps they have provided show that they plan to serve the whole region including the entire service territory of S&A Telephone Company. S&A is an incumbent rural telephone company that has been serving this area for over 80 years. S&A 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 S&A need a barrier against competition to ensure that people in the area can get service for the next century. S&A 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 S&A service territory is 'served' 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.

Our local knowledge of this region tells us that this grant also proposes to bring broadband to many areas where AT&T and other small telephone companies already provide broadband today.

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 the vast majority of residences and businesses covered by this proposed grant are already 'served' today with broadband using the definitions defined in the NOFA. WindTalk seems to think 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 and are not eligible for grant funding. The NOFA allows for a small portion of any grant to cover served areas, but this grant is mostly covering served areas that already have broadband and should be rejected. WindTalk seems to have done zero homework about the local availability of broadband and simply has proposed to get federal money to serve large areas regardless of what is there today. We notice that they have filed similar grant requests all around the country and perhaps they are hoping one of these flawed applications will sneak through. Again, this grant needs to be rejected for a host of reasons, primarily for ignoring the grant rules for

eligibility, but also for redacting all of the relevant information needed to properly understand their proposal.

Submitter: Ritter Communications

Comment: Ritter Communications responds to the filed application of WindTalk Midwest. Ritter provides access to broadband service in 100% of its service area which overlaps portions of the WindTalk Midwest PFSA in Arkansas, through E. Ritter Telephone and affiliates Ritter Cable, E. Ritter Communications, and Tri-County Telephone. Because of Ritter Communications' broadband service availability overlaps portions of the proposed funded services area, portions of the PFSA do not meet the underserved designation indicated by WindTalk.

Submitter: Oregon Farmers Mutual Telephone Company

Comment: It is impossible to understand fully what WindTalk proposes to do. They have redacted so much of their executive summary that it is impossible to understand their technology or their plans. WindTalk should be required to produce a non-redacted version of the executive summary so that parties have a legitimate chance to understand what they are proposing. If they are required to do so, we should get another chance to respond. WindTalk should not be eligible for a grant as a result of withholding information and this grant request probably should be rejected simply for obscuring the facts. There is no way to understand the technology they propose and other key information we need to analyze their proposal.

With that said, it appears that they are asking to deploy some sort of wireless technology. The maps they have provided show that they plan to serve the whole region including the entire 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 get service 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' 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.

Our local knowledge of this region tells us that this grant also proposes to bring broadband to many areas where AT&T and other small telephone companies already provide broadband today.

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 the vast majority of residences and businesses covered by this proposed grant are already 'served' today with broadband using the definitions defined in the NOFA. WindTalk seems to think 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 and are not eligible for grant funding. The NOFA allows for a small portion of any grant to cover served areas, but this grant is mostly covering served areas that already have broadband and should be rejected. WindTalk seems to have done zero homework about the local availability of broadband and simply has proposed to get federal money to serve large areas regardless of what is there today. We notice that they have filed similar grant requests all around the country and perhaps they are hoping one of these flawed applications will sneak through. Again, this grant needs to be rejected for a host of reasons, primarily for ignoring the grant rules for eligibility, but also for redacting all of the relevant information needed to properly understand their proposal.

Submitter: The Southern Kansas Telephone Co., Inc.

Comment: The Southern Kansas Telephone Co., Inc. (SKT) has been providing service to rural Kansas communities for 70 years. SKT is committed to providing rural Kansans broadband service that helps both increase the quality of life and allows them to conduct business in a much more productive manner. As an example of this commitment, SKT began offering broadband service in 2001. SKT has continuously upgraded its fiber network over the years to meet the service needs of its customers. SKT currently offers broadband service up to and exceeding 12.0 M downloads and 1.0 M uploads. SKT customers benefit from local customer care, 24/7 support, multiple service discounts, free hardware and installation options that make broadband service more affordable and easier to get connected. SKT's owners and 54 employees are local Kansans who understand the needs of their customers and the importance of supporting the rural communities they serve. To help these communities flourish in the future, SKT provides complimentary broadband service to all local municipalities, including city, police, fire, and EMS locations, as well as libraries and senior centers. SKT will continue to focus on providing vital broadband services for rural Kansans.

Submitter: NELA Telephone

Comment: North East Louisiana Telephone Company provides broadband access capability to 100% of the households within the area of the proposed funded serving area indicated "PFSA" challenged area. North East Louisiana Telephone is a rural ILEC that has been serving the area for some time. In the challenged PFSA they currently offer ADSL broadband services. As of June 2009 they are serving 17% of the households within this area with Broadband services, although some of the access speeds are below

768Kbps. “Note we have used the Household numbers from the tool as homes passed but feel this number is too large for this service area”. North East Louisiana offers speeds of 3Mbps throughout this area. Due to customer choice within this area only 72% of the total households currently served have opted for access speed in excess of 768Kbps. Therefore by any of the definitions of the ARRA broadband program this area does not qualify as un-served and 3Mbps speeds are available throughout the challenge area.

Submitter: Stouffer Communications

Comment: Stouffer Communications currently serves this area with internet access and Broadband services. Speeds up to 1Mbps have been available since 2003 and speeds of 3Mbps are currently available. We were the first in our area to provide advanced broadband services to rural residents. We are a full service provider offering computer repair and local technical support for our customers.

We continue to expand our coverage areas to include as close to 100% of the customers within our service areas as possible. We have upgraded the majority of our service access points in an effort to provide even the most rural customers with advanced Broadband internet. Our backbone is fiber-based and we are able to offer a very reliable connection at an affordable price to customers in our area.

Submitter: Northeast Nebraska Telephone Company

Comment: Northeast Nebraska Telephone Company (NNTC) is filing this response to the WindTalk, Inc., (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: International Broadband Electric Communications

Comment: IBEC is providing High Speed Internet services in this area under an existing RUS Rural Broadband Loan.

Submitter: Wheat State Telephone, Inc

Comment: Wheat State Telephone has been serving 6 rural communities in south central Kansas for almost 60 years. Some of our service areas are in the heart of sparsely populated cattle country, yet we are committed to delivering high speed broadband service to all of our customers. Wheat State Telephone was the first provider of broadband service in the area as early as July, 2000. Since then we have continually upgraded our network to bring higher speeds to more and more of our subscribers. Wheat State Telephone continues to be a leader in broadband services. Based on the NOFA definition of broadband these communities are neither unserved nor underserved.

Wheat State Telephone is a community based company, with just under 50% of its staff being residents of the communities we serve. Our employees are active in the communities, volunteering with numerous events and serving on various local boards or committees.

Submitter: KeyOn Communications

Comment: KeyOn Communications currently provides access at speeds of at least 768kbps downstream and at least 200kbps upstream to more than 50% of the homes in the designated area.

Submitter: Mercury Wireless, LLC

Comment: Mercury Wireless currently provides up to 3 mbps wireless Internet access to sections of the applicant's proposed service area.

Submitter: Allegiance Communications, LLC

Comment: Allegiance Communications (Allegiance) currently provides a wide array of broadband offerings within the proposed funded service area. Allegiance has offered broadband services in excess of the 3 MB bandwidth requirement as set forth in the ARRA, NOFA and BIP/BTOP guidelines, all prior to the ARRA approval. Allegiance's service area already provides for "sufficient access to broadband service to facilitate rural economic development", as well as allows for choice of service providers through competing with Local Exchange Carriers, and allows for leasing of services through our own facilities. Allegiance's opinion of the proposed funded service area is that of excess spending where funds could be better used in other portions of the country to deploy broadband service in accordance with the ARRA, NOFA and BIP/BTOP programs. Through funding the proposed service area, excessive competition will be created for all, which may create a short term economic boost, but have severe long term ramifications which may force service providers out of business.

Submitter: Trust Cable, Inc.

Comment: Trust Cable, Inc. provides and advertises high speed cable modem broadband service with current speeds of up to 10 Mbps downstream in Jackson, Ethel, Norwood, Clinton and Wilson, Louisiana and the surrounding area.

Submitter: Farmers Telecommunications Cooperative, Inc.

Comment: The Applicant partially requests funding in an area that is served by Farmers Telecommunications Cooperative, Inc. (FTC). In such area, FTC believes it serves approximately thirty-seven percent (37%) of establishments. FTC advertizes broadband speeds of more than 3MBs. FTC provides broadband to approximately forty-six percent (46%) of establishments passed.

Submitter: Rural Telephone Service Co., Inc./Nex-Tech, Inc.

Comment: Rural Telephone Service Co., Inc., an RUS borrower since 1952, and our wholly owned subsidiary Nex-Tech, Inc., offer broadband service within the Proposed Funded Service Area as shown on the map. Portions of this area are underserved and/or served as defined in the NOFA.

Submitter: RuraliNet, LLC

Comment: RuraliNet,LLC formerly Nationsnetwork has been providing wireless service in this funding area for the past eight years. RuraliNets service area includes the city's of Welch OK, Bluejacket OK, Afton OK, Quapaw OK, Commerce OK, Miami OK and most of the surrounding areas.

Submitter: jagWIRELESS

Comment: To Whom It May Concern:

Hello, my name is Danny Olson and I am writing this on behalf of my employer, jagWIRELESS. jagWIRELESS specifically focuses on the delivery of broadband Internet services via wireless methods, using the unlicensed spectrums available from the FCC. Our organization has been in business for over 7 years and services the broadband needs of rural Southeastern Nebraska and Western Iowa. Through careful business management and investment we have built a network which now provides broadband services to nearly 1200 subscribers, in 2 states, 12 counties and from nearly 50 tower sites. In the areas we provide service we often compete with wired and other wireless service providers who may use license and license-exempt delivery methods. We differentiate our product through helpful technical support and quality customer service. We grow our business as customer demand drives our revenues and retract in areas of significant competition.

We recently discovered that WindTalk INC has requested funds to build a network in Cass County Nebraska from the Broadband stimulus package. I wish to submit a dispute regarding the "underserved" designation of this area by WindTalk INC. I will carefully detail the evidence to show that the funds request is without merit and will likely damage the ability of both or organization to provide quality services.

Submitter: Bay Springs Telephone Company, Inc.

Comment: Bay Springs Telephone Company, Inc. (BSTC) is an existing RUS Traditional Telephone Borrower and since 1923 has served as the existing Incumbent Local Exchange Company (ILEC) for 12 exchange areas within the rural counties of Jasper, Jones, Rankin Scott and Smith in the State of Mississippi, portions of which are proposed to be served by WindTalk Inc. in their ARRA Broadband Stimulus application.

BSTC currently advertises and provides broadband services, at speeds up to 3 Mbps to residential and up to 10 Gbps to business subscribers within the area proposed by this applicant. In addition, broadband service, at speeds greatly in excess of the minimum broadband speed defined by the ARRA NOFA is currently available, through the DSL and Fiber to the Home (FTTH) distribution plant of BSTC, to approximately 80% of homes and businesses within the BSTC service territory. The area proposed to be served by the applicant contains 16,210,791 households according to the 2000 U.S. Census, of which 2,438 residential and business subscribers are already served by BSTC. For these reasons the applicant's request for funding to overbuild areas already served by BSTC should be denied.

Submitter: Rainbow Communications

Comment: Rainbow Telecommunications Association, Inc. dba Rainbow Communications is a phone, Internet, and cable TV service provider in rural northeast Kansas. The telecommunications company is headquartered in Everest, Kansas, and has been in existence since 1952. While Rainbow Telecommunications has offered high speed DSL- Internet for many years, the company has since expanded its service offerings in 2006 through a CLEC operation, Carson Communications dba Rainbow Communications. Rainbow Communications is able to provide high speed DSL, cable modem, and fiber-based Internet in many northeast Kansas rural communities. It is our goal to provide communication technology which rivals or surpasses those available in metro areas.

Submitter: Community Telephone Company/ Comcell

Comment: Community Telephone Company provides this response to the WindTalk Midwest proposal in Texas. Community offers broadband service availability to 95% of its service area including the portion that overlaps the WindTalk Midwest proposed funded service area. Because it provides broadband availability, the portion of Community's service area within the PFSA is ineligible for the underserved designation.

Submitter: Georgetown Telephone Company

Comment: It is impossible to understand fully what WindTalk proposes to do. They have redacted so much of their executive summary that it is impossible to understand their technology or their plans. WindTalk should be required to produce a non-redacted version of the executive summary so that parties have a legitimate chance to understand what they are proposing. If they are required to do so, we should get another chance to respond. WindTalk should not be eligible for a grant as a result of withholding information and this grant request probably should be rejected simply for obscuring the

facts. There is no way to understand the technology they propose and other key information we need to analyze their proposal.

With that said, it appears that they are asking to deploy some sort of wireless technology. The maps they have provided show that they plan to serve the whole region including the entire service territory of Georgetown Telephone Company. Georgetown is an incumbent rural telephone company that has been serving this area for over 100 years. Georgetown 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 Georgetown need a barrier against competition to ensure that people in the area can get service for the next century. Georgetown 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 area served by Georgetown is extremely poor and very rural. The average household income for the service territory in the 2000 Census was only \$26,000 per year. Georgetown Telephone Company does not have a 40% broadband penetration rate today because of the poverty of the area. The company currently has a 34% broadband penetration and believes that almost every household with a computer has DSL service. The telephone company has made DSL available to every home and there is no part of the area where a customer cannot get broadband if they can afford it. Further, Georgetown Telephone Company has provided a free community center equipped with ten computers that is open to the public. This computer center gets tremendous use and the computers are normally all busy.

A very small and poor rural place like Georgetown Mississippi can barely sustain the one current provider, Georgetown Telephone Company. It makes no sense to use federal subsidy funding to compete against a company that has been willing to serve this rural area for 100 plus years.

Our local knowledge of this region tells us that this grant also proposes to bring broadband to many areas where AT&T and other small telephone companies already provide broadband today.

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 the vast majority of residences and businesses covered by this grant are already 'served' today with broadband using the definitions defined in the NOFA. WindTalk seems to think 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 and are not eligible for grant funding. The NOFA allows for a small portion of any grant to cover served areas, but this grant is mostly covering served areas that already have broadband and should be rejected. WindTalk seems to have done zero homework about the local availability of broadband and simply have proposed to get federal money to serve large areas regardless of what is there today. We notice that they have filed similar grant requests all around the County and perhaps they are hoping one of these flawed applications will sneak through. Again, this grant needs to be rejected for a host of reasons.

Submitter: NATCO Technologies-A Subsidiary of NATCO Comm

Comment: NATCO Technologies objects to the classification of Diamond City, Lead Hill, Omaha, South Lead Hill, and Zinc as being underserved. These towns are in NATCO's service area and NATCO advertises and provides access to facilities based broadband service at speeds up to 6MB to over 90% of the proposed funded service area. Not only does NATCO provide service to this area, but Verizon Wireless, Cingular Wireless and Wilblue high speed satellite also compete and advertise broadband services of speeds up to 5 megabits in the proposed funded service area. When coupled with the two broadband wireless providers and the satellite provider, the penetration rate of broadband access would be over 40% in the proposed funding area. NATCO has invested extensively in the proposed funded service area to bring consumers the latest broadband technologies and this area is fully served. Therefore, this application should be denied for the proposed funding area that overlaps NATCO's service area.

Submitter: Glenwood Telecommunications Inc.

Comment: Glenwood Telecommunications has been providing state-of-the-art telecommunication services in this area including High Speed Internet for over 8 years.

Submitter: @Link Services LLC

Comment: @Link Services LLC is an Oklahoma LLC that has been providing broadband services in Central Oklahoma since 2005. @Link provides high speed internet service with speeds of up to 6Mbps by utilizing fixed wireless technology in both licensed and unlicensed frequencies. @Link provides service in forty four rural, Oklahoma communities and four urban areas in Central Oklahoma through a network of more than 60 tower sites.

The proposed funded service areas overlaps the @Link service area. The overlapping service area has been documented with the use of the mapping tool.

@Link has included copies of advertisements for service within the proposed funded service area.

@Link has determined, at the census block level, the number of residential households currently capable of receiving @Link service. @Link has determined the total number of business establishments

within the zip codes included in the polygon. Totals have been provided as requested and supporting documents are available if requested.

@Link has determined, at the census block level, the number of residences and businesses currently subscribing to @Link services as well as the advertised download and upload speeds. Totals have been provided as requested and supporting documentation is available as is necessary.

Submitter: Get LLC Real Cable

Comment: Funds are being provided to three other proviers in the same area. Also,this area is allready served and other providers exist. This summary responce has been provided by Get LLC Real Cable that services the community of Blackwell OK. The electric cooperative Kay electric provides service in the surrounding area of Blackwell. Four applicants are seeking money for an area allready served, this is a waate of money and is injurious to existing providers.

Submitter: Cross Wireless L.L.C.

Comment: Cross Wireless, LLC, has been offering broadband speed data service to its subscribers for over 5 years. The area applied for by the ARRA applicant, which falls within the wireless service area is served with high speed internet broadband service.

Submitter: Cherokee Telephone Company

Comment: Cherokee Telephone Company (CTC) currently provides a wide array of broadband offerings within the proposed funded service area. CTC has been offering broadband services in excess of the bandwidth requirement as set forth in the ARRA, NOFA and BIP/BTOP guidelines, all prior to the ARRA approval. CTC's service area already provides for "sufficient access to broadband service to facilitate rural economic development", as well as allows for choice of service providers through competing with

Competitive Local Exchange Carriers, and CTC's network allows for leasing of services through our own facilities. The proposed funded service area already provides for not only broadband service through CTC, but several CLEC's, Cable companies, and numerous mobile broadband service providers offer several choices to the subscriber. CTC's opinion of the proposed funded service area is that of unnecessary spending within areas where sufficient broadband offerings exist to meet current demands. Whereas the requested funding could be better utilized in other portions of the country to deploy, map, or support other broadband services in accordance with the ARRA, NOFA and BIP/BTOP programs. Through funding the proposed service area, excessive competition will be created for all, which may create a short term economic boost, but have severe long term ramifications which may force current stable and thriving service providers to close or consolidate business, leading to layoffs and resulting in another economic downturn.

Submitter: Central Texas Telephone Cooperative, Inc.

Comment: Central Texas Telephone Cooperative, Inc. (Central Texas) is an incumbent broadband provider in an area covered by Windtalk's Midwest broadband stimulus application. Central Texas provides universal broadband coverage to 100% of its potential subscribers in this area, and it provides broadband service to a significant number of those potential subscribers. Central Texas has consistently and effectively advertised the availability of broadband Internet access at speeds of 3 Mbs and higher. In addition, at least seven other broadband providers serve all or part of the Central Texas Service Territory. The combined penetration rate of Central Texas and all other incumbent broadband providers should negate a description of this portion of the applicant's Proposed Service Area as "unserved" or "underserved."

Submitter: CYTEC Software Systems, Inc.

Comment: CYTEC provide wireless broadband services to the central business district and adjacent communities of Yazoo City, MS

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: Tatum Telephone

Comment: Tatum Telephone Company demonstrates that the application filed by WindTalk, Inc. is incorrect in its claim that the area it proposes to serve which overlaps Tatum Telephone's service area is unserved. Further, Tatum Telephone demonstrates that the area WindTalk, Inc. proposes to serve which overlaps Tatum Telephone's service area does not meet all of the criteria which categorize an area as underserved.

As demonstrated, 92.2% of households in Tatum Telephone's service area, including those areas which are part of WindTalk, Inc.'s proposed funded service area, are able to readily subscribe upon request to facilities-based, terrestrial broadband services at a minimum transmission speed of greater than 768 kbps downstream and 200 kbps upstream from Tatum Telephone. Therefore, WindTalk, Inc.'s claim that this overlapping area is unserved is incorrect. Further, no part of this overlapping area is underserved on the basis of access to broadband service. In addition, Tatum Telephone demonstrates that the rate of broadband subscribership for households in Tatum, TX is significant.

Submitter: Pine Telephone company

Comment: Pine Telephone has provided high-speed digital subscriber line service since 2001

Submitter: Etex Telephone Cooperative, Inc.

Comment: Etex Telephone Cooperative, Inc. is an ILEC providing reliable terrestrial broadband data service within portions of the proposed funding area. In Etex's many years of experience within this rural service territory, including experience operating a wireless CMRS affiliate, wireless broadband services are unlikely to be able to provide reliable broadband service throughout the area due to the size and density of local forests. Etex is currently capable of delivering 4-5mbps broadband service throughout much of its service territory.

Submitter: Pine Belt Cellular Inc. dba Pine Belt Wireless

Comment: Pine Belt Cellular, Inc., dba Pine Belt Wireless, has been offering broadband data service to its subscribers for 3 years. The area applied for by the ARRA applicant falls within the franchised, FCC licensed and fixed wireless service areas of Pine Belt Cellular, and is served with high speed internet broadband service.

Submitter: Chickasaw Telephone Company

Comment: Chickasaw Telephone Company has been offering broadband speed data service to subscribers through its subsidiary Bright Net Oklahoma for 11 years. The area applied for by the ARRA applicant, which falls within the telephone exchange boundary, is served with high speed internet broadband service.

Submitter: Texas Communications

Comment: In these areas there is DSL, Cable, some FTTH, and in these and rural surrounding areas we provide high speed fixed wireless internet with speeds ranging from 1.5Mbps to 6Mbps.

Submitter: Cellular South

Comment: Respondent, Cellular South, Inc., is a privately held Mississippi corporation and commercial mobile radio service provider which provides wireless telecommunications and broadband data services to its customers throughout the State of Mississippi, in western Tennessee, in southern Alabama, and northwest Florida. Respondent operates a broadband data transmission network in the State of Mississippi which utilizes Evolution Data Optimized (“EvDO”) technology which provides data transmission speeds up to a maximum of 3.0 mbps downstream and 1.0 mbps upstream. Respondent’s EvDO network is deployed in all or part of Applicant’s proposed service area and, therefore, no portion of Applicant’s proposed service area where Respondent’s EvDO service is deployed is unserved because Respondent’s EvDO service is accessible by 100% of the households in Respondent’s service area. Respondent notes that actual wireless coverage and broadband data transmissions may vary due to atmospheric conditions, customer equipment, and/or system limitation.

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 47% of households. Three River Telco offers an 8 Mbps service.

Submitter: Spillway Communications

Comment: Spillway Communications provides high speed cable modem service with speeds of up to 6 mbps down and 3 mbps up in and around the communities of Mannagouin, Livatore, Krotz Springs and Fordoche, Louisiana.

Submitter: Clarks Telecommunications Company

Comment: Clarks Telecommunications Company (CTC) is filing this response to the WindTalk Inc., (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 CTC's service area.

CTC was organized in 1908 and in 2007 was acquired by Northeast Nebraska Telephone Company (NNTC), a customer owned cooperative.

CTC is presently a borrower with the Rural Utilities Service and has been since 1957.

Within the PFSA overlap, CTC's recently constructed buried fiber optics cable to the premise (FTTP) network provides access to Broadband services to 100% of the residential households and businesses, CTC advertises Broadband service of 3 Megabits and greater to 100% of the residential households and businesses, and with this new buried FTTP network CTC anticipates the rate of subscription to be greater than 40% in a relatively short period of time.

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

Submitter: Delta Telephone Company Inc

Comment: Delta Telephone Company, Inc. (MS531), is a privately held telecommunications, video, and broadband data services to residents in its licensed service areas. Over the years Respondent has utilized funds, including Rural Utilities Service funds, to invest in its network to deploy fiber optic and other state of the art network technologies to provide the residents of its licensed service areas with robust and technologically advanced access to broadband services. Currently, Respondent provides

access to broadband services to ninety percent (90%) of the residents in Respondent's service area. Therefore, no portion of Respondent's service area, including those which overlap with Applicant's proposed service area, are unserved.

Submitter: Rice Belt Telephone Company

Comment: In the Weiner, Waldenburg, and Fisher exchanges- Rice Belt Telephone Company objects to the classification of the proposed area being designated as underserved. Rice Belt provides access to consumers of facilities-based broadband transmission speeds of up to 1 megabit to 100% of the Proposed Funded Service Area. Not only does Rice Belt provide services to this area, but two wireless broadband service providers and one satellite broadband service provider also compete and advertise broadband services of speeds up to 5 megabits and over in the proposed funded service area. Rice Belt believes that, when coupled with the other broadband wireless providers, the penetration rate of broadband access is over 40% in the proposed service area. Rice Belt has invested extensively in the proposed funded service area to bring consumers the latest broadband technologies. Therefore this application should be rejected based on the above statements.

Submitter: Telepak Networks, Inc.

Comment: Respondent, Telepak Networks, Inc., is a privately held Mississippi corporation and competitive local exchange carrier which provides telecommunications, video and broadband data services to residents in its licensed service areas. Respondent operates a broadband transmission network which runs from Jackson, Mississippi, to Memphis, Tennessee, to New Orleans, and throughout the State of Mississippi. Respondent also operates fiber-to-the-home networks in Crystal Springs, Inverness, and Roxie Mississippi as well as certain residential developments in the State of Mississippi.

Submitter: Carnegie Telephone Company

Comment: Carnegie Telephone Company provides DSL to 100% of the Carnegie and Alfalfa exchanges at speeds of at least 3 mbps. The subscribership for the areas is over 40% of households.

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: Lafourche Telephone Company LLC

Comment: Lafourche Telephone Co. LLC (Latelco) a former RUS Traditional Telephone Borrower from February 1951 through September 2001 and since 1945 has served as the existing Incumbent Local Exchange Company (ILEC) for 5 exchange areas within the rural parishes of Lafourche and Jefferson in the State of Louisiana, portions of Lafourche and Jefferson Parishes are proposed to be served by WindTalk Inc. in their ARRA Broadband Stimulus application.

Latelco through its wholly owned subsidiary Vision Communications (Vision), a Cable TV company, currently advertises and provides broadband services, at speeds up to 10 Mbps to residential and businesses and can provide up to 100 Mbps services to business subscribers within the area proposed by this applicant. In addition, broadband service, at speeds greatly in excess of the minimum broadband speed defined by the ARRA NOFA is currently available, through the DSL and Cable Modems distribution plant of Latelco/Vision to approximately 97% of homes and businesses within the Latelco/Vision service territory. The area proposed to be served by the applicant contains 16,210,791 households according to the 2000 U.S. Census, of which 6,098 residential and business subscribers are already served by Latelco/Vision. For these reasons the applicant's request for funding to overbuild areas already served by Latelco/Vision should be denied.

Submitter: Woodhull Telephone Company

Comment: WindTalk Inc. proposed project covers a portion of the exchange served by Woodhull Telephone Company in addition to our CLEC exchange area of Alpha. We currently serve the exchanges by an existing copper twisted pairs network that extends from our corporate headquarters in Woodhull, IL. In the public notice response Woodhull is providing; 1) a map of the overlapping area Woodhull provides broadband services, 2) Woodhull's DSL high speed internet advertising 3) the number of residential households and business establishments capable of receiving broadband services, 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: East Ascension Telephone Co. LLC dba EATel

Comment: EATel currently provides access to 98.5% of the households within the area of the proposed funded serving area indicated "PFSA". EATel is a rural ILEC that has been serving the area for some time. In the challenged PFSA they offer both ADSL as well as FTTH broadband data services. As of June 2009 they are serving 18,866 broadband customers within this area or 70% of the households. EATel provides speeds of over 3Mbps throughout this area. Therefore by any of the definitions of the ARRA broadband program this area does not qualify as either Underserved or unserved.

Submitter: Brazoria Telephone Company

Comment: Brazoria Telephone and Coastal-Link provide this response to the WindTalk Midwest application in Texas. Brazoria and Coastal-Link offer broadband service to 100% of their customers in the serving area which overlaps the Midwest PFSA. Because the companies provide broadband availability to customers in the area which is a portion of the Midwest PFSA, the designation of underserved does not apply to this overlapping area.

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 WindTalk 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 WindTalk 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 WindTalk has applied for.

WindTalk has submitted a last mile broadband stimulus application that overlaps HunTel CableVision wireless serving areas. The WindTalk application overlaps with 3,342 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 WindTalk 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 WindTalk stimulus application should be rejected for several reasons, which include but are not limited to:

1. WindTalk applied for Stimulus dollars in areas (Census Blocks) that are not unserved or underserved.
2. The WindTalk 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. WindTalk proposes a 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. WindTalk is only one of several wireless providers within the geography applied for that offer wireless data services (Verizon, AllTel, Viaero, etc.)
5. WindTalk's application overlaps with the designated service areas of HunTel CableVision. It is not apparent that WindTalk has addressed the challenge of its application's ability to be economically sustainable in areas that lack population density and are 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 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: Choctaw Telephone

Comment: Choctaw Telephone Company demonstrates that the area WindTalk, Inc. proposes to serve which overlaps Choctaw Telephone's service area does not meet the criteria to categorize an area unserved and does not meet all of the criteria which categorize an area as underserved. Furthermore, WindTalk's proposed funded service area does not meet the criteria for classification as a Remote Area project.

As demonstrated, 80% of households in Choctaw Telephone's service area, including those areas which are part of Applicant's proposed funded service area, are able to readily subscribe upon request and have access to facilities-based, terrestrial broadband services at a minimum transmission speed of greater than 768 kbps downstream and 200 kbps upstream from Choctaw Telephone and, therefore, no part of this overlapping area is unserved or underserved on the basis of access to broadband service. In addition, Choctaw Telephone demonstrates that the rate of broadband subscribership for households in Choctaw Telephone's is significant. In addition, WindTalk's proposed funded service area includes non-rural areas and areas that are not at least 50 miles from the limits of non-rural areas, and does not show any part of its proposed funded service area as underserved; therefore, it is not remote.

Submitter: Colorado Valley Telephone Cooperative, Inc.

Comment: Colorado Valley Telephone Cooperative, Inc. (the Cooperative) and its subsidiary, Colorado Valley Communications (CVC) make broadband service available in the area indicated. The Cooperative makes service available using digital subscriber line (DSL) technology and CVC uses wireless technology to make broadband service available in the area indicated. The Cooperative and CVC are prepared to expand services beyond the current service area based upon customer demand and economic feasibility. CVC currently competes with 2 other major providers within this application area – one a provider of DSL service and the other a provider of cable modem service - in providing broadband access. This area does not meet the BIP/BTOP definition of unserved/underserved for last mile service.

Submitter: Moundridge Telephone Company

Comment: For the portion of this application that overlaps the Moundridge Telephone Company serving area, broadband of at least 768kbps downstream and 200kbps upstream is accessible to 100% of households and 100% of businesses. Additionally, Moundridge Telephone offers a 4Mbps downstream / 1 Mbps upstream service in this area. Lastly, Moundridge Telephone supplies broadband service to over 50% of the households in this area. Per the criteria defined for the stimulus program, this area is classified as served.

Submitter: American Broadband all exchanges

Comment: RBJ Corporation is the corporate parent of the Holway Telephone Company and the K.L.M. Telephone Company. Holway and K.L.M. are incumbent local exchange carriers (ILECs), which are authorized by the Missouri Public Service Commission (PSC) and the Federal Communications Commission (FCC) to provide advanced and reliable telecommunications services ubiquitously throughout their designated serving areas in Missouri. Holway and K.L.M offer broadband internet and data services utilizing digital subscriber line (DSL) and fixed wireless technologies (Holway area only). Holway and K.L.M. offer 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 and K.L.M. broadband services that are offered within their designated serving areas that overlap with the WindTalk Last Mile Stimulus Application in Missouri. Holway and K.L.M. advertise broadband service alternatives that meet and exceed minimum download and upload speeds defined in the NOFA.

Holway and K.L.M. enjoy broadband penetration rates that exceed 40% of households in many of the census blocks contained within their serving areas, and this does not count/include the penetration of other broadband competitors that operate in the service area that WindTalk has applied for.

The WindTalk application overlaps with 1,087 census blocks in which Holway and K.L.M. offer DSL and fixed wireless (Holway area only) broadband services. In these 1,087 census blocks, Holway and K.L.M. provide broadband service to 578 residential customers and 53 business customers. Holway and K.L.M. approach 28% penetration of residences by themselves in their combined service areas and this does not include the number of residences served by other broadband competitors. Thus, the overlap area in the WindTalk application is not unserved and it is not broadly underserved in many of the census blocks covered by its application. Furthermore, Holway and K.L.M. offer their broadband services at speeds that exceed the NOFA minimums and exceed 3 Mbps, and Holway and K.L.M. advertise speeds that exceed 3 Mbps.

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

1. WindTalk applied for Stimulus dollars in areas (Census Blocks) that are not unserved or underserved.

2.The WindTalk application is overly broad because it did not seek to perform validations of broadband penetration rates at the Census Block level, whereas Holway and K.L.M. currently provide, advertise, and track broadband penetration to the Census Block level within their 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.WindTalk proposes a 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. WindTalk 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

5.WindTalk's application overlaps with the designated service areas of Holway and K.L.M. It is not apparent that WindTalk has addressed the challenge of its application's ability to be economically sustainable in areas that lack population density, and are already served by multiple broadband 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 and K.L.M. have resident work forces, located within their designated serving areas in Missouri, and they have a history of sustained employment.

Submitter: MetroCast Communications of Mississippi, LLC

Comment: MetroCast Communications of Mississippi, LLC offers broadband service to a portion of the applicant's proposed service area passing approximately 97,000 households. MetroCast offers residential broadband transmission speeds in applicant's proposed service area up to 10Mbps downstream and 1Mbps upstream, with MetroCast's most highly-subscribed broadband service having a transmission speed of 7.0Mbps downstream and 512kbps upstream. MetroCast's business broadband service offerings start at 3Mbps downstream and 512kbps upstream, with advertised offerings of up to 15Mbps downstream and 3Mbps upstream. Higher business speeds are available with customized service options including direct fiber connections. Over 17% of the households and businesses within our service area currently subscribe to MetroCast broadband services. MetroCast is aware of other providers of high speed broadband service in applicant's proposed service area, including AT&T. According to an FCC report (<http://www.fcc.gov/wcb/iatd/comp.html>), as of June 30, 2008, up to 17 other companies reported providing high-speed service to this service area. Based on the information provided above, applicant's proposed service area certainly does not meet the definition of "unserved" or "underserved" as those two terms are defined in the NTIA/RUS NOFA.

MetroCast has invested millions of dollars of private capital to build advanced fiber optic networks to provide broadband services in the communities it serves.

Further details regarding the broadband services MetroCast provides in applicant's proposed service area are provided below.

Submitter: Citizens Telephone Company of Higginsville, MO

Comment: WindTalk's proposed project covers the Northern portion of the exchanges served by Citizens Telephone Company of Higginsville, Mo (Citizens). Citizens currently serves all its service territory by an extensive existing fiber and copper network. These areas are currently capable of receiving high speed broadband access at speeds up to 12 mbps down. As such, these areas are "SERVED" based on the definitions as established in the Notice of Funds Availability (NOFA). In this public notice response Citizens is providing; 1) a map of the overlapping area where Citizens provides broadband services, 2) Citizens DSL high speed Internet advertising 3) the number of residential households and business establishments capable of receiving broadband services from Citizens 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. Citizens contends there is an error in the mapping tool database. The business polygon is listing 224 businesses, when there are actually two known businesses in the serving area and Citizens is currently providing service to both.

Submitter: Nebraska Central Telephone Co.

Comment: The respondent (Nebraska Central Telephone Company) is a Local Exchange Carrier (Common Carrier) that offers facilities-based, terrestrial Broadband (high speed) Internet access service in the overlap area of the PFSA.

The respondent's overlap area of applicant's PFSA contains 7,131 households. Respondent provides Broadband Internet access service (as defined in the NOFA) exceeding 768K downstream and 200K upstream speeds to 100% of the households and businesses in its response polygon. Therefore, the PFSA does not qualify as "underserved" based on the availability criterion.

In response to the PFSA, respondent's advertising copy has been uploaded showing the availability and advertising of service tiers of Broadband speeds up to 5MB downstream and 1 MB upstream, so the PFSA does not qualify as underserved based on the 3Mbps criterion.

The third qualifying criterion for underserved areas requires the use of company specific market data, and is addressed in the Proprietary Comments section.

Submitter: Franklin Telephone Company, Inc.

Comment: Respondent, Franklin Telephone Company, Inc., is a privately held Mississippi corporation and rural incumbent local exchange carrier which provides telecommunications, video, and broadband data services to residents in its licensed service areas. Over the years Respondent has utilized funds, including Rural Utilities Service funds, to invest in its network to deploy fiber optic and other state of the art network technologies to provide the residents of its licensed service areas with robust and technologically advanced access to broadband services. Currently, Respondent provides access to broadband services to ninety-eight percent (98%) of the residents in Respondent's service area. Therefore, no portion of Respondent's service area, including those which overlap with Applicant's proposed service area, are unserved.

Submitter: Eastex Telephone Cooperative, Inc.

Comment: Eastex Telephone Cooperative, Inc. is an ILEC providing reliable terrestrial broadband data service within portions of the proposed funding area. In Eastex's many years of experience within this rural service territory, wireless services are unlikely to be able to provide reliable broadband service throughout the area due to the size and density of local pine trees.

Submitter: Wilson Telephone Co Inc dba Wilson Communications

Comment: Wilson Communications has been providing high quality and leading technology telecommunications services to rural Kansans for more than sixty years. Wilson Communications began offering high speed internet access service to our customers in the late 1990's. We continued to expand our fiber network and now can provide broadband services to 100% of our customers. Wilson Communications continues to make investments in fiber optic facilities to ensure our customers have access to the latest broadband technology. We provide broadband to critical community anchor institutions including schools, rural health clinics, and public libraries. We are a full service provider of communications services and are able to bundle services offering discounts to our customers. Wilson

Communications is a community based company, providing volunteerism, and other forms of support to each of the seven communities we serve.

Submitter: Fidelity Communications Co. and subsidiaries

Comment: Fidelity is an ILEC, CLEC, cable TV and internet service provider, who serves a portion of the Applicant's proposed funded underserved service area. Fidelity Communications provides service through its wholly-owned subsidiaries: Fidelity Telephone Co, Fidelity Communications Services I, Fidelity Cablevision and Fidelity Networks. The specific areas served by Fidelity include the city limits of Sullivan, Owensville, Gerald, Rosebud, Salem, Lebanon, and Rolla, Missouri and some surrounding areas of Franklin, Gasconade, Washington, Dent, Laclede, Phelps and Crawford counties. Fidelity has built a robust fiber, coax and copper network providing a large number of subscribers with a package of voice, video and broadband services. Fidelity has provided quality broadband service via DSL and cable modems in these areas since as early as 2000 with current speeds up to 15Mbps.

Submitter: Cox Communications Inc.

Comment: Cox Communications, Inc. (Cox) is a broadband communications and entertainment company, providing advanced digital video, Internet, telephone and wireless services over its nationwide IP network. The third-largest U.S. cable TV company, Cox serves over 6.2 million residences and businesses.

Cox operates in hundreds of communities in 18 states and has invested over \$16 billion in private capital in its network over the last ten years. Cox provides its customers in Louisiana with 21st century infrastructure that provides advanced broadband, video and telephone services. More than 99.5 percent of the households in our service areas have access to Cox high-speed Internet, at some of the fastest broadband speeds available in the nation.

Cox supports the goals of the American Recovery and Reinvestment Act to extend broadband to parts of the country that are unserved or underserved. We appreciate the efforts of the Rural Utilities Service and the National Telecommunications and Information Administration in making sure that the limited amount of broadband stimulus funding available under the ARRA is targeted toward those consumers in greatest need, rather than to areas that already have access to broadband service.

To assist your agencies in ensuring that ARRA funds are directed to truly unserved and underserved areas, Cox is providing supplemental information that demonstrates, for the above-referenced

application, the following: the location of Cox's broadband infrastructure; broadband service levels provided; number of customers served; pricing for each service tier; and marketing materials which demonstrate service availability. Consistent with the statutory requirement to expend funds only for projects in eligible areas, we trust that your agencies will use this information -- along with information from other broadband providers -- to obtain a clear picture of service availability in the area covered by the application. We encourage the use of independent due diligence to determine the extent of other broadband service offerings in the proposed funded service area covered by this submission, if other providers fail to submit information prior to the submission deadline.

We request that this data be treated as confidential and proprietary. Much of the information provided with this letter constitutes trade secrets or commercial information that is privileged and confidential and therefore exempt from public disclosure under 5 U.S.C. § 552(b)(4). Cox does not disclose this information to the public, and release of this information could cause competitive harm, by enabling other broadband providers to tailor their business strategies to unfairly compete with Cox.

Thank you for the opportunity to submit this information. We trust that it will be helpful in your analysis, and will inform your final decision concerning the application.

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: Santa Rosa Telephone Cooperative, Inc.

Comment: Santa Rosa Telephone Cooperative, Inc. provides comments on this application regarding the underserved designation of the proposed funded area.

Submitter: ATC Communications

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

Submitter: The Tri-County Telephone Association, Inc.

Comment: The Tri-County Telephone Association, Inc. (TCT) has been providing high-quality communications services to rural Kansas for over 46 years. During this time, there has been much technological advancement, providing new services. TCT is committed to providing our customers with advanced, reliable communications service, regardless of where they live and work.

In 2001, TCT proved this commitment by making substantial investment in upgrading its core facilities including digital switches and a fiber fed network. This cutting-edge technology allowed TCT to offer advanced communication services, including broadband access to 100% of its service areas. TCT, in looking toward the future, has embarked on a Fiber-To-The-Home (FTTH) project that, by the time it is complete in 2013, will connect every home and business in its service areas to fiber-speed bandwidth.

TCT is a local company that anchors the communities it serves. It provides much-needed jobs, 24-7 customer service and local offices. TCT provides necessary broadband services to community anchor institutions including schools, libraries, local government offices and public safety agencies. It serves from a local perspective because TCT's owners, who are also its customers, have a personal stake in the communities where they work and live.

Recently, TCT committed to further serve our customers by creating the TCT Community Development Initiative. This initiative supports infrastructures to attract new residents and businesses to TCT communities. TCT, one of the largest employers in the area, provides assistance in business development for both new and existing businesses. TCT will also acts as a liaison between local, state, and national economic development groups and contributes in local Community Development Groups.

Submitter: Charter Communications

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

Submitter: Fulton Telephone Company, Inc.

Comment: Fulton Telephone Company is Itawamba County's incumbent local exchange carrier and a Rural Utilities Service borrower whose fiber-fed network is capable of providing 90% of its residences and businesses download rates of at least 3 megabits per second and upload rates of at least 768 kilobits per second; 98% of its residences and businesses download rates of at least 1.5 megabits per second and upload rates of at least 768k; and 100% of its residences and businesses download and upload rates of at least 768 kilobits per second.

Submitter: Mark Twain Rural Telephone Company

Comment: The application submitted by WindTalk Inc. contains inaccurate and incomplete information and, consistent with the NOFA, should be rejected. WindTalk Inc. 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. Mark Twain herein provides proof that all subscribers in the designated areas served by Mark Twain have access to adequate and affordable 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 NOFA rules and regulations posted by NTIA and RUS.

Submitter: Central Oklahoma Telephone Co.

Comment: Central Oklahoma Telephone Company has been offering broadband speed data service to subscribers for 10 years. The area applied for by the ARRA applicant, which falls within the telephone exchange boundary is served with high speed internet broadband service.

Submitter: Salina Spavinaw Telephone Company, Inc.

Comment: The area that Salina Spavinaw Telephone Company, Inc. serves is neither underserved or unserved. We have purchased new equipment since June 30, 2009 that will enable our company to

serve at least 90% of households in this service area. The service will be downloads of at least 768K and up to 3.0Mbps.

Submitter: BWTelcom

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

Submitter: McDonough Telephone Coop

Comment: WindTalk Inc.'s proposed project covers portions of the exchanges served by McDonough Telephone Coop. We currently serve the exchange areas by an existing Fiber-to-the-Node and Fiber-to-the-Home network. In the public notice response McDonough Telephone Coop is providing; 1) a map of the overlapping area McDonough provides broadband services, 2) McDonough's DSL high speed internet advertising 3) the number of residential households and business establishments capable of receiving broadband services, 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: Grand Telephone Co. Inc.

Comment: The area in which the applicant WindTalk Inc. has filed a stimulus application defining an underserved area, a portion of WindTalk Inc. application area is currently served with Broadband by Grand Telephone. Over the last seven years Grand Telephone has made and maintained significant investments to provide 768 kbps broadband speeds to all establishments in its serving area. Grand Telephone advertises the availability of 3 Mb Broadband Speeds to all establishments within its Jay and Disney exchanges.

Submitter: Hamilton.net, Inc.

Comment: DSL continues to be offered in the eastern section of our response area. With DSL our standard packages offer speeds from 768k down/256k up to 6Mb down/512Mb up.. In addition to DSL, in the majority of our response area we offer unmetered stationary broadband services using 3G 1XEVD0/Rev A. Our brand name for this service is "GMAX" and has a maximum download speed of

3.1Mb. This service is configured as a data only solution and is intended to offer a competitive alternative to DSL and cable modem service. We also offer unlicensed wireless services in portions of this area as well with 768k down/ 768 up speeds

Submitter: H&B Communications

Comment: H&B provides broadband speeds of up to 10Mbps to the entire Holyrood, Bushton and Dorrance telephone exchanges in central Kansas. They also provide broadband speeds of up to 6Mbps within the city limits of Claflin, Chase, and Lorraine, Kansas. These areas all qualify as served according to the NoFA definitions.

Submitter: Dobson Telephone Company

Comment: Dobson Telephone Company challenges the application of WindTalk, Inc. based on their declaration of the serving area being underserved.

Submitter: LBH, L.L.C.

Comment: LBH, L.L.C. has been offering High Speed Broadband Service throughout its service area in Grand Lake for six years and in Moss Bluff for three years. The service is provided using FTTH technology.

Submitter: Reveille Broadband

Comment: Reveille Broadband has a State of Texas issued franchise to operate its system in the City of Lexington. It was issued in June 2008 when it's franchise with the City expired. Reveille Broadband constructed its hybrid fiber/coax network in 2005 and began offering advanced services in the community in 2006. Reveille offers a bundled service of video, voice and data as well as ala carte for video or data. Reveille competes for its customers with Verizon for video, voice and data as well as the incumbent wireless provider Cobalt, who is the recipient of a previous RUS Broadband grant.

Submitter: Totah Communications, Inc.

Comment: Totah Communications, Inc.

OMB Control Number: 0660-0031

OMB Control Number: 0572-0142

WindTalk, in its extremely large multi-state ARRA funding applications has incorrectly filed for ARRA funding for areas that include all of Totah Communications, Inc.'s (Totah) rural exchange area in Oklahoma and Kansas. WindTalk has incorrectly identified the following Totah exchange areas in Oklahoma as underserved in their entirety; Talala, Lenapah, Wann, Ochelata, South Elgin, Oglesby, South Hewins and Burbank. In addition WindTalk has also miss-stated information regarding the following Totah exchange areas in Kansas as being underserved in their entirety; Tyro, Elgin, Liberty, Hewins, Elk City and Havana. WindTalk is wrong in their assertion and blanket filing. In Totah's Oklahoma service territory Oglesby and Burbank are currently being served throughout with broadband speeds equal to or in excess of 768 kbps. Similarly for Totah's Kansas service territory Tyro, Liberty, Elk City and Havana are completely served throughout with broadband speeds equal to or in excess of 768 kbps. Totah's remaining exchange areas in Kansas and Oklahoma only have limited portions of their service area in which 768 kbps speeds are not available. In addition the vast majority of these exchange areas also have service being provided by cable providers as well as multiple wireless service providers. In the limited areas in which 768 kbps are not currently provided, Totah is still providing Internet access. Additionally, Totah has requested ARRA funds in order to upgrade those limited areas with speeds equal to or in excess of 3 Mbps.

We strongly oppose WindTalk's filing and their request for funds on the basis that they have incorrectly identified the service area of Totah in its entirety as underserved when Totah is providing broadband access at speeds equal to or greater than 768 kbps throughout most of their exchanges. We recommend that the WindTalk application regarding the Totah exchanges in Oklahoma be rejected.

If you have any questions, or need additional information please do not hesitate to contact us.

Sincerely,

Keith E. Watson

Totah Communications, Inc.

Submitter: Cameron Telephone Company, L.L.C.

Comment: Cameron Telephone Company has been offering high speed broadband service throughout its exchanges for nine years. The area applied for by the ARRA applicant is served with 3 Mbps service.

Submitter: Tel-Star Cablevision Inc

Comment: We are a communications company providing video, phone and high speed internet service to some of the rural areas included in the WindTalk Inc proposed service area application. Our service offering includes internet download speeds of 4Mbps. This rivals those offered in larger communities.

Submitter: Haviland Telephone Co., Inc.

Comment: Haviland Telephone Co., Inc. provides Digital Subscriber Line broadband service in Kiowa, Comanche, Barber, Pratt, Kingman, Harper, Sumner and Sedgewick County, KS at speeds exceeding the NOFA definition. The service is offered at every customer location. This includes the towns of Wilmore, Mullinville, Haviland, Coats, Cullison, Sawyer, Isabel, Nashville, Conway Springs, Argonia, Norwich, Milton, Milan, Riverdale and adjacent rural areas.

Submitter: Oneida Telephone Exchange

Comment: WindTalk Inc.'s proposed project covers approximately 100% of the exchange served by Oneida Telephone Exchange. We currently serve the exchange over copper twisted pairs network that extends from our corporate headquarters in Oneida, IL. In the public notice response Oneida is providing; 1) a map of the overlapping area Oneida provides broadband services, 2) Oneida's DSL high speed internet advertising 3) the number of residential households and business establishments capable of receiving broadband services, 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: 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.

WindTalk has submitted a last mile broadband stimulus application that overlaps the American Broadband – Nebraska exchange serving areas. The WindTalk application overlaps with 9,505 census blocks in which American Broadband – Nebraska offers broadband services using DSL technology. In these 9,505 census blocks, American Broadband - Nebraska provides broadband service to 4,654 residential customers and 582 business customers. American Broadband - Nebraska approaches penetration of nearly 50% 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 WindTalk 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 WindTalk stimulus application should be rejected for several reasons, which include but are not limited to:

1. WindTalk applied for Stimulus dollars in areas (Census Blocks) that are not unserved or underserved.
2. The WindTalk 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. WindTalk 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. WindTalk is only one of several wireless providers within the geography applied for that offer wireless data services (Verizon, AllTel, Viaero, etc.)
5. WindTalk's application overlaps with the designated service area of American Broadband - Nebraska. It is not apparent that WindTalk 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.

Submitter: Mutual Telephone Company

Comment: Mutual Telephone Company is a cooperative telephone company headquartered in Little River, KS. MTC has been in operation for 104 years. Through the organization and its subsidiary company, high-speed internet is available throughout all of Rice County, northern Reno County and western McPherson County in central Kansas.

Submitter: Southwest Arkansas Telephone Cooperative, Inc.

Comment: In the Bloomburg exchange - Southwest Arkansas Telephone Cooperative (SWAT) objects to the classification of the proposed area being designated as underserved. SWAT provides access to consumers of facilities-based broadband transmission speeds of at least 768 kilobits to 100% of the Proposed Funded Service Area. Swat advertises 3 megabit service in the proposed service area. Not only does SWAT provide services to this area, but two wireless broadband service providers also compete and advertise broadband services of speeds up to and over 5 megabits in the proposed funded service area. SWAT believes that, when coupled with the two broadband wireless providers, the penetration rate of broadband access is over 40% in the proposed service area. SWAT has invested extensively in the proposed funded service area to bring consumers the latest broadband technologies. Therefore this application should be rejected based on the above statements. In the Doddridge exchange - Southwest Arkansas Telephone Cooperative (SWAT) objects to the classification of the proposed area being designated as underserved. SWAT provides access to consumers of facilities-based broadband transmission speeds of at least 768 kilobits to 100% of the Proposed Funded Service Area. Swat advertises 3 megabit service in the proposed service area. Not only does SWAT provide services to this area, but two wireless broadband service providers also compete and advertise broadband services of speeds up to and over 5 megabits in the proposed funded service area. SWAT believes that, when coupled with the two broadband wireless providers, the penetration rate of broadband access is over 40% in the proposed service area. SWAT has invested extensively in the proposed funded service area to bring consumers the latest broadband technologies. Therefore this application should be rejected based on the above statements. In the Fouke Exchange - Southwest Arkansas Telephone Cooperative (SWAT) objects to the classification of the proposed area being designated as underserved. SWAT provides access to consumers of facilities-based broadband transmission speeds of at least 768 kilobits

to 100% of the Proposed Funded Service Area. Swat advertises 3 megabit service in the proposed service area. Not only does SWAT provide services to this area, but two wireless broadband service providers also compete and advertise broadband services of speeds up to and over 5 megabits in the proposed funded service area. SWAT believes that, when coupled with the two broadband wireless providers, the penetration rate of broadband access is over 40% in the proposed service area. SWAT has invested extensively in the proposed funded service area to bring consumers the latest broadband technologies. Therefore this application should be rejected based on the above statements. In the Fulton exchange - Southwest Arkansas Telephone Cooperative (SWAT) objects to the classification of the proposed area being designated as underserved. SWAT provides access to consumers of facilities-based broadband transmission speeds of at least 768 kilobits to 100% of the Proposed Funded Service Area. Swat advertises 3 megabit service in the proposed service area. Not only does SWAT provide services to this area, but two wireless broadband service providers also compete and advertise broadband services of speeds up to and over 5 megabits in the proposed funded service area. SWAT believes that, when coupled with the two broadband wireless providers, the penetration rate of broadband access is over 40% in the proposed service area. SWAT has invested extensively in the proposed funded service area to bring consumers the latest broadband technologies. Therefore this application should be rejected based on the above statements. In the Garland exchange - Southwest Arkansas Telephone Cooperative (SWAT) objects to the classification of the proposed area being designated as underserved. SWAT provides access to consumers of facilities-based broadband transmission speeds of at least 768 kilobits to 100% of the Proposed Funded Service Area. Swat advertises 3 megabit service in the proposed service area. Not only does SWAT provide services to this area, but two wireless broadband service providers also compete and advertise broadband services of speeds up to and over 5 megabits in the proposed funded service area. SWAT believes that, when coupled with the two broadband wireless providers, the penetration rate of broadband access is over 40% in the proposed service area. SWAT has invested extensively in the proposed funded service area to bring consumers the latest broadband technologies. Therefore this application should be rejected based on the above statements. In the Trigg exchange - Southwest Arkansas Telephone Cooperative (SWAT) objects to the classification of the proposed area being designated as underserved. SWAT provides access to consumers of facilities-based broadband transmission speeds of at least 768 kilobits to 100% of the Proposed Funded Service Area. Swat advertises 3 megabit service in the proposed service area. Not only does SWAT provide services to this area, but two wireless broadband service providers also compete and advertise broadband services of speeds up to and over 5 megabits in the proposed funded service area. SWAT believes that, when coupled with the two broadband wireless providers, the penetration rate of broadband access is over 40% in the proposed service area. SWAT has invested extensively in the proposed funded service area to bring consumers the latest broadband technologies. Therefore this application should be rejected based on the above statements.

Submitter: South Central Telephone Association, SCTelcom

Comment: SCTA, established in 1953, is submitting a response to dispute service availability for a portion of the applicant's area. We would like to establish the fact that we are providing broadband

access exceeding the 768 Kbps minimum as defined by the NOFA. We have been advertising High speed Broadband service of 1.5, 3, and 6Mbps in our response area.

Submitter: Bruce Telephone Company

Comment: Bruce Telephone Company is the incumbent local exchange carrier for Bruce, Pittsboro, and approximately half of Calhoun County. The company is a Rural Utilities Service borrower whose network is capable of providing 30% of its residences and businesses download rates of at least 3 megabits per second and upload rates of at least 768 kilobits per second; 75% of its residences and businesses download rates of at least 1.5 megabits per second and upload rates of at least 768 kilobits per second; and 90% of its residences and businesses download and upload rates of at least 768 kilobits per second. A multimillion dollar Fiber to the Home project, funded by Rural Utilities Service, was awarded to Bruce Telephone Company, in 2009. Upon completion, the upgrade project will insure a minimum of 3 megabit download and upload speeds to 100% of the businesses and residences in the certificated area.

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

Comment: • 100% of Green Hills' service area has access to facilities based Broadband in excess of 768k down/200k up speeds.

- Green Hills' advertises and provides multiple service speeds including an offering with 3 Meg down.
- Green Hills' broadband subscriber take rate exceeds 53% in the Green Hills service area that overlaps the proposed funded service area.

Submitter: Cross Telephone Company LLC

Comment: Cross Telephone Company LLC through its subsidiary, Cross Cable Television, Inc., has been offering broadband speed data service to subscribers for over 5 years. The area applied for by the ARRA applicant, which falls within the telephone exchange boundary is served with high speed internet broadband service. Cross Cable Television, Inc. also offers IPTV service to its subscribers within the exchanges Cross serves.

Submitter: Time Warner Cable

Comment: As shown in the attached map and exhibit, TWC currently provides broadband Internet access service in the Proposed Funded Service Area. In addition, we advertise service of speeds above 3 Mbps throughout this service area. We pass over 50% of households, and either (1) have actual broadband subscribership of over 40% of the households in these census blocks or (2) the combined broadband subscribership of the wireline broadband providers (including TWC) in these census blocks is reasonably likely to exceed 40%. Therefore, that portion of the proposed funded service area that overlaps Respondent's service area reflected in this response is neither "unserved" or "underserved."

Submitter: Wisper ISP Inc.

Comment: We are a High Speed Wireless company that has been serving the mapped area for 6+ years with great success. We advertise packages ranging from 1Mbps to 5Mbps in every town we service. We also do custom links up to Gigabit speeds which have been done successfully for several businesses. We have a network of over 130 towers ranging in height from 30 ft to 1,500 ft in our coverage areas and this number is ever growing. We work with many

city governments and have provided private wireless links for several city Police, Fire, water and park departments. When considering the numbers we have submitted please remember that the overall percentages of coverage will look low because our network covers metro as well as rural towns. In Metro areas we are a small competitor with the major telco and cable providers. We also have several wireless competitors in the rural areas including Celerity Wireless, Tin Cans, HTC to name a few. Our Customer statistics show 10 to 65% subscription rate with Wisper ISP alone in these rural areas. They also show that over 85% of rural homes in these areas have access to our towers as well as the towers of our competitors. As our tower numbers grow and technology gets better our converge area expands dramatically. We therefore submit that our area is not Unserved and/or Underserved. Wisper ISP Inc. has already been providing high speed wireless internet to the rural communities of our area with a 6+ year track record of success. Wisper has 21 dedicated employees and their families providing service to 3,500+ customers. The Federal money would be better used in other areas that are truly unserved/underserved.

Submitter: Bright House Networks, LLC

Comment: In support of NTIA and RUS' efforts to optimize the distribution of the scarce resources available under the ARRA Broadband NOFA, Bright House Networks is providing additional data related to this Applicant's planned service areas. This application includes service areas which are not unserved nor underserved.

Submitter: Diller Telephone Company

Comment: Diller Telephone Company (DTC) provides broadband internet service at download speeds up to 1.5 Mbps. 100% of the households in the DTC service area are capable of receiving broadband internet service of at least 768kbps/200kbps. The subscriber rate is greater than 40% for the DTC service area.

Submitter: Grand River Mutual Telephone Company

Comment: Grand River Mutual Telephone Company is capable of providing broadband at speeds of at least 768Kbps down and 200 Kbps up to 100% of its customers in all of its exchanges where WindTalk's application overlaps GRM's service territory with the majority of customers able to receive broadband at 3.0 Mbps. Over 90% of GRM's broadband customers receive service at 6.0 Mbps. GRM's territory is neither unserved nor underserved.

Submitter: Roanoke Telephone Company, Inc.

Comment: Since 1902 Roanoke Telephone Company, Inc. (RTC) has served as the existing Incumbent Local Exchange Company (ILEC) for 2 exchange areas within the rural counties of Chambers and Randolph in the State of Alabama, portions of which are proposed to be served by WindTalk Inc. in their ARRA Broadband Stimulus application.

RTC currently advertises and provides broadband services, at speeds up to 3 Mbps to residential and up to 10 Gbps to business subscribers within the area proposed by this applicant. In addition, broadband service, at speeds greatly in excess of the minimum broadband speed defined by the ARRA NOFA is currently available, through the DSL and Fiber to the Home distribution plant of RTC, to 100% of homes and businesses within the RTC service territory. This has been confirmed by Governor Riley's "ConnectingALABAMA" Broadband Availability mapping project. The area proposed to be served by the applicant contains 16,21,791 households according to the 2000 U.S. Census, of which 167 residential and business subscribers are already served by RTC. For these reasons the applicant's request for funding to overbuild areas already served by RTC should be denied.

Submitter: Xfone USA, Inc.

Comment: Xfone USA, Inc. currently provides Broadband Services at download speeds greater than 3 mbps to the communities of Jackson, MS, Baton Rouge, LA, and New Orleans, LA.

Submitter: Shidler Telephone Company

Comment: Shidler Telephone Company is an RUS borrower and currently provides broadband access capability to 100% of the households within its service territory. As of June 30, 2009, Shidler provided broadband to over 41% of its residential customers with 44% of those customers subscribing to either an enhanced or premium broadband plan, both of which exceed 768Kbps speed. Shidler's premium broadband service provides downstream speeds of 1.5Mbps. Shidler continues to invest in its broadband network and plans to offer 3Mbps broadband service to its subscribers. Each of Shidler's broadband internet service offerings are priced competitively as is apparent from Shidler's high subscriber penetration. Clearly, the portion of the "PFSA" that encompasses Shidler Telephone Company's serving territory is not unserved or underserved.

Submitter: Walnut Hill Telephone Co.

Comment: Walnut Hill Telephone Company demonstrates that the application filed by WindTalk, Inc. is incorrect in its claim that the area it proposes to serve which overlaps Walnut Hill Telephone's service area is unserved. Further, Walnut Hill Telephone demonstrates that the area WindTalk, Inc. proposes to serve which overlaps Walnut Hill Telephone's service area does not meet all of the criteria which categorize an area as underserved.

As demonstrated, 99.8% of households in Walnut Hill Telephone's service area, including those areas which are part of WindTalk, Inc.'s proposed funded service area, are able to readily subscribe upon request to facilities-based, terrestrial broadband services at a minimum transmission speed of greater than 768 kbps downstream and 200 kbps upstream from Walnut Hill Telephone. Therefore, WindTalk, Inc.'s claim that this overlapping area is unserved is incorrect. Further, no part of this overlapping area is underserved on the basis of access to broadband service. In addition, Walnut Hill Telephone demonstrates that the rate of broadband subscribership for households in [the part of the proposed funded service area which overlaps Walnut Hill Telephone's service area] [its service area] is significant.

Submitter: Henderson Cooperative Telephone Company

Comment: Henderson Cooperative Telephone Company, dba Mainstay Communications, currently provides service in its certificated exchange area that meets or exceeds all ARRA NOFA requirements to be classified as a "Served" area. 100% of the households have access to Broadband service of at least

768/200 Kbps. The current residential penetration rate of Broadband service at a speed of 768/200 Kbps or higher is 63%. Henderson Cooperative Telephone offers a 5 Mbps Broadband service.

Submitter: Elizabeth Telephone Co.

Comment: Elizabeth Telephone Company has been offering High Speed Broadband Service throughout its exchanges for nine years. The area applied for by the applicant is served with over 3 Mbps service.

Submitter: NewWave Communications

Comment: Multiple proposed Illinois service areas are already served by NewWave and various other providers. Percentage of data customers vs. homes passed: Greenville 21%, Vandalia/Ramsey/Brownstown 21.5%; Carlinville/Girard/Gillespie 5%; Norris City 8%; Sparta 15% and Fairfield 10%. 3 MG or higher is available to all.

In Arkansas, NewWave Communications provides 46.5 percent broadband market penetration with 100 percent of that service being 3MB or higher. 38 percent of Clay County is served. Four percent of Green County is served.

In Missouri, NewWave Communications has a 47% broadband market penetration and 100% or greater than 3 MG service. NewWave serves 42% of Stoddard County and 26% of Dunklin County.

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 many of these particular markets. As a result, this market is adequately serviced by NewWave and its competitors.

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: Madison County Telephone Company

Comment: In the Huntsville, Kingston, Aurora, and Forum exchanges - Madison County Telephone Company objects to the classification of the proposed area being designated as underserved. Madison County provides access to consumers of facilities-based broadband transmission speeds of at least 768 kilobits to 100% of the Proposed Funded Service Area. Not only does Madison County provide services to this area, but two wireless broadband service providers also compete and advertise broadband services of speeds up to and over 5 megabits in the proposed funded service area. Madison County believes that, when coupled with the two broadband wireless providers, the penetration rate of broadband access is over 40% in the proposed service area. Madison County has invested extensively in the proposed funded service area to bring consumers the latest broadband technologies. Therefore this application should be rejected based on the above statements.

Submitter: Pioneer Telephone Cooperative

Comment: Pioneer Telephone Cooperative, Inc. through its subsidiary Pioneer Long Distance, Inc. (PLDI), has been offering broadband speed data service to subscribers for over 10 years. The area applied for by the ARRA applicant, which falls within the telephone exchange boundary is served with high speed internet broadband service. PLDI also offers IPTV service to its subscribers in the towns using the Pioneer's broadband plant.

Submitter: Big Bend Telephone Co.

Comment: Big Bend Telephone Company, Inc. is an ILEC currently providing terrestrial broadband data service within portions of the proposed funding area. Big Bend Telephone has served this area as the provider of last resort since 1960 and currently provides broadband service throughout 100% of its rural service territory.

Submitter: TV Cable of Grayson County

Comment: Grayson County Cable (GCC) currently provides a wide array of broadband offerings within the proposed funded service area. GCC has been offering broadband services in excess of the 3 MB bandwidth requirement as set forth in the ARRA, NOFA and BIP/BTOP guidelines, all prior to the ARRA approval. GCC's service area already provides for "sufficient access to broadband service to facilitate rural economic development", as well as allows for choice of service providers through competing with Incumbent Local Exchange Carriers, and allows for leasing of services through our own facilities. The proposed funded service area already provides for not only broadband service through GCC, but several ILEC's, Wireless companies, and numerous mobile broadband service providers offer several choices to the subscriber. GCC's opinion of the proposed funded service area is that of unnecessary spending within areas where sufficient broadband offerings exist to meet current demands. Whereas the requested funding could be better utilized in other portions of the country to deploy, map, or support other broadband services in accordance with the ARRA, NOFA and BIP/BTOP programs. Through funding the proposed service area, excessive competition will be created for all, which may create a short term economic boost, but have severe long term ramifications which may force current stable and thriving service providers to close or consolidate business, leading to layoffs and resulting in another economic downturn.

Submitter: Cable One, Inc.

Comment: Cable One, Inc. is a multi-system broadband provider operating in 19 states. Cable One offers residential broadband service with speeds up to 10 MB and customizable commercial solutions with flexible bandwidth offerings from 5Mbps to 1 Gbps. By November 1, 2009, the majority of Cable One systems will also be offering 12 Mb residential broadband service with a 20 MB boost. Cable One provides its subscribers with quality service offerings at competitive rates. Cable One expends substantial capital and resources to ensure that customers enjoy the latest technology and the highest standards of customer service, and has made its customers and its communities its first priority.

Please refer to our supporting documentation and comments that establish that Cable One already operates in census tract(s) encompassing or included in Applicant's Proposed Funded Service Area. The uploaded document includes maps showing census tracts and homes passed for each the applicable systems, current advertisements for residential and commercial broadband offerings, and subscriber data by census tract.

Cable one's current broadband service offerings are as follows:

Residential:

Economy, Speed (Down/up) - 1.5 Mb/150 kbps, Service Rate - \$20.00

Standard , Speed (Down/up) - 5 Mb/500 kbps, Service Rate - \$43.00

Premium, Speed (Down/up) - 10 Mb/1 Mb, Service Rate - \$53.00

Commercial:

Economy, Speed (Down/up) - 5 Mb/1.0 Mb, Service Rate - \$69.65

Standard, Speed (Down/up) - 10.0 Mb/1.0 Mb, Service Rate - \$85.95

Premium, Speed (Down/up) - 12.0 Mb/1.5 Mb, Service Rate - \$99.95

Ultra, Speed (Down/up) - 15.0 Mb/2.0 Mb, Service Rate - \$199.95

Enterprise Plus, Speed (Down/up) - 20.0 Mb/2.5 Mb, Service Rate - \$299.95

Discounted bundles and promotional pricing are also available.

Submitter: North Texas Broadband

Comment: North Texas Broadband (NTBB) currently provides a wide array of broadband offerings within the proposed funded service area. NTBB has been offering broadband services in excess of the 3 MB bandwidth requirement as set forth in the ARRA, NOFA and BIP/BTOP guidelines, all prior to the ARRA approval. NTBB's service area already provides for "sufficient access to broadband service to facilitate rural economic development", as well as allows for choice of service providers through competing with Incumbent Local Exchange Carriers, and allows for leasing of services through our own facilities. The proposed funded service area already provides for not only broadband service through NTBB, but several ILEC's, Wireless companies, and numerous mobile broadband service providers offer several choices to the subscriber. NTBB's opinion of the proposed funded service area is that of unnecessary spending within areas where sufficient broadband offerings exist to meet current demands. Whereas the requested funding could be better utilized in other portions of the country to deploy, map, or support other broadband services in accordance with the ARRA, NOFA and BIP/BTOP programs. Through funding the proposed service area, excessive competition will be created for all, which may create a short term economic boost, but have severe long term ramifications which may force current stable and thriving service providers to close or consolidate business, leading to layoffs and resulting in another economic downturn.

Submitter: Millry Communications, Inc.

Comment: The broadband services are offered by utilizing the network and resources of Millry Telephone Co., Inc., an ILEC that has provided Broadband since 2002. Ninety-seven percent of the local telephone service area has access to Broadband Service. We have continually reduced our pricing to attempt to accommodate the affordability of the service and increased speed to accommodate the demands of the market. By deploying additional fiber and carrier equipment within the network, the area is “served” to the last mile customer.

Submitter: Harrisonville Telephone Company

Comment: Harrisonville Telephone Company provides comments on this application regarding the underserved designation of the proposed funded area.

Submitter: Beggs Telephone Company, Inc

Comment: Beggs Telephone Company has recently upgraded DSL service to the City of Beggs and Town of Winchester and is now offering speeds up to 6 mbps service to these communities and surrounding areas. This includes 100% of all households in the City of Beggs and Town of Winchester and 74% of the 1580 households in our exchange. Currently a construction project to upgrade DSL service to even more of our service area is taking place, which will raise the percentage to 87% of our customers capable of receiving up to 6 mbps service in our service area. Beggs Telephone Company does offer 1.5 mbps to all of our service area. We began offering DSL Service in August 2001.

Submitter: Blue Valley Tele-Communications, Inc.

Comment: Blue Valley Tele-Communications, Inc. (BVTC) is a rural telephone cooperative that has been serving these remote and rural communities for over 50 years. BVTC was one of the first companies in the nation to offer High-Speed DSL to both in-town and rural customers no matter the distance from the central office. BVTC is also building for future applications and higher demands for broadband by investing in a fiber to the premise network that will reach 100% of its customers in their telephone exchanges, and was one of the first companies in the nation to attempt this type of network. On top of these offerings, BVTC offers Internet services via cable modems and wireless technologies to many communities that lie outside of their ILEC telephone exchanges.

As a cooperative, BVTC services are driven by customer need and demand and customers are represented by a Board of Directors to make sure those needs are being met. The company also employs a full-time economic development director to assist in growth of their service areas. BVTC is proud to be known as an industry leader in the broadband arena, and plans to continue leading the way in broadband development in the future.

Submitter: Grafton Telephone Company, Inc.

Comment: Grafton Telephone Company provides comments on this application regarding the underserved designation of the proposed funded area.

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 WindTalk Inc. 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: Seneca Goodman and Ozark Telephone Companies

Comment: Seneca, Goodman, and Ozark Telephone Companies, an RUS/RDUP telecom loan program borrower, currently provides broadband internet service access to all establishments located within their certificated service areas. The lowest advertised broadband internet service package is 1 Mb downstream with 3 Mb internet service also being advertised. I.P. Video services are available throughout all exchange areas, further demonstrating and utilizing the capacity of the established broadband facilities. The Seneca Goodman and Ozark Telephone Companies have provided dedicated fiber access for broadband service transmission to schools located within their exchange areas, and in 2004 began providing broadband internet access in their certificated exchange areas of rural southwest Missouri, Northwest Arkansas, and Northeast Oklahoma. Currently several fixed broadband facility and nationwide wireless providers are competing for broadband services within the exchange areas of Seneca, Goodman, and Ozark Telephone Companies.

Submitter: Cozad Telephone Company

Comment: Cozad Telephone Company (CTC) provides wireline and wireless high speed broadband internet service at 3 Mbps downstream and 1 Mbps upstream. CTC is capable of delivering broadband internet to 100% of the households in its service territory.

Submitter: Gorham Telephone Company

Comment: For the portion of this application that overlaps the Gorham Telephone Company serving area, broadband of at least 768kbps downstream and 200kbps upstream is accessible to 100% of households and 100% of businesses. Additionally, Gorham Telephone Company offers a 3Mbps downstream service in this area. Lastly, Gorham Telephone Company 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: sci cable

Comment: Service area is broadband HFC with Video, High Speed Data, VOIP (VOIP launch date is 12-1-09)

Submitter: LaHarpe Telephone Co., Inc.

Comment: LaHarpe Telephone Company, Inc has expended more than \$2,500,000 of a loan from USDA to construct a fiber to the premises in LaHarpe, KS and the surrounding rural area. The fiber to the premises build is complete and the citizens in the area have one of the most advanced systems in the nation with internet capability in the range of 100M/sec. Overbuilding with grant money could put repayment of our loan in jeopardy.

Submitter: Industry Telephone Company

Comment: Industry Telephone Company provides this response to the WindTalk, Inc. application. The applicant's underserved designation of its service area does not apply to the portion of its service area which includes Industry Telephone Company, which overlaps the applicant's area. We provide broadband access to 100% of our existing service area.

Submitter: Coleman County Telephone Cooperative

Comment: Coleman County Telephone Cooperative serves the Burkett, Mozelle, Rockwood, Santa Anna, Lake Coleman, and Valera exchanges in the proposed funded service area of WindTalk located in Coleman, TX. The Cooperative provides access to broadband service to 100% of households in its exchanges and therefore the WindTalk PFSA does not appear to qualify as underserved area. Coleman's wireless affiliate provides 3 Mbps download speed to 75% of the PFSA.

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: Allegiance Communications, LLC

Comment: Allegiance Communications (Allegiance) currently provides a wide array of broadband offerings within the proposed funded service area. Allegiance has offered broadband services in excess of the 3 MB bandwidth requirement as set forth in the ARRA, NOFA and BIP/BTOP guidelines, all prior to the ARRA approval. Allegiance's service area already provides for "sufficient access to broadband service to facilitate rural economic development", as well as allows for choice of service providers through competing with Local Exchange Carriers, and allows for leasing of services through our own facilities. Allegiance's opinion of the proposed funded service area is that of excess spending where funds could be better used in other portions of the country to deploy broadband service in accordance with the ARRA, NOFA and BIP/BTOP programs. Through funding the proposed service area, excessive competition will be created for all, which may create a short term economic boost, but have severe long term ramifications which may force service providers out of business.

Submitter: Southeast Nebraska Communications

Comment: Southeast Nebraska Communications (SNC) provides standard high speed broadband internet service with download speeds up to 3 Mbps for an affordable rate of \$39.95/month; and offer download speeds of up to 5 Mbps. SNC offers internet access to 100% of the households in its service territory; and it has a subscriber rate of over 40% of households. There are no installation fees or contracts to sign for SNC's fast and reliable broadband service.

Submitter: MoKan Dial Telephone

Comment: MoKan Dial, Inc. demonstrates that the area the Applicant proposes to serve which overlaps MoKan Dial, Inc.'s service area does not meet any of the criteria which categorize an area as unserved or underserved. Further, the Applicant's proposed funded service area does not meet the definition of Remote.

As demonstrated, 80% of households in MoKan Dial, Inc.'s service area, including those areas which are part of the Applicant's proposed funded service area, are able to readily subscribe upon request to facilities-based, terrestrial broadband services at a minimum transmission speed of greater than 768 kbps downstream and 200 kbps upstream from MoKan Dial, Inc. Therefore, the Applicant's claim that this overlapping area is underserved due to limited access is incorrect. In addition, MoKan Dial, Inc. demonstrates that it advertises speeds of at least 3 Mbps downstream in its service area and that the rate of broadband subscribership for Miami County, Franklin County, and Cass County is significant.

The Applicant's proposed funded service area contains several non-rural areas, and is not shown as unserved, failing the definitional requirements for classification as a Remote area.

Submitter: Cimmaron Telephone Co.

Comment: Cimarron Telephone Company through its subsidiary Cim-Tel Cable, LLC, has been offering broadband speed data service to subscribers for over 5 years. The area applied for by the ARRA applicant, which falls within the telephone exchange boundary is served with high speed internet broadband service. Cim-Tel Cable, LLC also offers IPTV service to its subscribers within the communities Cimarron Telephone Company serves.

Submitter: Mound Bayou Telephone and Communications, Inc.

Comment: Mound Bayou Telephone and Communications is Mound Bayou's incumbent local exchange carrier and a Rural Utilities Service borrower whose fiber-fed network is capable of providing every business and residence in its certificated service area with broadband download rates of at least 3 megabits per second and upload rates of at least 768 kilobits per second.

Submitter: Pine Belt Telephone Company Inc.

Comment: Pine Belt Telephone Company, Inc. has been offering broadband speed data service to its subscribers for 7 years. The area applied for by the ARRA applicant which falls within the telephone exchange boundary is served with high speed internet broadband service. Pine Belt, through its subsidiary Pine Belt Broadcasting, LLC, also provides fiber broadband interconnectivity to eleven school locations in Orville, Lindon, Sweetwater, Dixon Mills and the Choctaw County School district.

Submitter: Veloxinet, Inc.

Comment: Our coverage area is overlaid in its entirety by WindTalk's grant application. Along with our service, this area also has at least 3 other Wireless providers as well as Cable internet and DSL in certain areas.

Submitter: Nortex Communications

Comment: Nortex Communications is disputing that its service area is unserved or underserved as it provides DSL services to 100% of its landline telephone service area which also includes fiber to the home in its two largest exchanges Muenster and Valley View. It also provides wireless internet via 700 Mhz licenses in areas lying outside of the landline telephone serving area and its affiliate provides cable modem broadband services outside of the telephone serving area for the cities of Saint Jo, Lindsay, Lake Kiowa and Collinsville Texas.

Submitter: TC Wireless

Comment: TC Wireless, Inc, along with its parent company The Tri-County Telephone Association, Inc., has been providing communications services to rural Kansas for over 46 years. TC Wireless was formed in 2004 specifically to provide wireless broadband services to communities that larger companies ignored. TC Wireless is a pioneer in providing high-quality services over the 700 Mhz wireless spectrum. It acquired its licenses at auction in 2002, taking a chance on the unproven spectrum. It began providing services in this band as soon as equipment was available. To meet the specific needs of the communities it serves, TC Wireless has expanded its offerings to include the 900 MHz and 2.4 MHz bands.

By utilizing an array of licensed and unlicensed spectrum, TC Wireless achieved a task five years ago that some still say today is not possible – bringing high speed Internet access to rural and remote areas. It did this, at considerable cost, because, as a local company, TC Wireless' owners, who are also its

customers, have a personal stake in the communities where they work and live. As a result, TC Wireless is providing rural America with advanced, reliable communications service.

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: KanOkla Networks

Comment: KanOkla Networks has been providing our customers the best in telecommunications/data technology for almost 60 years. We are the leader in our service areas for rolling out new and innovative services to our subscribers. We currently offer broadband service, at speeds up to 6 Mbps, to 100% of our current and potential customers. KanOkla is in the midst of installing Fiber To The Home (FTTH) to all of our exchange areas, bringing the capability of 100 Mbps to all homes and businesses throughout our areas. This project, with its wealth of bandwidth for our subscribers, will position our communities for the future.

Submitter: Madison Communications

Comment: Madison Communications provides comments on this application regarding the underserved designation of the proposed funded area.

Submitter: Home Communications, Inc.

Comment: For the portion of this application that overlaps the Home Communications, Inc. serving area, broadband of at least 768kbps downstream and 200kbps upstream is accessible to 100% of households and 100% of businesses. Additionally, Home Communications, Inc. offers a 3Mbps

downstream and 5Mbps downstream service in this area. Lastly, Home Communications, 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: Allen's TV Cable Service, Inc.

Comment: Allen's TV Cable Service submits the following information in response to the proposed service funded area. Windtalk's proposal includes areas currently served by Allen's TV Cable and other providers for the broadband market, thus providing adequate availability and users within our service area. Allen's began offering its rural markets high speed broadband Internet starting in 2001, with speeds already in excess of 3Mbps. Infrastructure already in place allows for both high speed cable modem services as well as FTTx advanced services in Allen's wired markets. Response map depicts these areas as well as our current cable modem rate schedule delivered to all customers and residences within these service areas.

Submitter: Cox Communications

Comment: Cox Communications, Inc. (Cox) is a broadband communications and entertainment company, providing advanced digital video, Internet, telephone and wireless services over its nationwide IP network. The third-largest U.S. cable TV company, Cox serves over 6.2 million residences and businesses.

Cox operates in hundreds of communities in 18 states and has invested over \$16 billion in private capital in its network over the last ten years. Cox provides its customers in Arkansas with 21st century infrastructure that provides advanced broadband, video and telephone services. More than 99.5 percent of the households in our service areas have access to Cox high-speed Internet, at some of the fastest broadband speeds available in the nation.

Cox supports the goals of the American Recovery and Reinvestment Act to extend broadband to parts of the country that are unserved or underserved. We appreciate the efforts of the Rural Utilities Service and the National Telecommunications and Information Administration in making sure that the limited amount of broadband stimulus funding available under the ARRA is targeted toward those consumers in greatest need, rather than to areas that already have access to broadband service.

To assist your agencies in ensuring that ARRA funds are directed to truly unserved and underserved areas, Cox is providing supplemental information that demonstrates, for the above-referenced

application, the following: the location of Cox's broadband infrastructure; broadband service levels provided; number of customers served; pricing for each service tier; and marketing materials which demonstrate service availability. Consistent with the statutory requirement to expend funds only for projects in eligible areas, we trust that your agencies will use this information -- along with information from other broadband providers -- to obtain a clear picture of service availability in the area covered by the application. We encourage the use of independent due diligence to determine the extent of other broadband service offerings in the proposed funded service area covered by this submission, if other providers fail to submit information prior to the submission deadline.

We request that this data be treated as confidential and proprietary. Much of the information provided with this letter constitutes trade secrets or commercial information that is privileged and confidential and therefore exempt from public disclosure under 5 U.S.C. § 552(b)(4). Cox does not disclose this information to the public, and release of this information could cause competitive harm, by enabling other broadband providers to tailor their business strategies to unfairly compete with Cox.

Thank you for the opportunity to submit this information. We trust that it will be helpful in your analysis, and will inform your final decision concerning the application.

Submitter: Suddenlink Communications

Comment: This response conclusively demonstrates that Suddenlink and its competitors already offer robust broadband service within the mapped area of the applicant's proposed funded service area and that this mapped area is 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.

Submitter: Chariton Valley Telephone

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 28.37% 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: Moundville Telephone Company

Comment: Moundville Telephone Company (“MTC”) is responding to this Public Notice Filing regarding Wind Talk Inc.’s application for broadband funding under the ARRA. The applicant’s proposed funded service area is a large multi-state area of 605,964 square miles in the southeastern and Midwestern United States. MTC is an incumbent broadband provider that currently offers broadband service (as defined in the NOFA) to 95% of the overlap with the applicant’s proposed funded service area, as outlined in the response area map. The proposed funded service area overlaps completely with MTC’s incumbent service area, and the applicant claims that the area is “underserved”. The data provided in this response demonstrates that the applicant’s claim that the proposed funded service area which overlaps with MTC is “underserved” is simply not true.

Submitter: GBT Communications

Comment: Golden Belt Telephone and its affiliate, GBT Communications (GBT) have been providing high-quality communications services to rural and remote communities in Western Kansas for over 56 years. GBT is committed to bringing cutting-edge technologies to residents of areas that larger providers ignore. As a result, GBT has pioneered many services in this part of the country including providing broadband services for over 12 years and now has over 3,000 broadband customers throughout its service areas that can access the Internet at speeds up to 6 Mbps. To ensure that its customers’ traffic had the best possible backbone, GBT began laying fiber to connect its remote service areas in 1989. Twenty years later, GBT’s customers enjoy advanced services due to over 1000 miles of fiber within GBT’s service areas. Looking to the future when customers will need large amounts of bandwidth at high speeds, GBT has begun a Fiber-To-The-Home (FTTH) project. Upon completion, 100% of customers in regulated service areas will have broadband access at fiber-speeds.

Currently, GBT customers can access broadband services through a variety of technologies, including FTTH, traditional copper, fixed wireless, unlicensed wireless (Wi-Fi) and cable modem. GBT employs multiple broadband technologies based on its knowledge of the specific needs of the communities it serves coupled with its half-century of experience providing advanced communication services in difficult to serve areas.

GBT is a local company that anchors the communities it serves. It provides much-needed jobs, 24-7 customer service and local offices. GBT provides necessary broadband services to community anchor institutions including schools, libraries, local government offices and public safety agencies. It serves from a local perspective because GBT's owners, who are also its customers, have a personal stake in the communities where they work and live

Submitter: Blossom Telephone Company, Inc.

Comment: Blossom Telephone Company, Inc.

OMB Control Number: 0660-0031

OMB Control Number: 0572-0142

Windtalk, in its extremely large multi-state ARRA funding applications has incorrectly filed for ARRA funding for areas that include all of Blossom Telephone Company's (Blossom) exchange area in Texas. Windtalk has incorrectly identified the entire Blossom exchange area in Texas as underserved. Windtalk is wrong in their assertion and blanket filing. Blossom is providing broadband speeds equal to or in excess of 768 kbps throughout its service territory. In addition, a significant portion of their exchange area also has highspeed broadband service being provided by a cable provider as well as at least one wireless service provider. It therefore would seem plain that Windtalk did not perform due diligence in submitting its application for the Blossom service area. We also want to note that Blossom recently was approved for a RUS loan project specifically designed to construct a Fiber to the Home (FTTH) network in the Blossom exchange that will enable broadband speeds in excess of 5 Mbps.

We strongly oppose Windtalk's filing and their request for funds on the basis that they have incorrectly identified the service area of Blossom in its entirety as underserved when Blossom is providing broadband access at speeds equal to or greater than 768 kbps throughout their exchange. We recommend that the Windtalk application regarding Blossom Telephone Company in Texas be rejected.

If you have any questions, or need additional information please do not hesitate to contact us.

Sincerely,

Clint Dorries

Blossom Telephone Company, Inc.

Submitter: Cunningham Communications

Comment: Cunningham Telephone Company, with its affiliate Cunningham Communications has been providing high-quality communications services to the residents of the rural communities of northwestern Kansas for more than 65 years. It was one of the first providers in this remote area to offer broadband services eleven years ago. Currently, almost 100% of Cunningham's service areas have broadband capability reaching speeds up to 10 Mbps.

In keeping with its long tradition of providing cutting-edge technologies, Cunningham has begun a Fiber To The Home (FTTH) project. Through this FTTH project, estimated to be completed in 2012, every customer in a majority of Cunningham's service areas, even in the most remote rural areas, will have a direct fiber feed from their home and business to the world.

Cunningham is a local company that helps anchor the communities it serves. It provides much-needed jobs, 24-7 customer service and local offices. Cunningham provides necessary broadband services to community anchor institutions including schools, libraries, local government offices and public safety agencies. It serves from a local perspective because Cunningham's owners and employees have a personal stake in the communities where they work and live.