

## Broadband USA Applications Database

**Applicant Name:** Rural Broadband LLC

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### Public Notice Submissions

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-----**Service Area:** Carbon County

**Submitter:** Cabla Montana, LLC

**Comment:** Cable Montana offers high speed data services with more than 3 Meg download speeds in Fromberg, Joliet and Red Lodge, MT. Cable Montana's penetration is 9% in Fromberg, but it was launched with the last 12 months. There is also a local independent phone provider that offers DSL in Fromberg. Cable Montana's penetration is 33% in Red Lodge and 17% in Joliet. Cable Montana also provides wireless high speed internet in Joliet. It does not seem necessary, not a benefit to these communities, to provide funding to build out last mile projects in Fromberg, Joliet or Red Lodge, MT.

-----**Service Area:** Rosebud County

**Submitter:** Cable Montana, LLC

**Comment:** Cable Montana provides high speed data services with 3 Meg download speeds to both Colstrip and Forsyth, Montana. Cable Montana launched high speed data service in December 2007 and have seen a steady increase in customers. We are not the only HSD provider in Colstrip. We also compete with the local telephone company which offers DSL service. In Forsyth, we compete with Range Telephone, the local telephone provider for HSD customers. Given that two providers already offer high speed data service in both communities, it does not seem necessary nor beneficial to provide funding to build out last mile projects in either Colstrip or Forsyth, MT.

**Submitter:** Range Telephone Cooperative

**Comment:** Range Telephone Cooperative, Inc. (Range) is an Independent Local Exchange Carrier (ILEC) and a Competitive Local Exchange Carrier (CLEC) serving 5490 access lines in rural Southeastern Montana. Range service area includes the Northern Cheyenne Indian Reservation and a portion of the Crow Reservation including the towns of Lame Deer and Busby, Montana. The counties included are

Carter, Custer, Rosebud, Powder River, Treasure and Big Horn in Montana. Range is an active RUS borrower with loan funds due for completed projects and loan funds being requested for new projects and upgrades. Range will start a 5 yr RUS construction plan in 2010 to place buried fiber optic cable in various locations within Range's service area to enhance existing broadband backhaul and provide future FTTH. 73% of Range's serving area subscriber households and business locations are capable of 3mb service today. Approximately 58% of Range residential households in the applicants proposed funded service area already subscribe to 3 mb or 1.5 mb service today.

The applicant's proposed funded service area that overlaps Range's service area in Montana is not unserved or underserved as represented in the applicant's proposal.

With respect to the Rural Broadband Montana Expansion Broadband application for broadband funds support in Rosebud County Montana, their comments that the areas are unserved or underserved are not true. We serve Rosebud County and it is capable of 1.5 mb or higher broadband service to the households that we serve. The area we serve is very rural but we still are trying to meet our customer's broadband needs.

Range has been providing excellent communication services to this area for over 40 years. Range used RUS loan funds to build the infrastructure in this area to get customers communication service. Range is a Cooperative that is owned by its members and they get the same high quality communication services. We are currently in the process of upgrading our backbone fiber with electronics that will further improve the broadband services in this area. We will utilize RUS loan funds from our recent application (not stimulus related) to eventually try to get our members/customers 100 mb of broadband in the next 4 to 5 years.

Range is very sensitive to its member/owner's needs and we have focused the majority of our efforts on improving broadband services to them. Rural Broadband Montana Expansion's comments that much of the area that they applied for is unserved or underserved are not true in the case of our service area in Rosebud County. Range has 32 employees that already reside very near to that area and service those customers professionally. Our rates are very affordable and competitive.

-----**Service Area:** Judith Basin County

**Submitter:** Central Montana Communications

**Comment:** Central Montana Communications provides broadband service in the area indicated in the attached map using DSL technologies. Because of the service offered by Central Montana Communications, the Hobson area does not meet the definition of underserved under the ARRA. Central Montana Communications offers broadband to greater than 50% of the households in the area, advertises speeds of three mbps, and greater than 40% of the households within the area subscribe to broadband thru Central Montana Communications.

-----**Service Area:** Treasure County

**Submitter:** Mid-Rivers Communications

**Comment:** As indicated on our response map, Mid-Rivers Communications does currently serve a portion of Treasure County, Montana, with DSL services available at downstream speeds of 768 Kbps. In addition, our existing middle mile Gigabit Ethernet fiber route passes through the center of the County.

**Submitter:** Range Telephone Cooperative

**Comment:** Range Telephone Cooperative, Inc. (Range) is an Independent Local Exchange Carrier (ILEC) and a Competitive Local Exchange Carrier (CLEC) serving 5490 access lines in rural Southeastern Montana. Range service area includes the Northern Cheyenne Indian Reservation and a portion of the Crow Reservation including the towns of Lame Deer and Busby, Montana. The counties included are Carter, Custer, Rosebud, Powder River, Treasure and Big Horn in Montana. Range is an active RUS borrower with loan funds due for completed projects and loan funds being requested for new projects and upgrades. Range will start a 5 yr RUS construction plan in 2010 to place buried fiber optic cable in various locations within Range's service area to enhance existing broadband backhaul and provide future FTTH. 73% of Range's serving area subscriber households and business locations are capable of 3mb service today. Approximately 55% of Range residential households in the applicants proposed funded service area already subscribe to 3 mb or 1.5 mb service today.

The applicant's proposed funded service area that overlaps Range's service area in Montana is not unserved or underserved as represented in the applicant's proposal.

With respect to the Rural Broadband Montana Expansion Broadband application for broadband funds support in Treasure County Montana, their comments that the areas are unserved or underserved are

not true. We serve Treasure County and it is capable of 1.5 mb or higher broadband service to the households that we serve. The area we serve is very rural but we still are trying to meet our customer's broadband needs.

Range has been providing excellent communication services to this area for over 40 years. Range used RUS loan funds to build the infrastructure in this area to get customers communication service. Range is a Cooperative that is owned by its members and they get the same high quality communication services. We are currently in the process of upgrading our backbone fiber with electronics that will further improve the broadband services in this area. We will utilize RUS loan funds from our recent application (not stimulus related) to eventually try to get our members/customers 100 mb of broadband in the next 4 to 5 years.

Range is very sensitive to its member/owner's needs and we have focused the majority of our efforts on improving broadband services to them. Rural Broadband Montana Expansion's comments that much of the area that they applied for is unserved or underserved are not true in the case of our service area in Treasure County. Range has 2 employees that already reside very near to that area and service those customers professionally. Our rates are very affordable and competitive.

-----**Service Area:** Yellowstone County

**Submitter:** VIKING Broadband, Inc.

**Comment:** The communities of Huntley, Worden, and Ballantine in Rural Broadband LLC's proposed service area of Yellowstone county are, and have been, served with broadband service to 10MB by VIKING Broadband, Inc.

**Submitter:** Bresnan Communications

**Comment:** Based on our research and exposure in this service area, we've concluded that this proposed funded service area fails to meet the NOFA definitions of underserved or unserved as defined in NOFA.

Bresnan, along with other local telcos such as Qwest, provide broadband service in this service area via cable modem and DSL technology. Bresnan provides several tiers of broadband service with download speeds ranging from 1.5mbps to 15mbps.

Our market research and in-depth knowledge of our markets show that we occupy approximately 45-55% of the market share of broadband subscribers in this market, with the remaining distributed among incumbent telcos. With the subscribers and penetration levels entered below, this market area exceeds the penetration and access thresholds as defined in the NOFA, thus making this application ineligible for BTOP/BIP funds in this proposed funded service area.

We have outlined our service areas on the mapping tool provided. Also, see the attached supporting document for additional information regarding our product offering and price points in this market. We also entered confidential and sensitive subscriber details to support our case.

**Submitter:** Triangle Telephone Cooperative

**Comment:** Triangle Telephone Cooperative provides broadband service in the area indicated in the attached map using DSL technologies. Because of the service offered by Triangle Telephone, this area does not meet the definition of underserved under the ARRA. Triangle Telephone offers broadband to greater than 50% of the households in the area, advertises speeds of three mbps, and greater than 40% of the households within the area subscribe to broadband thru Triangle Telephone.

**Submitter:** Project Telephone Company, Inc. dba Nemont

**Comment:** The proposed funded service area is not fully contained within the service area of Nemont Telephone Cooperative, Inc (Nemont). Nemont is aware of broadband services provided by others in our service area. Nemont can demonstrate that within the area Nemont serves, of the three criteria used to qualify an area as underserved, two are not applicable to this proposed funded service area. The services that Nemont offers and provides exceed the thresholds set of 50% of households having access to broadband service (as defined in the NOFA) and advertising at least three megabits per second (3Mbps).

**Submitter:** Mid-Rivers Communications

**Comment:** As indicated on our response map, large sections of the Applicant's Proposed Funded Service Area in Yellowstone County are NOT UNDERSERVED. Mid-Rivers Communications currently provides and advertises DSL speeds of up to 3 Mbps DOWNSTREAM / 1 Mbps UPSTREAM in the community of Custer, and 1.5 Mbps DOWNSTREAM / 256 KBPS Upstream in the Shepherd/Acton area. Mid-Rivers is the Incumbent Local Exchange provider in these areas, and was recently approved for a Rural Utilities Service (RUS) loan for future Fiber to the Premise (FTTP) build out in this exchange. The Mid-Rivers middle mile Gigabit Ethernet fiber route also passes through this Applicant's Proposed Funded Service area as indicated on the response map.

-----**Service Area:** Big Horn County

**Submitter:** Project Telephone Company, Inc. dba Nemont

**Comment:** The proposed funded service area is not fully contained within the service area of Nemont Telephone Cooperative, Inc (Nemont). Nemont is aware of broadband services provided by others in our service area. Nemont can demonstrate that within the area Nemont serves, of the three criteria used to qualify an area as underserved, two are not applicable to this proposed funded service area. The services that Nemont offers and provides exceed the thresholds set of 50% of households having access to broadband service (as defined in the NOFA) and advertising at least three megabits per second (3Mbps).

**Submitter:** Cable Montana, LLC

**Comment:** Cable Montana provides high speed data service with 3 Meg download speeds to Hardin, MT. Currently, Cable Montana has 10% of the penetration in Hardin. Qwest, the local telephone provider, also provides high speed data service through DSL and hold a portion of the market share. It does not seem necessary, nor a benefit to the community, to provide funding to build out a last mile project in Hardin, MT.

**Submitter:** Qwest

**Comment:** As authorized by the BIP and BTOP Notice of Funds Availability and the Public Notice associated with the publication of BIP and BTOP broadband infrastructure project funding applications found on the BroadbandUSA.gov website, Qwest responds with broadband service data to the application of Rural Broadband LLC for funding for an area represented as “underserved” that is located, in whole or in part, in Qwest’s broadband service area

**Submitter:** Range Telephone Cooperative

**Comment:** Range Telephone Cooperative, Inc. (Range) is an Independent Local Exchange Carrier (ILEC) and a Competitive Local Exchange Carrier (CLEC) serving 5490 access lines in rural Southeastern Montana. Range service area includes the Northern Cheyenne Indian Reservation and a portion of the Crow Reservation including the towns of Lame Deer and Busby, Montana. The counties included are Carter, Custer, Rosebud, Powder River, Treasure and Big Horn in Montana. Range is an active RUS borrower with loan funds due for completed projects and loan funds being requested for new projects and upgrades. Range will start a 5 yr RUS construction plan in 2010 to place buried fiber optic cable in various locations within Range's service area to enhance existing broadband backhaul and provide future FTTH. 73% of Range's serving area subscriber households and business locations are capable of 3mb service today. Approximately 74% of Range residential households in the applicants proposed funded service area already subscribe to 3 mb or 1.5 mb service today.

The applicant's proposed funded service area that overlaps Range's service area in Montana is not unserved or underserved as represented in the applicant's proposal.

With respect to the Rural Broadband Montana Expansion Broadband application for broadband funds support in Big Horn County Montana, their comments that the areas are unserved or underserved are not true. We serve a part of Big Horn County and it is capable of 1.5 mb or higher broadband service to the households that we serve. The area we serve is very rural but we still are trying to meet our customer's broadband needs.

Range has been providing excellent communication services to this area for over 40 years. Range used RUS loan funds to build the infrastructure in this area to get customers communication service. Range is a Cooperative that is owned by its members and they get the same high quality communication services. We are currently in the process of upgrading our backbone fiber with electronics that will further improve the broadband services in this area. We will utilize RUS loan funds from our recent application (not stimulus related) to eventually try to get our members/customers 100 mb of broadband in the next 4 to 5 years.

Range is very sensitive to it member/owner's needs and we have focused the majority of our efforts on improving broadband services to them. Rural Broadband Montana Expansion's comments that much of the area that they applied for is unserved or underserved are not true in the case of our service area in Big Horn County. Range has 2 employees that already reside very near to that area and service those customers professionally. Our rates are very affordable and competitive.

-----**Service Area:** Fergus County

**Submitter:** Mid-Rivers Communications

**Comment:** Mid-Rivers Communications has provided and advertised broadband services of up to 10 Mbps downstream in the Lewistown, Montana, community since 2007. Broadband up to 12 Mbps / 2 Mbps is also available upon request in Lewistown, in addition to Business Internet and Ethernet services scalable up to symmetrical speeds of 100 Mbps. We currently provide broadband via cable modem in the Lewistown City Limits and via Fiber to the Premise (FTTP) facilities in surrounding subdivisions and rural areas. Mid-Rivers has been designated by the Montana Public Service Commission as an Eligible Telecommunications Carrier (ETC) in the Lewistown Exchange, and to date we have deployed broadband to approximately 75% of the population of the Exchange. We continue extending the reach of these service on an annual basis as part of an on-going build-out plan. Broadband of up to 1.5 Mbps downstream is also provided to the Grass Range community, in which Mid-Rivers is the Incumbent Local Exchange Carrier. We were also recently approved for a Rural Utilities Service (RUS) Loan for future FTTP buildout in the Grass Range exchange. We are currently serving over 1,800 broadband subscribers in the Proposed Funded Service Area, much of which is a competitive environment with at least two other providers offering broadband services in the area.

**Submitter:** Central Montana Communications

**Comment:** Central Montana Communications provides broadband service in the area indicated in the attached map using DSL technologies. Because of the service offered by Central Montana Communications, this area does not meet the definition of underserved under the ARRA. Central Montana Communications offers broadband to greater than 50% of the households in the area, advertises speeds of three mbps, and greater than 40% of the households within the area subscribe to broadband thru Central Montana Communications.

-----**Service Area:** Petroleum County

**Submitter:** Mid-Rivers Communications

**Comment:** As shown on our response map, nearly the entire Proposed Funded Service Area designated by this Applicant is NOT UNSERVED OR UNDERSERVED. Mid-Rivers Communications is the Incumbent Local Exchange provider in Winnett and much of the balance of Petroleum County. We currently provide and advertise broadband of up to 5 Mbps DOWNSTREAM / 1 Mbps UPSTREAM in Winnett, and broadband meeting the NOFA definition in surrounding rural areas. We have also recently been approved for a Rural Utilities Service (RUS) loan for future construction of Fiber to the Premise (FTTP) services in these Exchanges.

-----**Service Area:** Musselshell County

**Submitter:** Mid-Rivers Communications

**Comment:** As indicated on our response map, the Applicant's ENTIRE Proposed Funded Service Area is NOT UNDERSERVED as they have stated. Mid-Rivers Communications, the Incumbent Local Exchange provider throughout this area, currently provides and advertises broadband of up to 5 Mbps DOWNSTREAM / 1 Mbps UPSTREAM in the communities of Roundup, Musselshell, and Melstone, and broadband meeting the NOFA definition to other surrounding rural areas. We have also recently been approved for a Rural Utilities Service (RUS) loan for future construction of Fiber to the Premise (FTTP) services in these Exchanges.

-----**Service Area:** Golden Valley County

**Submitter:** Mid-Rivers Communications

**Comment:** As shown on our response map, many areas of Golden Valley County, Montana, including the communities of Lavina and Ryegate, are NOT UNDERSERVED as the Applicant has indicated. Mid-Rivers Communications is the Incumbent Local Exchange provider for the communities of Lavina and Ryegate and much of the balance of Golden Valley County, which is one of the least populated counties in the state. We currently provide and advertise broadband speeds of up to 5 Mbps DOWNSTREAM / 1 Mbps UPSTREAM in both Lavina and Ryegate, and broadband of at least 768 Kbps downstream in other areas of the County indicated on the response map. We have been providing affordable, reliable wireline broadband to the schools, ambulance services, fire departments, and other vital community facilities in these areas for several years utilizing existing funding sources, and have plans to build Fiber

to the Premise (FTTP) facilities to this Exchange in the future utilizing a recently-approved Rural Utilities Service (RUS) loan.

-----**Service Area:** Custer County

**Submitter:** Mid-Rivers Communications

**Comment:** As shown on our response map, the majority of the Custer County area identified by the Applicant is NOT UNDERSERVED. Mid-Rivers Communications currently provides and advertises broadband services of up to 10 Mbps DOWNSTREAM / 1 Mbps UPSTREAM in the Miles City community (which is indicated on the Applicant's map as underserved), in competition with at least one other provider. Broadband speeds of up to 12 Mbps / 2 Mbps are also provided upon request, in addition to Business Internet and Business Ethernet services scalable to symmetrical speeds of up to 100 Mbps. We can and do currently provide these services to the key community facilities in Miles City, including the hospital, community college, school district, and over 2,700 other institutions, State and Federal agencies, businesses and residents. We also provide broadband of at least 768 Kbps downstream to other areas of Custer County, including several recent Fiber to the Premise (FTTP) build-outs in outlying subdivisions, and utilizing 700 MHz wireless spectrum capable of up to 1.5 Mbps downstream in the Kinsey area. Additional FTTP build-out is planned for this area over the next several years.

**Submitter:** Range Telephone Cooperative

**Comment:** Range Telephone Cooperative, Inc. (Range) is an Independent Local Exchange Carrier (ILEC) and a Competitive Local Exchange Carrier (CLEC) serving 5490 access lines in rural Southeastern Montana. Range service area includes the Northern Cheyenne Indian Reservation and a portion of the Crow Reservation including the towns of Lame Deer and Busby, Montana. The counties included are Carter, Custer, Rosebud, Powder River, Treasure and Big Horn in Montana. Range is an active RUS borrower with loan funds due for completed projects and loan funds being requested for new projects and upgrades. Range will start a 5 yr RUS construction plan in 2010 to place buried fiber optic cable in various locations within Range's service area to enhance existing broadband backhaul and provide future FTTH. 73% of Range's serving area subscriber households and business locations are capable of 3mb service today. Approximately 60% of Range residential households in the applicants proposed funded service area already subscribe to 3 mb or 1.5 mb service today.

The applicant's proposed funded service area that overlaps Range's service area in Montana is not unserved or underserved as represented in the applicant's proposal.

With respect to the Rural Broadband Montana Expansion Broadband application for broadband funds support in Custer County Montana, their comments that the areas are unserved or underserved are not true. We serve a part of Custer County and it is capable of 1.5 mb or higher broadband service to the households that we serve. The area we serve is very rural but we still are trying to meet our customer's broadband needs.

Range has been providing excellent communication services to this area for over 40 years. Range used RUS loan funds to build the infrastructure in this area to get customers communication service. Range is a Cooperative that is owned by its members and they get the same high quality communication services. We are currently in the process of upgrading our backbone fiber with electronics that will further improve the broadband services in this area. We will utilize RUS loan funds from our recent application (not stimulus related) to eventually try to get our members/customers 100 mb of broadband in the next 4 to 5 years.

Range is very sensitive to its member/owner's needs and we have focused the majority of our efforts on improving broadband services to them. Rural Broadband Montana Expansion's comments that much of the area that they applied for is unserved or underserved are not true in the case of our service area in Custer County. Range has 2 employees that already reside very near to that area and service those customers professionally. Our rates are very affordable and competitive.

-----**Service Area:** Sweetgrass County

**Submitter:** Triangle Telephone Cooperative

**Comment:** Triangle Telephone Cooperative provides broadband service in the area indicated in the attached map using DSL technologies.

**Submitter:** Cable Montana, LLC

**Comment:** Cable Montana offers high speed data service with 3 Meg download speeds in Big Timber, MT. Currently Cable Montana has approximately 21% penetration of the homes; however, Big Timber

also has an independent phone company, Triangle Telephone, that provides DSL high speed data service as well. Between both provides Big Timber would be considered a served community. It does not seem necessary, nor a benefit, to provide funding to build out a last mile project in Big Timber, MT.

-----**Service Area:** Wheatland County

**Submitter:** Central Montana Communications

**Comment:** Central Montana Communications provides broadband service in the area indicated in the attached map using DSL technologies. Because of the service offered by Central Montana Communications, this area does not meet the definition of underserved under the ARRA. Central Montana Communications offers broadband to greater than 50% of the households in the area, advertises speeds of three mbps, and greater than 40% of the households within the area subscribe to broadband thru Central Montana Communications.

-----**Service Area:** Stillwater County

**Submitter:** Triangle Telephone Cooperative

**Comment:** Triangle Telephone provides broadband service in the area indicated in the attached map using DSL technologies. Because of the service offered by Triangle Telephone, this area does not meet the definition of underserved under the ARRA. Triangle Telephone offers broadband to greater than 50% of the households in the area, advertises speeds of three mbps, and greater than 40% of the households within the area subscribe to broadband thru Triangle Telephone.

**Submitter:** Project Telephone Company, Inc. dba Nemont

**Comment:** The proposed funded service area is not fully contained within the service area of Nemont Telephone Cooperative, Inc (Nemont). Nemont is not aware of broadband services provided by others in our service area. Nemont can demonstrate that within the area Nemont serves, of the three criteria used to qualify an area as underserved, two are not applicable to this proposed funded service area. The services that Nemont offers and provides in this proposed funded service area exceed the thresholds set

of 50% of households having access to broadband service (as defined in the NOFA) and Nemont can demonstrate greater than 40% subscription rate to broadband services.

**Submitter:** Cable Montana, LLC

**Comment:** Cable Montana provides high speed data services with more than 3 Meg download speeds to Columbus and Park City, Montana. Cable Montana's penetration in Park City is 43.94% and is 20% in Columbus. Park City is considered served due to the penetration percentage, not underserved. We also compete with the local telephone providers in both Columbus and Park City, which offers DSL high speed data service. It does not seem necessary, nor beneficiary to the communities, to provide funding to build out last mile projects in either Columbus or Park City, MT.

**Submitter:** Qwest

**Comment:** As authorized by the BIP and BTOP Notice of Funds Availability and the Public Notice associated with the publication of BIP and BTOP broadband infrastructure project funding applications found on the BroadbandUSA.gov website, Qwest responds with broadband service data to the application of Rural Broadband LLC for funding for an area represented as "underserved" that is located, in whole or in part, in Qwest's broadband service area